

Larsen, Astrid P

From: Larsen, Astrid P
Sent: Monday, February 03, 2003 3:48 PM
To: Tamez, Victoria M (Vicky)
Cc: Larsen, Astrid P
Subject: letter for e-stars

Tammy
Please prepare the following letter for E-stars concurrence. Also attached are the comments referenced in the letter.
Please call if you have any questions.

thank you
Astrid



comments to
information docume...



draft 100 Area Info
doc.commen...

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FEB 06 2008
EDMC

Mr. S.G. Weiss
Bechtel Hanford, Inc.
3350 George Washington Way
Richland, WA 99352

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)

Dear Mr. Weiss:

Thank you for the opportunity to review and comment on the afore mentioned document. Consolidated comments are attached. If you have any questions, please contact Astrid Larsen at 372-4077.

Sincerely,

Steve Wisness

Concurrence-Astrid, Connie Smith, Wisness

BCC-Astrid, Connie, Jamie Zeisloft, Thomas Ferns

Record Note-Comments were received from Jamie Zeisloft and Tom Ferns. Document was discussed with OCC. A draft of the comments were e-mailed to Steve Weiss to support the January 30 deadline. This letter closes out E-Stars action LMSI-RLCC-CLO-2003-0019. The draft document transmitted by BHI summarizes and presents available information on the nature and extent of contamination at waste sites in the in the 100-IU-1 and 100-IU-3 Operable Units. These operable units were deleted from the NPL in 1998. This document was prepared in part to fulfill our obligations under CERCLA to assess whether further natural resource damage assessment are needed.

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 verbage 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.



View	Task	Reports	Help
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Pending	Closed	Draft	Search

LMSI-RLCC-CLO-2003-0019.1 - Closed (01/29/2003) Larsen, Astrid P (DOE-CLO)

Task Information

Subject	104620/TRANS OF DECISIONAL DRAFT INFORMATION OF HAZARDOUS SUBSTANCE		
Parent Task #	LMSI-RLCC-CLO-2003-0019	Status	Closed
Reference #	104620/D9203369	Due Date/Time	01/30/2003 00:00
Deliverable	None	Priority	High
Category	None	Originator	Tamez, Vicky M
View Permissions	Normal	Originator Phone	(509) 373 - 9535

Assignment Information

Assigned By	Self	Assigned Date	12/30/2002
Assigned Role	Originator	Assigned Due Date	01/30/2003 0000

Files / Links

D9203369.rms

Routing Lists **Route List** List Type SERIAL List Status INACTIVE

Name	Role	Response	Response Date	Viewed
Larsen, Astrid P (DOE)	Approve	Cancelled	01/29/2003	12/30/2002(Accepted : 2002-12-30 13:05:42)

Routing List Instructions

ACTION IS TO A LARSEN
 ACTION IS DUE 01/30/03
 D9203369