



Oregon

John A. Kitzhaber, M.D., Governor

Department of Consumer and Business Services

Office of Energy
625 Marion St. NE, Suite 1
Salem, OR 97301-3742
Phone: (503) 378-4040
Toll Free: 1-800-221-8035
FAX: (503) 373-7806

Web site: www.cbs.state.or.us/external/ooe/

November 25, 1998

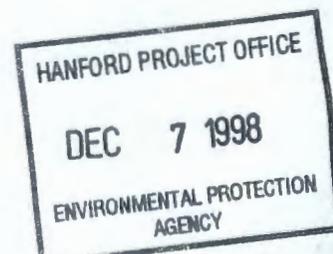
Mr. Dennis Faulk
U.S. Environmental Protection Agency
712 Swift Boulevard, Suite 5
Richland, WA 99352

Re: Oregon Office of Energy's Comments on the Proposed Plan for Interim Remedial Actions at the 100 Area Remaining Sites.

Dear *Dennis* Mr. Faulk,

Thank you for the opportunity to comment on the Proposed Plan for Interim Remedial Actions at the 100 Area Remaining Sites. Overall, we support the preferred action of Remove/Treat/Dispose and the Plug-In Approach described in this document, but have several concerns. These concerns are listed below.

1. There should be a formal process for evaluating a site's suitability for the Plug-In Approach. This process should include evaluation criteria and evaluation methodologies and provisions for public review and comment on the final decision as a minimum.
2. Page 4, left column, 3rd paragraph, last sentence contains a typographical error. There is an extra period following the word "actions."
3. It appears there may be a typographical error in the Human Health Risk section. Page 5, the third paragraph states that remediation goals represent a hazard index of 1. This should be <1.
4. More detail should be provided about the effects of the Remove/Treat/Dispose fill material on the movement of contaminants remaining below the excavation level. Will this fill material significantly increase the rate at which recharge water, or other fluids, move through the vadose zone and therefore increase the rate of movement of contaminants?
5. The Preferred Interim Remedial Alternatives section discusses storing waste if it is impractical to treat it to meet ERDF acceptance criteria. Include in this discussion the options being considered for this storage.

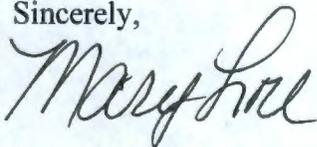


November 25, 1998

Mr. Dennis Faulk
Page (2)

Should you have any questions, please contact Doug Huston at (503)378-4456.

Sincerely,

A handwritten signature in cursive script, appearing to read "Mary Lou Blazek".

Mary Lou Blazek
Administrator
Nuclear Safety Division
Oregon Office of Energy