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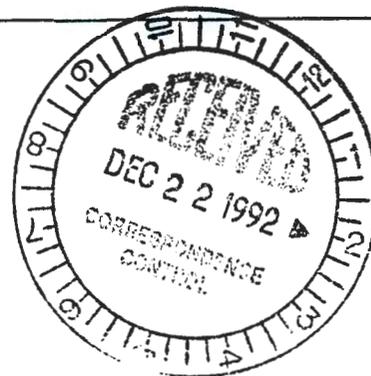
United States
Environmental Protection
Agency

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

9208791



December 8, 1992



Robert K. Stewart
U.S. Department of Energy
P.O. Box 550, MS A5-19
Richland, Washington 99352

Re: White Bluffs Pickling Acid Crib Expedited Response Action
Project Plan

Dear Mr. Stewart:

Enclosed are the combined comments from the U.S. Environmental Protection Agency (EPA) and Washington Department of Ecology (Ecology) on the technical and regulatory content of the White Bluffs Pickling Acid Crib Expedited Response Action Project Plan (WHC-SD-EN-AP 113, Rev. 0). These comments were submitted informally via cc:mail on November 5, 1992. The regulators met with Westinghouse and Department of Energy personnel and resolved the comments prior to the initiation of field work.

Also enclosed is a copy of Ecology's comments, as the support agency, for inclusion into the Administrative Record. A separate response to these comments is not required.

If you have any questions or concerns regarding these comments, please contact me at (509) 376-4919.

Sincerely,

Pamela S. Innis
Unit Manager



Enclosure

cc: D.R. Jansen, Ecology
D.C. Teel, Ecology
B.A. Austin, WHC
W.L. Johnson/J.M. Frain, WHC
A. DeAngeles, PRC
B. Drost, USGS
Administrative Record, Pickling Acid Crib ERA



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The U.S. Environmental Protection Agency has reviewed the White Bluffs Pickling Acid Crib Expedited Response Action Project Plan (WHC-SD-EN-AP-113, Rev. 0). The comments presented below are based on a comprehensive technical review of the project plan and sampling and analysis plan. The comments include those presented by the Washington Department of Ecology and the agencies' contractors.

Specific Comments

1. **Comment/Recommendation: Section 1.2, page 1.**
The location (if known) of the pipe fabrication facility that fed waste to the cribs should be listed.

2. **Comment/Recommendation: Section 3.2, page 3.**
The text states that information from preliminary investigations are not "accurate enough to conduct field work, but will provide tentative sample locations which will be verified for site-specific sampling". The description of the verification process should be provided.

3. **Comment/Recommendation: Figure 2, page 4.**
The legend should describe the type of utility lines, and if they are above or underground.

4. **Comment/Recommendation: Section 3.4, page 5.**
Due to the type of material located on the surface of the cribs, nonintrusive soil sampling at a depth of 1 foot or less would be difficult. Is the gravel going to be excavated to the soil horizon prior to sampling? Please clarify how surface sampling will occur.

5. **Comment/Recommendation: Section 3.4, page 5, 8th sentence**
This sentence states that the test pit may be expanded to a trench "depending on initial sampling results". It is unclear whether these result are from field screening interpretations or analytical lab results. Please clarify this statement.

6. **Comment/Recommendation: Section 4.1, page 5.**
In the third sentence, "a lower Ph" should replace "an elevated pH".

The paragraph states that "it is suspected that the acid would have been neutralized prior to disposal". What specifically raises the suspicion that the acid was neutralized? Past standard practices? Historical information? Are there any indications as to the type of material used to neutralize the acid?

7. **Comment/Recommendation: Section 4.2, page 6**
The selection criteria used in screening alternatives should be expanded

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to include: protection of human health and the environment, attainment of ARARs to the extent practicable, utilization of permanent solutions to the maximum extent practicable, and implementability.

8. **Comment/Recommendation:** Section 5.2, page 6, paragraph 2.
Changes will be filed as an Engineering Change Notice (ECN), and a copy will be inserted into the ERA project file. Copies will be submitted to the regulatory agencies and the appropriate field personnel within 10 days of the change.

9. **Comment/Recommendation:** Attachment 1, Section 3.3, page A1-4.
The criteria for screening soil is inadequate. It is more effective to continually screen soils as they are removed from the test pit. Characteristics such as discoloration and elevated moisture content are judgmental and do not necessarily address the contaminants of concern.

The text states that an OVM will monitor for volatile organics and positive readings above background will indicate the need for sample collection. The method mentioned above does not seem to be the best procedure to determine whether a sample should be taken because the contaminants of concern are mostly non-organic.

10. **Comment/Recommendation:** Figure 1-1, page A1-5
The legend in this figure should identify sample locations.

11. **Comment/Recommendation:** Section 3.5, page A1-6
It may be prudent to sample at the south end of both trenches to identify a preliminary extent of contamination.

The anomaly at the south end of the west trench should be examined and may require sampling.

12. **Comment/Recommendation:** Section 3.6, page A1-7
The second paragraph states that trenches will be excavated across the crib. It should be specified to what depth sampling will occur. Also, it should be clarified if samples will be taken at more than one interval beneath the pipes (ie. directly beneath, 1 foot beneath) with final sampling at 5 feet beneath the piping. Additionally, the last sentence needs to specify when it will be necessary to apply the methodology to site E. EPA recommends that sampling occur at site E at least in the center for both a surface soil sample and a five foot interval sample.

The sampling at site D noted in the third paragraph specifies only surface sampling. Justification should be given for not sampling at depth. Also, the authoritative sampling method mentioned in the third paragraph should be specified.

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13. **Comment/Recommendation:** Attachment 1, Section 8, page A1-9
This section should specify how drums of investigation derived waste will be stored and should be consistent with EII 4.3. Also, inspection of drums should be consistent with EII 4.3.

14. **Comment/Recommendation:** Attachment 1, Table 1-1, page A1-9.
Under "Parameters of Interest", TAL Metals could replace ICP Metals, eliminating the need to add lead as a specific analysis.

Nitrite/Nitrate could be moved under "Anions".

The table notes analyses for "selected" samples. The text should specify how the samples will be selected and how many samples fall under this category.

15. **Comment/Recommendation:** Attachment 1, 7.0, page A1-11, paragraph 2.
Changes will be filed as an Engineering Change Notice (ECN), and a copy will be inserted into the ERA project file. Copies will be submitted to the regulatory agencies and the appropriate field personnel within 10 days of the change.

16. **General Comment**
There is some concern on the migration of chrome. Given the scarce data available on amounts of solution discarded to the acid cribs, it is feasible that chrome may have migrated much further than 5 feet and may be tied up in the deeper soils or gone through to the aquifer. Would it be appropriate to extend one trench deeper to check this theory? What is the available data for groundwater wells in the area?

Typographical Errors

Change the word "will" to "shall" throughout the project plan and sampling plan where appropriate. "Will" implies that the action is implemented when a person has the inclination to do so.



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

1000 University Street • Seattle, WA 98101 • (206) 463-3000

October 30, 1992

Ms. Pam Ennis
U.S. Environmental Protection Agency
Region 10
712 Swift Boulevard, Suite 5
Richland, WA 99352

Dear Ms. Ennis:

Re: Comments on the White Bluffs Pickling Acid Crib
Expedited Response Action Project Plan

The attached are comments related to the ERA Project Plan for the White Bluffs Pickling Acid Crib (WHC-SD-EN-AP-113, Rev. 0). Please incorporate these comments with your own. Comments on the document are due at DOE on Friday, November 6, 1992.

Please feel free to contact me at our Kennewick Office (546-2968) if you have any questions about my comments.

Sincerely,

Jeff Phillips
Environmental/Unit Manager
Nuclear and Mixed Waste Management Program

JP:mf
Enclosure

cc: Darci Teel, Ecology
Tim Veneziano, WHC

HANFORD PROJECT OFFICE
NOV 2 1992
ENVIRONMENTAL PROTECTION
AGENCY

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Comments and Recommendations on the
White Bluffs Pickling Acid Crib Expedited Response Action
Project Plan (WHC-SD-EN-AP-113, Rev. 0)

Specific Comments

1. Comment/Recommendation: Section 1.2, page 1.

The location (if known) of the pipe fabrication facility that fed waste to the cribs should be listed.

2. Comment/Recommendation: Section 2.0, page 2, paragraph 2.

It should be clear which areas are within the scope of this project plan and which areas will be investigated as part of the 100-IU-2 Operable Unit.

3. Comment/Recommendation: Section 3.0, page 3.

The results from "activities already conducted" (ie. GPR) have not been provided, as the text states.

4. Comment/Recommendation: Section 3.2, page 3.

The text states that information from preliminary investigations are not "accurate enough to conduct field work, but will provide tentative sample locations which will be verified for site-specific sampling". The description of the verification process should be provided.

5. Comment/Recommendation: Figure 2, page 4.

The legend should describe the type of utility lines, and if they are above or underground.

6. Comment/Recommendation: Section 3.4, page 5.

Due to the type of material located on the surface of the cribs, nonintrusive soil sampling at a depth of 1 foot or less would be very difficult.

7. Comment/Recommendation: Section 4.1, page 5.

In the third sentence, "a lower Ph" should replace "an elevated pH". It is suspected that the acid would have been neutralized prior to disposal. What was used to neutralize the acid?

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8. Comment/Recommendation: Section 4.2, page 6.

It is unclear how information from characterization activities put into a database will help in the evaluation of initial response actions and feasibility alternatives.

9. Comment/Recommendation: Section 5.2, page 6, paragraph 2.

Changes will be filed as an Engineering Change Notice (ECN), and a copy will be inserted into the ERA project file. Copies will be submitted to the regulatory agencies and the appropriate field personnel within 10 days of the change.

10. Comment/Recommendation: Attachment 1, 3.2, page A1-4.

It is suspected that the acid would have been neutralized prior to disposal. What was used to neutralize the acid?

11. Comment/Recommendation: Attachment 1, 3.6, page A1-7, paragraph 1.

The text states that an OVM will monitor for volatile organics, and positive readings above background will indicate the need for sample collection. The method mentioned above does not seem to be the best procedure to determine whether a sample should be taken because the contaminants of concern are mostly non-organic.

12. Comment/Recommendation: Attachment 1, Table 1-1, page A1-9.

Under "Parameters of Interest", TAL Metals could replace ICP Metals, eliminating the need to add Lead.

Nitrite/Nitrate could be moved under "Anions".

13. Comment/Recommendation: Attachment 1, 7.0, page A1-11, paragraph 2.

Changes will be filed as an Engineering Change Notice (ECN), and a copy will be inserted into the ERA project file. Copies will be submitted to the regulatory agencies and the appropriate field personnel within 10 days of the change.

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CORRESPONDENCE DISTRIBUTION COVERSHEET

Author: P. S. Innis, EPA Addressee: R. K. Stewart, RL Correspondence No.: Incoming: 9208791
 Subject: WHITE BLUFFS PICKLING ACID CRIB EXPEDITED RESPONSE ACTION PROJECT PLAN

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