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Stacy Charboneau
U.S. Department of Energy
Richland Operations Office (A6-33)
P.O. Box 550
Richland, WA 99352

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EDMC

Dear Stacy Charboneau:

Subject: Comments on EE/CA for 232-Z Facility

I support the choice of recommended Alternative Two in *Engineering Evaluation/Cost Analysis for the Removal of the Contaminated Waste Recovery Process Facility*, DOE/RL-2003-29, Rev. 2, November 2003. The use of ERDF, a lined waste disposal facility that can accept CERCLA waste generated anywhere on the Hanford Site, is very important to me. The LLBG for LLW disposal is unlined, which is not acceptable, and is also more costly. Also, do the removal now; do not delay removal until after years of expensive S&M and costs have escalated. 60910

I agree with the second and third paragraphs of Section 3.0 regarding the underground ductwork and drain line exiting the 232-Z Facility below grade. Any further remediation work, beyond covering the slab with a fixative to eliminate the potential for exposure or release of radioactive or hazardous materials, should be coordinated with and be fully compatible with the PFP Decommissioning project closeout.

General Comments on the EE/CA

Figures such as "Z Plant Complex in 200 West Area," plus a floor plan and elevation view(s) of the 232-Z Facility to support Section 2.2 would have been very helpful. The word description is insufficient for anyone to visualize (e.g., the general public) not already familiar with the Z Plant Complex including the 232-Z Facility.

The Rev. 2 draft EE/CA was published in November 2003, which was already into FY 2004. The EE/CA should have updated pages 14 & 22, plus Tables 3, C-1 & C-2.

Section 7.0 References omits many Code of Federal Regulations citations: e.g., to 10 CFR 61 & 835; 29 CFR 1910, 1920 & 1926; 40 CFR 61, 300 & 761; 50 CFR 502 & 761 used in EE/CA Section 5.1.3.x. A few other citations are also missing.

There are some errors in word usage. The fourth line on page 14 should be soil rather than /spoil. The fourth line after the assumption table on page C-3 should be from rather than form. The fifth line in block 2, page D-2, should be of rather than f. Punctuation is also an occasional problem.

Sincerely,

Les Davenport
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