



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10 HANFORD PROJECT OFFICE
712 SWIFT BOULEVARD, SUITE 5
RICHLAND, WASHINGTON 99352

September 26, 1995

Mr. Phillip Staats
Washington State Department of Ecology
1315 W. 4th Avenue
Kennewick, WA 99335-6018

Re: *Comments on the Description of Work for the Vadose Zone Characterization of the 1301-N and 1325-N Liquid Waste Disposal Facilities*

Dear Mr. Staats:

The U.S. Environmental Protection Agency has completed the review of the *Description of Work for the Vadose Zone Characterization of the 1301-N and 1325-N Liquid Waste Disposal Facilities*. We are providing comments on this document as the supporting agency to Ecology. 42057

If you would like to discuss any of the comments, please call me at (509) 376-4919.

Sincerely,

A handwritten signature in black ink that reads 'Pamela L. Innis'.

Pamela Innis
EPA Support Unit Manager

Attachment

cc: **Administrative Record (100-NR-1, Record File Only, Not for Distribution)**



Introduction

The U.S. Environmental Protection Agency has completed the review of the *Description of Work for the Vadose Zone Characterization of the 1301-N and 1325-N Liquid Waste Disposal Facilities, (Rev 0)*, dated September 1995. This document was submitted by the Department of Energy September 1995.

General Comment

The regulatory agencies request an opportunity to review the SOW specific to the drilling of 1301-N and 1325-N prior to initiation of drilling operations.

Specific Comments

Section 1.1, page 1: Delete the third sentence regarding the SAFER process. No detail is provided to support this statement in the DOW.

Section 1.1, page 4: The DOW should distinguish that Ecology is the lead regulatory agency for this project.

Section 2.2, page 9: The prescribed procedure for handling investigation derived waste is *Section 4.0, "Waste Management" (BHI 1995g)*. The agreed to procedures for handling of investigation derived waste are included in EIP 4.3. These procedures have been reviewed and approved by the regulatory agencies. Deviation from using these procedures shall be discussed with the regulators.

Section 3.0, page 10: Typos: 3rd paragraph, 3rd sentence: "decreases from pCi/g to pCi/g" change to "continue to decrease to the low pCi/g range". 4th paragraph, second sentence: change "4.6 m" to "12 m".

Section 3.0, page 10, 5th paragraph: Describe the engineered barriers noted in this paragraph and differentiate between an engineered barrier and a drilling pad or reducing exposure time through ALAR work practices.

Section 3.2.1, page 11, second paragraph: If hard tooling is used (with water added), describe how the well site geologist will determine the location of the capillary fringe. It is my understanding that the intent is not to penetrate into the water table.

Section 3.2.1, page 12, second paragraph: Describe in detail how the determination will be made on "hot" versus "not hot" and how the handling procedures will vary between the two. It should be considered to handle all material as suspect contaminated (or hot) until lab analyses are made. Field screening methods may not be accurate and material may be inappropriately handled. Provide additional information on the scintillation methods to be used in the field. Additionally, it is unclear how hazardous components will be considered in waste handling.

Section 3.2.2, page 12: Timing on the abandonment procedure should be noted, i.e., prior to start of drilling.

Section 3.3.1, page 14: It is my understanding that Ecology will not be taking split samples for this project in order to reduce radiological exposure to workers and eliminate shipping concerns.

Section 3.3.1.2, page 14 and 15: It is recommended that the FTL use best judgement in determining when not to take physical samples due to radiological concerns.

Section 3.3.2, page 15: The method for storing archive samples should be further described in this section, to include the methods for assuring that the sample jars will be protected, contained to eliminate accidental breakage spills, and inspected.

Section E.3.1, page E-11, last paragraph: The justification for determining that grab samples will be taken if activity is three times that of the previous drive barrel should be provided.

Section E.3.2.2, page E-12: Depth accuracy should noted for grab samples obtained from the drive barrel cuttings.

Section E.3.2.2, page E-13: The radiation levels specified in the RWP should be noted in the DOW or SOW and initial procedures and contingencies considered to eliminate significant delay of the project.

Section E.3.2.2, page E-13: The laboratories to be used for sample analysis shall be approved by Ecology prior to initiation of field activities.

Section E.3.2.2, page E-13, last paragraph: It is my understanding that Ecology will not be taking samples on this project.

Section E.3.2.2, page E-14: It should be noted that materials greater than 7.62 cm will be considered when determining overall grain size distribution.

Section E.4, page E-15: An additional cross contamination problem that should be listed is improper decontamination of equipment prior to sampling or between sampling events.