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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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

July 26, 1993

Mr. Walter Perro
Operable Unit Manager
U. S. Department of Energy-RL
P.O. Box 550
Richland, WA 99352

Dear Mr. Perro:

Re: North Slope Expedited Action Proposal

As per our discussions on the comment resolution meeting of North Slope Expedited Action Proposal on July 16, 1993, Ecology would like to have the final revised copy of the document as soon as possible. The document needs substantial revision and should be put in a readable format. Our general comments and a few new specific comments are enclosed here. The revised copy should incorporate all our comments. Recently, I also sent you by FAX, the information and comments received from Mr. F. R. Cook, Technical Analyst, Yakima Indian Nation. Please reply directly to Mr. Cook's comments.

We expect to evaluate progress on the comment resolution within first week of August, 1993. Please contact me to schedule a discussion of your final draft before August 7, 1993.

If you have any questions, please do not hesitate to call me at (509)736-3015.

Sincerely,

Dib Goswami, Unit Manager
Nuclear and Mixed Waste Management program

DG:mf
Enclosure

cc: Steve Wisness, DOE
Dennis Faulk, EPA
F. Gustafson, WHC
Administrative Record- North Slope ERA



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COMMENTS ON NORTH SLOPE EXPEDITED ACTION

GENERAL COMMENTS:

1. The document lacks detailed information on the ten landfills as mentioned in the text. Since the major cost is related only to these ten landfills more information is needed in the text. The text must identify these landfills and the approximate size to the extent possible.
2. Table 2-1 should define clearly and identify separately the military vs. nonmilitary sites, various Nike missile sites, landfills, anti-aircraft gun sites, cisterns, wells, and other waste units.
3. Details on the eight water wells is completely missing from the text. A separate table giving all details (such as depth of wells, size, casing depth, etc.) and cost estimates must be provided in the document. Information not available on any specific units must be clearly stated. Other cost effective measure(s), other than following WAC if present, must be investigated.
4. More clarification on the cost estimates and on assumptions must be provided. This is specially applicable for the landfills and well abandonment. The tables need to be modified/created as per our discussions on July 16, 1993.
5. Results obtained (if available) from the limited investigation on each waste units must be stated in the description of each unit.
6. Text must also highlight the problem of asbestos in the area.
7. Specific comments as discussed in the meeting must be incorporated in the text.

Specific Comments:

1. Page 23, Section 2.2.5 2, 4-D Disposal Site: Additional information should be provided in this section to clarify the status of the tanks. If there is a possibility of residual herbicide remaining within any portion of the flattened (but mostly integral?) tanks, then the ERA proposal needs to justify why the tanks are to be left in place.
2. Page 29, Section 5.0 Response Action Alternatives: A reference should be provided for the U.S. Fish and Wildlife Service's ranking of proposed refuge projects. Moreover, it should be clarified whether the proposed refuge has the same boundaries as the entire North Slope area, or whether it is only a portion of it. This clarification would be helpful because only a portion of the North Slope is currently managed by USFWS as a refuge.

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3. Pages 30 and 31, Section 5.2 Hazard Mitigation:

3rd paragraph: "Local source" of fill is too vague. Fill material should be from an already approved fill source or from an already otherwise disturbed site. The ERA should ensure that relatively undisturbed habitat areas are not exploited as sources of fill. Also, revegetation efforts should include native shrubs if these are naturally part of the site's floral components and the disturbed area is extensive.

4th paragraph: A number of birds of prey (raptors) nest in the trees associated with the military sites. Cleanup activities at these sites need to be timed appropriately so that the nesting cycle of these birds is not disrupted. Moreover, nest trees are at a premium on the North Slope. Thus, the trees themselves should be protected from harm due to cleanup activities.

5th paragraph: Who will perform the semi-annual survey? Can the ERA commit any future site landlord to these surveys?

10th paragraph: This paragraph is narrowly written in regard to its focus on only threatened and endangered species. All wildlife species, and especially those identified by the Washington Department of Wildlife as a Priority Species, should be considered when attempting to minimize the impact to wildlife by cleanup activities.

4. Pages 31 and 32, Section 5.3 Waste Removal: The same comments, in regard to fill source, raptor disturbance, and Priority Species, discussed for Section 5.2 above apply here as well.