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START
[0] From: Vernon R (Vern) Dronen 8/2/94 11:20AM (75733 bytes: 5 ln, 1 fl)
To: Denis F Treida
Subject: response to EPA RI/FS Comments

----- Forwarded -----

From: Frederick V Roeck at WHC300 8/2/94 10:47AM (75513 bytes: 5 ln, 1 fl)
To: Bryan L Foley at DOE19
cc: Vernon R (Vern) Dronen at WHC85, Frederick V Roeck
Subject: Rfponse to EPA RI/FS Comments

----- Message Contents -----

Text item 1:

attached are the draft responses to the latest EPA comments on the ERDF RI/FS. Please review the responses and get back to me with your thoughts as soon as you can. Thanks.

Should we expect additional DOE comments on the package?



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ERDF DMC

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Draft
Responses to Regulator Comments on the ERDF RI/FS, Rev. 0

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August 1, 1994

The U.S. Environmental Protection Agency and the Washington State Department of Ecology reviewed the revised *Remedial Investigation and Feasibility Study Report for the Environmental Restoration Disposal Facility*, DOE/RL-93-99, *Proposed Plan for the Environmental Restoration Disposal Facility*, DOE/RL-94-47, Rev.0, the *Corrective Action Management Unit Application (CAMU) for the Environmental Restoration Disposal Facility*, DOE/RL-94-40, Rev. 0, and the *NEPA Roadmap for the Environmental Restoration Disposal Facility*, DOE/RL-94-41, Rev. 0. General comments on the regulatory package are followed by comments on the *Remedial Investigation and Feasibility Study Report*.

GENERAL COMMENTS

The decision has been made to pursue a CERCLA landfill authorization for the ERDF. Based on this new pathway, the appropriateness of the CAMU Application is questionable. The application contains supporting documentation for many NEPA values. The application should either be revised as a supporting document or the NEPA values should be incorporated into the RI/FS or NEPA roadmap.

Response: Major NEPA values will be incorporated into the RI/FS

Both the RI/FS and the NEPA Roadmap should be revised to refer to the ERDF as a CERCLA landfill. All discussions of CAMU should be deleted.

Response: Accept.

The DOE response to scoping comments should be included in the NEPA roadmap.

Response: DOE will look through the general comment responses provided on the major topics submitted to the Public to determine which may be appropriate for inclusion.

The Proposed Plan is well written and concise. All references to CAMU need to be removed. The barrier alternatives should be discussed with a preferred RCRA compliant barrier proposed. A barrier alternative is undergoing design development. This barrier design should be discussed in the proposed plan and, if not found in the RI/FS, supporting documentation should be made available.

Response: Accept. The general design will be added to the RI/FS and discussed in the Proposed Plan.

Additional information should be provided in the proposed plan concerning site selection. The discussion of the preferred site should contain sufficient detail of the evaluation to support the determination made concerning this site.