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

November 5, 1993

Paul Pak
U.S. Department of Energy
P.O. Box 550 MS A5-19
Richland, Washington 99352



Re: Comments on 200 ZP-1 Proposed Plan

Dear Mr. Pak:

The U.S. Environmental Protection Agency, Washington State Department of Ecology, and our contractors have completed our review of the Proposed Plan for 200-ZP-1. Our comments are enclosed.

These comments have been transmitted electronically to you via HLAN. If you have any questions feel free to call me at (509) 376-8631.

Sincerely,

Dennis Faulk
Unit Manager

Enclosure

cc: Becky Austin, WHC
Dib Goswami, Ecology
Administrative Record (200-ZP-1 OU)



509-376-8631

General Comments 200-ZP-1 Proposed Plan

- The document should be checked throughout to assure that it is understandable to the public. Many areas lack sufficient detail for the reader to get much sense of why certain alternatives are proposed.
- The proposed plan should include engineering details for the development and selection of the preferred alternative. For example, bioremediation is a possible alternative, but is not discussed. As stated in the meeting held on October 14, 1993; EPA does not want to rule out the use of innovative technology during this IRM. The document should be written in a flexible enough manner to allow for the use of innovative technology if deemed appropriate.
- The proposed plan should include a statement that comments are encouraged on all of the alternatives, not just the preferred alternative.
- The glossary included in the plan is helpful. Several terms, however, should be added including pump and treat, contaminant plume, and groundwater mound.
- The discussion on in-well sparging should be expanded to discuss that in well sparging has a limited zone of influence but may be effective in areas of high contaminate concentrations. This discussion should be expanded to the preferred alternative section also.
- The text on page 8 lists the evaluation criteria, but definitions are not included. This section should be expanded to include a brief definition of each evaluation criterion or the criteria should be included in the glossary.
- The descriptions of Alternatives 3 and 4 on page 12 should briefly explain the above-ground treatment technologies for extracted vapors and groundwater.
- The explanation of how ARARs will be addressed which appears at the beginning of page 11 should be added to the ARARs discussion on page 10.
- The proposed plan identifies the preferred alternative after the Evaluation of Alternatives section. EPA guidance recommends identifying the preferred alternative before the comparison discussion. The preferred alternative should thus be inserted on page 8 after alternative 4. This discussion should identify the preferred alternative, indicate that it is a preliminary choice, and that details follow later in the document.

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- There is an apparent discrepancy on page 10 of the plan. The text states that "the two technologies [pump and treat and in-situ sparging] are readily available," whereas earlier the plan states that "In-situ sparging is still in the later stages of development, so its implementability is not fully established." This discrepancy should be corrected.
 - This IRM appears not to commit past the pilot scale test. A contingency plan , if the treatability/pilot scale study does not achieve the desired goal, should be provided in the report.
 - The IRM Plan should mention where and how the detailed information on the various technical aspects of the pilot scale studies will be provided. The text should indicate information regarding the initial pumping rate, the treatment trains, etc.
 - Regarding clean up goals the section should state that the potential to clean this groundwater up to regulatory limit of 5ppb for carbon tetrachloride is highly unlikely. The goal of this IRM is to contain the plume to the 200 West Area.
 - On page 12 IBM should be changed to IRM.

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Enclosure is the same as outgoing letter #9358183D, tmp-6-5813.

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