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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

7601 W. Clearwater, Suite 102 • Kennewick, Washington 99336 • (509) 546-2990

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,

David Phillips for

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

JP:mf
Enclosure

cc: Darci Teel, Ecology
Tim Veneziano, WHC



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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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Addressee
P. S. Innis, EPA

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Subject: COMMENTS ON THE WHITE BLUFFS PICKLING ACID CRIB EXPEDITED RESPONSE
ACTION PROJECT PLAN

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