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Department of Energy
Richland Operations Office
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Richland, Washington 99352

03-CLO-0058

FEB 0 5 2008

Mr. M. C. Hughes, President
Bechtel Hanford, Inc.
3350 George Washington Way
Richland, Washington 99352

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FEB 0 6 2008

EDMC

Dear Mr. Hughes:

CONTRACT NO. DE-AC06-93RL12367 - DOE COMMENTS-DECISIONAL DRAFT,
INFORMATION OF HAZARDOUS SUBSTANCE RELEASES WITHIN THE 100 AREA
FOR THE 100-IU-1 AND 100-IU-3 OPERABLE UNITS, (DOE/RL 2002-74)

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Thank you for the opportunity to review and comment on the afore mentioned document.

Consolidated comments are attached. If you have questions, you may contact Astrid P. Larsen,

Closure Division, on (509) 372-0477.

Sincerely,

Richard O. Puthoff
Richard O. Puthoff
Contracting Officer

CLO:APL

Attachment

cc w/attach:
S. G. Weiss, BHI

Consolidated DOE-RL comments on *Information of Hazardous Substance Releases Within the 100 Area for the 100-IU-1 and 100-IU-3 Operable Units*, DOE/RL-2002-74, Decisional Draft.

1. Page iv, Appendices. Should North Slope be included with reference to Riverlands Activity?
2. Page v. Suggest including Initialisms to the heading. Possibly include CDM, DDT/DDE/DDT, FR, IU, PCB, PAH, PPB, PPT, RA, RCRA, TPA. USBR should probably be USBOR.
3. Check the usage of "debris" throughout to clarify, since debris is both singular and plural.
4. Include the purpose and/or layout of the document at the top of Section 1.0 Introduction.
5. Section 1.1, clarify in the section title that this is the history of CERCLA actions at Hanford or 100-IU-1 and IU-3.
6. Page 1, 4th paragraph, Sentence that starts with "Tons of surface and landfilled debris...." Suggest leaving out the word "tons" or clarifying how many tons.
7. Page 1, 4th paragraph, last sentence. Reference the Proposed Plan and ROD.
8. Page 1, 5th paragraph. "A Notice of Intent to Delete for partial deletion from the 100 Area aggregate site was published in the *Federal Register* on May 22, 1998 (63 FR 28317). Effective July 8, 1998, the 100-IU-1 and 100-IU-3 OU portion of the 100 Area NPL Site were deleted...."
9. Page 2, 1st paragraph, first sentence. Consider making this sentence part of the "introductory" section explaining purpose of document.
10. Page 2, second paragraph, 2-4D site referenced under RCRA
11. Page 2, second paragraph, last sentence. Delete sentence referring to FWS. The purpose of this document is to document information on hazardous substances, regardless of any interest by FWS.
12. Page 2, Section 1.2, second paragraph, general comment. Is this geology information really relevant to anything in the document? We're cataloguing releases, not how releases are transported through the soil. I'd suggest deleting the paragraph.
13. Page 2, Section 1.2, second paragraph, first sentence, "The geologic structure...consists of 3 levels of soil formation:", replace soil formation with geologic formation.
14. Page 2, Section 1.2, second paragraph, middle section discussing the affects of these 2 OUs on the groundwater. DDT is a basin-wide contaminant so the conclusion in this paragraph may not be entirely correct.
15. Page 2, Section 1.2, last 2 sentences discussing non-Hanford land uses. Wildlife conservation needs to be included in both sentences.
16. Page 3, Section 1.2.1, first paragraph, general comment. Delete section. The intent of the document is to catalogue the release of hazardous substances, not to discuss land management issues.
17. Page 3, Section 1.2.1, first paragraph, last few sentences. Delete section regarding the memorandum and additional consultations with the FWS? This does not add value to the discussion of releases of hazardous substances.
18. Page 3, Section 1.2.1, middle of first paragraph. "...Understanding covering management responsibilities for the Saddle Mountain portion of the Monument."
19. Page 3, Section 1.2.2, general comment. Delete section. Does not add value to topic of document.
20. Page 3, Section 1.2.2, first sentence. Delete first sentence, does not add value.
21. Page 3, Section 1.2.2.1, general comment. Delete.
22. Page 4, Section 1.2.2, general comment. Delete.
23. Page 4, Section 1.3.1, first sentence. Add the word "listed" between sites and in. Provide a reference for the ROD.
24. Page 5, Section 1.3.2, second paragraph, last sentence. Clarify that the concentration of herbicides and pesticides is for the military sites.
25. Page 5, Section 1.3.2, third paragraph. Were the other landfills fully excavated or just top soil removed?
26. Page 5, Section 1.3.2, 4th paragraph. Delete "only" from last sentence.
27. Page 6, Section 1.4, Section title. Would a more accurate title be Additional Studies and Analysis?
28. Page 6, Section 1.4, First paragraph, first sentence. Per what proposed plan? The plan needs a bit more explanation or introduction.
29. Page 6, Section 1.4, after indented paragraph. Suggest explaining that PAHs in asphalt matrix is exempt from CERCLA.
30. Page 6/7, Section 1.4, last 2 paragraphs. DDE and DDT seem to be used interchangeably. In the second to the last paragraph, was the potentially higher risk exposure from DDE or DDT?

31. Page 7, Section 2.0, third paragraph. "PCS" needs an introduction.
32. Page 8, Section 2.1, last sentence. "AEC" needs an introduction.
33. Page 9, Section 2.2, second paragraph, last sentence. Was the bunker backfilled as stated?
34. Page 9, Section 2.2, second paragraph, grammatical changes. "The septic system that was associated.." "Remnant of the concrete.."
35. Page 10, Section 2.3, last paragraph. Delete the word "thus" from last sentence. Suggest using the global search feature and removing "thus" from other sentences as well.
36. Page 11, Section 2.5, last paragraph. Starting with the sentence "In 1993, 23 bags...along with two 9-m.." meters and yards should have a cubic designation. 10 cubic yards rounds to 8 cubic meters.
37. Page 13, Section 2.6, first full sentence top of page. There is no contaminant specified for the 200 ppm action level.
38. Page 14, Section 2.9, second paragraph. Were the containers removed or left in place?
39. Page 14, Section 2.10. A recent visit to McGee indicates that there is probably more than 1 car bodies at this location.
40. Page 15, Section 2.12. Another car is located north of Highway 24 on public access land.
41. Page 15, Section 2.13, middle paragraph, last sentence. Do we want to hazard a guess as to why there is sparse to no vegetation in this area? Are we suggesting that the red material is responsible?
42. Page 17, first paragraph, last sentence. Another reason for the buffer zone is related to air regulations to reduce dose to a "maximally exposed individual".
43. Page 18, first paragraph. Confusing math. Discussion starts out with 36 and 38 sites and the last sentence discusses 3 sites deleted from the NPL. Does there need to be more verbiage to describe the situation?
44. Page 22, Section 3.6, third paragraph. Is the agreement of safety analysis documented and referenceable?
45. Page 33, second paragraph. There is a statement that the vegetation monitoring results are published annually. Is this for some extended period of time or for 5 years post clean-up?
46. Page 34, third paragraph, same comment about the frequency of the report.
47. Page 35, last sentence. Is the stated unit of measure, micrograms/gram, correct or should it read parts per million?
48. Page 49, first sentence. Will the vegetation monitoring report be published annually for some extended period of time? If this is not correct, suggest doing a global search to find all references.
49. Page A-3. Add another footnote to indicate that U is undetected.
50. Page A-4, right column, last entry. Could use some more explanation of why an unknown amount was removed.