



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
 REGION 10 HANFORD/INL PROJECT OFFICE

309 Bradley Boulevard, Suite 115
 Richland, Washington 99352

August 9, 2010

Rich Holton, Assistant Manager
 for the Central Plateau
 U.S. Department of Energy
 Richland Operations Office
 P.O. Box 550
 Richland, Washington 99352

Re: FIELD TEST PLAN FOR THE SOIL DESICCATION PILOT TEST, DOE/RL-2010-04,
 DRAFT A

Dear Mr. Holton:

The United States Environmental Protection Agency (EPA) has comments on the above referenced document. Because this document is an extension of the workplan, it requires EPA approval.

It is our goal to have our comments addressed in the most efficient way possible. We are enclosing them with the transmittal of this letter and would like to meet with you and your staff to answer any questions you may have.

Please feel free to contact me at (509) 376-3749 or Craig Cameron (509) 376-8665 to set up a meeting or if you have any questions.

Sincerely,

Rod Lobos
 Remedial Project Manager

Enclosure : Field Test Plan for the Soil Desiccation Pilot Test Comments

cc: Nina Menard, Ecology
 Ken Niles, ODOE
 Russell Jim, Yakama Nation
 Stuart Harris, CTUIR
 Gabe Bohnee, Nez Perce Tribe
 Administrative Record: (200-BC-1)

RECEIVED
 AUG 10 2010

EDMC

200-BC-1

**EPA Comments on the Field Test Plan for the Soil Desiccation Pilot Test
DOE/RL-2010-04 Draft A**

General Comments

1. The test plan is being conducted as part of the 200-BC-1 OU RI/FS process. The plan needs to clearly state that this test is being conducted to determine if desiccation is a viable technology as part of the RI/FS for 200-BC-1. The plan needs to include these links. As an extension of the work plan, the document should be transmitted for review and approval. Not for review and comment.
2. The 200-BC-1 waste control plan needs to be updated to account for various waste streams including Tc-99 that will be generated as part of this test.
3. Text should be provided that discusses how the earlier testing removed technetium out of the ground. The excavation treatability test should be acknowledged, and any information gained from it that is being used for this test should be described.
4. The test plan needs a more complete discussion of modeling that will be included as part of this test. Without certain modeling activities discussed, there is a critical link that is missing, i.e. modeling for vapor rehydrating desiccated soil many years into the future.
5. Appendix A needs to be pulled into the corresponding appropriate places in the document, i.e. the (A2.1 Project Management) in Appendix A should be placed in Section 14, Management and Staffing. The main contents of the appendix must be placed in Section 6 and the appendix then needs to be deleted.

Specific Comments

1. *Page 1-1, Section 1.* The first sentence is awkward, it should be rewritten.
2. *Page 1-1, Section 1.1* The abbreviation (OU) should be replaced with 200-BC-1
3. *Figure 1-1* is not legible; it needs to be made clear.
4. *Page 1-2, Section 1.2, last paragraph.* Shallow soil contaminated with mobile contaminants can also pose a threat to groundwater. The last paragraph only mentions deep threats. It should also mention shallow soil contaminated with mobile constituents that pose a groundwater threat, i.e. Tc-99. Shallow soils are easily reachable using conventional excavation methods. The excavation treatability test should be mentioned in the text.
5. *Page 1-3, Section 1.2, last sentence.* Please provide additional context about the development of a model and just what it will be used for.

6. *Page 2-1, Section 2, last paragraph.* How does the test account for the diffusion process? It should be described if modeling would be done to account for this. Please explain how this will be accounted for.
7. *Page 4-29, Section 4.2.1.3 Conclusions.* The simulations conducted did not account for either vapor transport or infiltration conditions at the boundary. Future model runs (simulations) should account for these additional considerations. These additional considerations need to be looked at for analysis of the desiccation technology.
8. *Page 4-46, Figure 4-33.* Please show the location and label #12. It is not shown on the figure.
9. *Page 4-50, Section 4.2.2.3, last paragraph.* It should be noted in the text that the post-desiccation portion of the test can be done as part of the final remedy.
10. *Page 7-1, Section 7.* The Data management section should contain pertinent information from Appendix A. See General Comment #5 for related actions for Appendix A.
11. *Page 9-1, Section 9.* The language about the air monitoring plan needs to mention that it must be approved by EPA.
12. *Page 10-1, Section 10.* The Waste Management section should discuss any updates needed to the waste control plan for the various waste streams, including Tc-99.
13. *Page 11-1, Section 11, first paragraph.* The text needs to be clarified as "DOE and the office of river protection" is listed in the text. It does not make sense and needs to be rewritten because both RL and ORP are part of DOE.
14. *Page 11-1, Sections 11.1.2 and 11.2.* It should be clarified that the proposed plan actually contains the proposal that the public is commenting on. They can comment on the feasibility study, but the comments on the proposal are the comments that must be addressed officially in the responsiveness summary that is included with a Record of Decision.
15. *Page 13-1, Section 13.* The Schedule should contain more detail. It should include the project schedule diagram (e.g., Gantt chart). The schedule should show drilling of wells, sample collection, etc.
16. *Page 13-1, Section 13.* The Central Plateau change package has related milestone dates for deep vadose zone technology development and testing activities. There is no mention of those tentatively agreed to commitments in the text. It would be helpful to the reader to describe the expectations that come out of the proposed changes.
17. *Page 14-1, Section 14.* The management and staffing section should include detail. The descriptions in Appendix A should be placed here. The roles of DOE and EPA are not mentioned, but should be explained in this section.

18. *Page 15-1, Section 15.* The budget section is lacking specific cost information (really it is lacking any cost information). Please include costs to date as well as what has been budgeted for the various aspects of this test plan.

Specific comments to Appendix A that will need to be incorporated into the body of the plan

19. *Page A-13, Section A2.1.1.* The roles of DOE and EPA are not listed. The roles of DOE and EPA need to be described in the text. It should include the approval of the document.
20. *Pages A-25-31, Section A3.1 and Table A3-1.* There is no description of any soil sampling in any of holes 1-12. It seems that this has been inadvertently been omitted from the test plan. A description of how baseline soil data will be obtained needs to be included. If there are no plans to sample soil in holes 1-12, then a rationale for not taking soil samples needs to be included in the text.
21. *Page A-32, Figure A3-2.* Please clarify in the text why the cluster for #12 cannot be located specifically at this time.
22. *Page A-37, Table A3-6.* Leaving sampling locations in the table as TBD could have consequences of no samples being taken. There needs to be a minimum number of sediment samples listed. The number should be at least enough to be statistically meaningful. Instead of saying that the locations are "TBD", the footnote should describe the process and timing for determining the locations and explain that EPA and DOE will need to approve the locations and number of samples.