

0076821



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10 HANFORD/INL PROJECT OFFICE
309 Bradley Boulevard, Suite 115
Richland, Washington 99352

April 3, 2008

RECEIVED
APR 09 2008
EDMC

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

Re: EPA Comments on Site-Specific Field-Sampling Plans for the 216-B-42 Trench,
216-S-13 Crib, 216-S-21 Crib, 216-T-18 Crib and 216-T-19 Crib and Tile Field in the
200-TW-1/200-PW-5 Operable Unit

Dear Mr. McCormick:

Enclosed are U.S. Environmental Protection Agency's comments on Draft A of the
subject document.

If you have any questions, please contact me at (509) 376-5466.

Sincerely,

A handwritten signature in black ink, appearing to read "Laura C. Buelow".

Laura C. Buelow
Project Manager

Enclosure

cc: Doug Hildebrand, DOE
Ken Niles, ODOE
Gabe Bohnee, NPT
Stuart Harris, CTUIR
Russell Jim, YN
Admin. Record: 200-TW-1/PW-5

RECEIVED
APR 04 2008
EDMC

EPA Comments on Site-Specific Field-Sampling Plans for the 216-B-42 Trench, 216-S-13 Crib, 216-S-21 Crib, 216-T-18 Crib and 216-T-19 Crib and Tile Field in the 200-TW-1/200-PW-5 Operable Unit

Pages AD3 2-4, 3-4, 4-4, 5-3, 6-4: Please add cyanide and total uranium to the Analyte List on each of these columns. It was mentioned in the introduction, but I don't believe that it will get carried through if it is not on this list.

Page 2-3:

1. Please fix the figure in the first column; it is illegible.
2. Please make the numbers on the far right figure clearer; see above comment.
3. On the far right column, either take out comment # 4 or if this is problematic because of the figure, then add that well 299-E33-286 had a maximum of 50,000 pCi/g of Cs-137. As written, it implies that there is very little Cs-137 near this trench.

Page 3-6:

Please change #4 on the right hand column to read "The highest concentration of uranium-238 detected in well 299-W22-21 was 300 pCi/g at 206 ft bgs." As written, it sounds like you're comparing values at 206 ft bgs.

Page 4-1

The planned location for the analytical sample does not appear to be in a good location. The high Cs-137 levels will probably limit the amount of sample that can be analyzed. In addition, there does not appear to be concern about TRU waste, therefore at this time we do not need more information beyond the borehole logging at 25'. It would be more important to determine if there are mobile contaminants. I would suggest two analytical samples, one around 45' (where the moisture log peaks) and one deeper at another lithography change, and analyze for the contaminants listed for TW-1 and cyanide and total uranium.

Page 5-1

The third paragraph is not accurate anymore. Please update.

Page 5-5

Please add well summary table.

#4 on right hand column is vague. Is there a number for the highest contamination found? Or can you change the legend to CPM instead of pCi/g?

Page 5-8

The proposed activities section has not been updated.

Page 6-1

The last paragraph says that drillers encountered contamination at 35 bgs and abandoned drilling. Was it too much contamination to put in a monitoring well and not too high to do a borehole?

Page 6-6

The figure in the left hand column is unreadable, please fix.

In the Summarized well table, the max Cs-137 says 1 pCi/g, however the shading on the figure directly below shows somewhere between 100 and 1000 pCi/g. Please fix whichever is wrong.

Please add W14-51 and W14-65 to the Site Selection View.