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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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May 14, 1998

Ms. Arlene Tortoso
U.S. Department of Energy
P.O. Box 550, MSIN: HO-12
Richland, WA 99352



Dear Ms. Tortoso:

49130

Re: Washington State Department of Ecology comments: "100-HR-3 and 100-KR-4 Operable Units Interim Action Performance Evaluation Report (DOE/RL-97-96, Rev. 0, April 1998)"

The Washington State Department of Ecology (Ecology) submits the enclosed comments on the above referenced document. Overall, the document is well written and covers the subject matter appropriately. The comments pertain more to the details of the document rather than to the overall quality.

If you should have any questions regarding this letter or the enclosed comments, please contact me at (509) 736-3049.

Sincerely,

Wayne W. Soper, P.G.
100 H Area Project Manager
Nuclear Waste Program

WWS:sdb
Enclosure

cc: Larry Gadbois, EPA
Mary Lou Blazek, ODOE
Administrative Record: 100-HR-3 and 100-KR-4

Comments:

Generally, the document is well written and laid out in a clear, easy to follow format. The tables are also very clear and helpful.

Ecology recommends a milestone be established for the next performance report. EPA's suggestion of September 1999 is suitable.

Page ES-1, first paragraph: Although the statement is correct that in the QRA the standard applied is EPA's AWQC, you may want to quote the HR-3/KR-4 ROD. The standard used is WAC 173-201A-040 which is a State of Washington AWQC.

Page ES-4, first partial paragraph: What is the plan to capture this portion of the plume in the H Area that may be reaching the river?

Page 1-1, first paragraph: See comment 1.

Page 3-16, second paragraph, first sentence: Probably just a typo, but total chromium should read hexavalent chromium.

Page 3-24, last paragraph: Ecology recommends reviewing the capture analysis of the D Area pumping wells. It appears that adding well D8-5 or well D8-55 could greatly enhance the plume capture zone in this area.

Page 3-26, second full paragraph: Ecology agrees that a short-term monitoring program with more frequent sampling should be implemented.

Page 5-2, second paragraph from the bottom: This issue appears throughout the document. Storage of spent resin at CWC is very costly. This is something we should try to avoid. We need to develop a plan to treat the resin so that we can dispose of it in ERDF.