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United States
Environmental Protection
Agency

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9203143

0021857



July 1, 1992

Eric D. Goller
U.S. Department of Energy
P.O. Box 550, MS A5-19
Richland, Washington 99352

Re: Comments on the 100-FR-3 Description of Work

Dear Mr. Goller:

The U.S. Environmental Protection Agency (EPA) and the Washington State Department of Ecology (Ecology) have reviewed the Description of Work for the 100-FR-3 Operable Unit. This letter transmits the combined comments from the regulatory agencies.

In order to facilitate expedited resolution of these comments it would be of the best interest of all parties to have a meeting at the earliest convenience.

Should you have any questions or concerns regarding these comments, please contact me at 376-4919.

Sincerely,

Pamela S. Innis
Operable Unit Manager

Enclosure

cc: Darci Teel - Ecology, Kennewick
~~W. Veneziano~~ - WHC
Administrative Record, 100-FR-3

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100-FR-3 Description of Work
Review Comments

General Comments

The substitution of the existing well (F7-2) for the proposed well (F4-1) is acceptable. Are there any existing chemical/radiological data for this well? Also, if field work will begin before the final work plan is approved and distributed then the description of work should note the change in the number of well installations and the substitution for F7-2 for F4-1.

Specific Comments

1. **Figure 1, p 2**
Well number F5-46 (F3-11 in the work plan) has been moved substantially to the southeast compared to the locations agreed to on August 15, 1991 and noted in draft B of the work plan. Justification for this change is necessary.
- Several wells that are included in the work plan (Figure 5-1) are not included on this figure. Include wells F5-2, F5-5, and F5-7 in Figure 1.
- The symbols for the individual well locations are not legible.
- Table 1, p 5**
The estimated depth and the estimated screened interval given in the table do not coincide. Adjustments to the values in the table should be made to rectify this problem.
- Section 3.3, p 4**
The rationale for selecting the specified locations for physical samples is unclear and should be discussed.
- The sampling as stated is limited to the unsaturated zone and the unconfined aquifer. The proposed well is intended to also penetrate the uppermost confining unit and be completed in the uppermost confined aquifer. If contamination is found in the uppermost confined aquifer, then information on the properties of the confined unit will be needed (primarily saturated hydraulic conductivity). It may be worthwhile to collect and analyze a sample from the confining bed.
- In reference to the preceding paragraph, if contamination is found in the uppermost confined aquifer and no physical sample is retrieved it may be necessary to collect a sample from the confining layer in an alternate well.
4. **Section 3.4, pp 5 & 6**
The party that is responsible for the collection and shipment of samples should be noted in the text.

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5. **Section 3.4.3, pp 6 & 7**
The lists of radionuclides given in Table 2 and Table 3 the DOW is significantly shorter than the list of radionuclides in the primary list of contaminants of interest (Table 3-26) given in the work plan. Specifically, Calcium-14, Nickel-63, Iodine-129, and Cesium-137 have half-lives that do not preclude them from analysis. An explanation for this is necessary.
6. **Section 3.6, p 8**
This section should be consistent with Section 5.1.1.6.2, Activity 6b-5 of the 100-FR-3 Work Plan. The work plan states that if the slug test proves to be of limited value, other tests may be performed.
7. **Section 6.0, p 9**
The text notes that copies of the project change form will be submitted to the lead regulatory agency. As noted in the TPA, minor field changes do not require regulatory approval, however changes that effect the work schedule or the scope of work require approval. The text should note this requirement.

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Author: P. S. Innis, EPA Addressee: E. D. Goller, RL Correspondence No.: Incoming 9203143

Subject: COMMENTS ON THE 100-FR-3 DESCRIPTION OF WORK

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