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February 26, 2008

Mr. Larry Romine
 U.S. Department of Energy
 Richland Operations Office
 P.O. Box 550, A6-33
 Richland, WA 99352

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EDMC

Dear Mr. Romine:

I have reviewed the *BC Controlled Area Waste Site Engineering Evaluation/Cost Analysis*. I have the following comments:

1. Unless the source of the contamination is removed or controlled first (the cribs and trenches in the area), recontamination of the BC Controlled Area will occur via plant uptake and wind and animal dispersion. To undertake a removal action in the BC Controlled Area until the sources are mitigated is simply a waste of money.
2. The flora and fauna (particularly the flora) description in the EA appears to be a description of the general habitat of the Hanford plateau rather than the current condition of the BC Controlled Area itself. The BC Controlled Area was re-vegetated to bunch grass some years ago and has been maintained by spraying to control thistle intrusion since then as I recall. The description of the BC Controlled area does not appear to describe this condition. Also an assessment of how well this re-vegetation and active maintenance plan has worked is not described in the EA as near as I can tell. This would have a direct bearing on the feasibility of alternative number 2.
3. The characterization data for depth of contamination does not appear to be adequate in the EA.
4. A six-inch removal does not appear to be adequate as a basic assumption. In areas where the vegetative cover has failed, that much soil can be removed in a good windstorm (blowouts). Badgers can intrude much deeper than six inches and thistle roots can extend to in excess of ten feet. In other words the active transport mechanisms act deeper than the planned remedial action.
5. The EA does not apparently give details on how the scalped area will be backfilled and re-vegetated. The type of plantings and their maintenance is critical. In all likelihood the re-vegetated areas will require active maintenance for years to prevent the establishment of invasive species like thistle and cheat grass.

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In conclusion I think a much more cost effective approach would be to expand option two to include monitoring/ institutional controls and active maintenance of the existing bunch grass cover until the source trenches and cribs are disposed.

Thank you for considering these comments.

Yours truly,

A handwritten signature in black ink, appearing to read "M. Adams", is written over a solid black rectangular redaction box.

Melvin Adams (senior scientist, retired)