



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10 HANFORD PROJECT OFFICE  
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November 28, 2001

Arlene Tortoso  
Project Manager  
U.S. Department of Energy  
Richland Operations Office  
P.O. Box 550, A6-38  
Richland, WA 99352

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EDMC

RE: EPA and Ecology Comments on the Proposed Plan for the Canyon Disposition Initiative  
(221-U Facility [DOE/RL-2001-29 Draft B])

Dear Ms. Tortoso:

Enclosed are the joint comments from the Washington State Department of Ecology (Ecology) and the U.S. Environmental Protection Agency (EPA) on the Canyon Disposition Initiative Proposed Plan (DOE/RL-2001-29 Draft B).

The EPA and Ecology require further review which will likely result in changes to the Proposed Plan beyond the resolution of the attached comments. To maintain consistency with the Proposed Plan, the Final Feasibility Study may also need revisions based on continuing review.

If you have any questions, feel free to contact either of us.

Sincerely,

Matt Mills  
Ecology Unit Manager

Craig Cameron  
EPA Project Manager

Enclosure

cc: Gary MacFarlan, BHI  
Charles Hedel, CHI  
Admin. Record - Canyon Disposition Initiative

EPA AND ECOLOGY COMMENTS ON THE  
PROPOSED PLAN (DRAFT B) FOR THE  
CANYON DISPOSITION INITIATIVE  
(221-U FACILITY)

November 28, 2001

General Comments

1. There were a few changes made to the final Feasibility Study that were not consistently followed in this Proposed Plan. The specific comments provided below help to remedy this inconsistency, and address other issues and typographical errors.

Specific Comments

1. *Page 1. Second paragraph.* The US Environmental Protection Agency (EPA) and Washington State Department of Ecology (Ecology) are joint lead agencies for the Canyon Disposition Initiative (CDI) 221-U Facility interim remedial action. Please correct.
2. *Page 1. Announcement entitled, "Mark Your Calendar."* In the sentence "A public hearing...", replace the word "hearing" with "meeting."
3. *Page 1. Announcement entitled, "Mark Your Calendar."* Add Matt Mills and his agency and address along with the EPA contact with an "or" in between.
4. *Page 1 & 2 Last sentence on page 1 that carries over to page 2.* This statement neglects the fact that completely different alternatives may be chosen for the other four facilities. While the work on the U-Plant interim remedial action will serve to facilitate the disposition of the other four facilities, there are still many regulatory and technical challenges that warrant the development of individual decision documents for each facility. Please address these issues fully.
5. *Page 6. Site Characteristics section, first paragraph.* Need to include the Future Site Uses Working Group report as another source along with the HCP-EIS. The land use language in this paragraph is satisfactory.
6. *Page 6. Human Health Risk.* Remove the sentence beginning, "Based on current..." The term "excess cancer risk" used earlier in the paragraph is sufficient enough to differentiate between the baseline cancer risk and that posed from the alternatives.
7. *Page 7 Industrial Scenario section, first paragraph.* Sentence beginning, "All of the radionuclides present...", this sentence is not correct. According to Table 1, not all of the radionuclides have a risk of  $10^{-2}$ . Please clarify.

8. *Page 8. Ecological Risk section, first paragraph.* Replace the sentence beginning, "The area immediately...", with the sentence "The area immediately surrounding the 221-U Facility is highly disturbed and thus provides reduced-quality habitat for ecological communities and the establishment of food webs with a hierarchy of terrestrial receptors."
9. *Page 8. Ecological Risk section, second paragraph.* Replace the first sentence to be consistent with the final Feasibility Study. It should be replaced with "The level of safety required for the protection of all human individuals is believed to be adequate to protect other species, although not necessarily individual members of those species."
10. *Page 8. Ecological Risk section, second paragraph, last sentence.* Replace this sentence with "The placement of an environmental cap under containment alternatives would be designed to sever all exposure pathways, thus greatly reducing the probability and degree of impacts to human and ecological receptors."
11. *Table 3.* The footnote "h" does not appear in the table itself. Footnote "g" is not even pertinent to Table 3. Please correct.
12. *Page 12. Sections describing alternatives 3 and 4.* Waste volumes do not add up correctly. Note that 10,100 m<sup>3</sup> plus 50,100 m<sup>3</sup> does not add up to 64,000 m<sup>3</sup>.
13. *Page 12. Alternative 3 section, second paragraph.* Biotic intrusion is mentioned twice.
14. *Page 12. Alternative 3 section, second paragraph, last sentence.* The sentence should read, "The sides of the cap include 0.6 m (2 ft) of basalt riprap."
15. *Page 12. Alternatives 3 and 4 sections.* Incorporate or reference the fact that the caps fulfill seismic requirements and that this contributes to their size.
16. *Page 12. Alternative 4 section.* Incorporate or reference the placement of the dual-liner/leachate collection system.
17. *Page 18. Implementability section, third paragraph, last sentence.* This sentence is missing some words.
18. *Page 18. Costs section, first sentence.* Delete the reference to offset costs.
19. *Page 20. Summary of the Preferred Alternatives section, first paragraph.* In the sentence beginning, "Alternative 6 provides...", remove the words "or redisposal".
20. *Page 20. Summary of the Preferred Alternatives section, second paragraph.* Remove the second paragraph. While this statement has been recognized by the Tri-Parties, it is outside the scope of this proposed plan.
21. *Page 23. Points of Contact.* It's "Tortoso", not "Tortosa".
22. *Page 24. Definition of Institutional Control.* Replace "general category of remedial alternatives that do not" with "component of remedial alternatives that does not".