

# START

United States  
Environmental Protection  
Agency

Region 10  
Hanford Project Office  
712 Swift Boulevard, Suite 5  
Richland WA 99352

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April 1, 1992

Darci Teel  
Washington State Department  
of Ecology  
7601 W. Clearwater, Suite 102  
Kennewick, Washington 99336

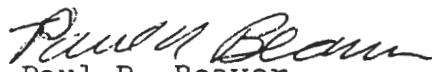
Re: Comments for 100-DR-1 Operable Unit

Dear Ms. Teel:

The U. S. Environmental Protection Agency, as support agency, has reviewed the 100-DR-1 Operable Unit work plan. Enclosed please find our comments.

If you have any questions, please call me at (509) 376-8665.

Sincerely

  
Paul R. Beaver  
Unit Manager

Enclosure

cc: Administrative Record (100-DR-1)



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## GENERAL COMMENTS

DOW should discuss how waste will be handled and what precautions will be taken if high levels of contaminants are found. The level that constitutes high level should also be addressed.

All acronyms need to be spelled out at least once.

Background levels for organics and radiation should be recorded in a field logbook.

Section 3.2.2.2 Field Screening should come before Sampling Procedures.

EPA recommends that stakes be used to show the locations of contamination with the highest recorded value in that area on the stake. This may prove helpful during future cleanup operations.

Comment Section 3.1.4, page 4

- \* Field equipment is not specified in the DOW.
- \* The manufacturers recommendations are not included in the DOW. They should be made available in the DOW or Work Plan.
- \* A sampling date needs to be included in the DOW either in this section or in section 7.0.
- \* Chain of Custody for sampling is not addressed in this section.
- \* Dow does not explain how the waste will be handled. (ie; with protective gloves...etc.)

Comment figure 3, page 6

- \* North arrow is not included in the figure and should be included.

Comment Section 3.2.3, page 8

- \* If excavated soil is highly contaminated, what will be the course of action?  
Either the soil should be placed in a container. Or if it is returned to the test pit, a cover should be placed over any disturbed area where contamination is found to prevent further exposure through wind and rain.

Comment Section 3.2.4., page 8

- \* The organic screening criteria is not listed or referenced any where in the DOW.

Comment Section 3.2.2.2, page 11

- \* The second paragraph contains the sentence "The volatiles will be screened using an OVA". What is an OVA? Should this be OVM? OVA is listed a second time in this paragraph also.

Comment Section 3.3.3, page 12

- \* The second paragraph contains an acronym, HSO. What is an HSO?

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## CORRESPONDENCE DISTRIBUTION COVERSHEET

Author	Addressee	Correspondence No.
P. R. Beaver, EPA	D. Teel, Ecology	Incoming 9203105

Subject: COMMENTS FOR 100-DR-1 OPERABLE UNIT

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