California Regional Water Quality Control Board – Central Valley Region Responses to letter from Susan Timm dated November 30, 2007		
No.	Comments	Response to Comments
General Comments		
1	For each DOE area which analyzes Alternative 2 based on the nine criteria, DOE discusses short term effectiveness. In the discussion DOE states "…if monitoring results trigger contingent remedial action this alternative is expected to be protective within five years." In order to comply with State Water Resources Control Board Resolution 92-49, DOE needs to state in the FS that if remedial action(s) are implemented, the remedial action would be considered protective when groundwater is cleaned up to background concentrations. If DOE can show that background concentrations are not technically or economically feasible, then DOE will need to cleanup to water quality objectives protective to the one-in-a-million cancer risk or the lowest water quality objective applicable for the constituents of concern (COCs).	Agree, the following was added to the discussion of short term effectiveness for ground water monitoring alternative evaluations: "Contingent remedial action will be considered protective when groundwater is cleaned up to background concentrations, or if background concentrations are not technically or economically feasible, water quality objectives protective to one-in-a-million cancer risk or the lowest water quality objective applicable for the constituent/s of concern." Added to Sections 4.4.3.2.5, 4.6.3.2.5, 4.7.3.2.5, 4.11.3.2.5, 4.12.3.2.5, 4.12.3.3.5.
Specific Comments		
2	**Page 3-2, Section 3.3.1. No Action**. DOE discusses the No Action alternative as a potential Response Action. DOE states that in areas where removal actions have been conducted, the "No Action" alternative may be referred to as "No Further Action". For the areas that have had removal actions there should be a discussion of what the removal action accomplished, including a summary of the constituents of concern (COCs) remediated and the confirmation sampling results. For example, on page 4-77, Domestic Septic System No. 6, DOE has only one alternative, the No Action alternative. DOE states that under this alternative, no further action will be performed. DOE needs to summarize why a removal action was performed at DSS-6, what COCs were remediated and the results of confirmation sampling. This discussion is necessary for all areas where a removal action was performed and the No Action alternative is chosen as the preferred alternative.	Agree. Removal actions were completed in the Domestic Septic System 6 Area, Western Dog Pens Area, and DOE Box Area. Summaries were written explaining why the removal actions were performed, what the removal actions accomplished, the constituents of concern (COCs) remediated and the confirmation sampling results. The summaries were added to sections 4.9.1, 4.13.1 and 4.15.1 for the Domestic Septic System 6 Area, Western Dog Pens Area, and DOE Box Area, respectively.

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3	**Page 3-3, Section 3.3.2.2. Ground Water Monitoring**. In our 2 February 2007 comment letter on the draft FS, we stated "DOE needs to acknowledge that monitoring may show that remediation will need to continue longer than predicted or additional remediation will be necessary, but not express these possible results as limitations." DOE removed the bullets stating these two concepts are limitations but did not include a discussion of the two possibilities in the text. The discussions of groundwater monitoring as a general response action need to acknowledge that this general response action includes the commitment from DOE that groundwater remedial alternatives will be evaluated if groundwater monitoring shows that groundwater has been impacted above background levels for any of the COCs.	Agree, the following text was added to the end of the first paragraph of Section 3.3.2.2: "Groundwater monitoring as a general response action includes the evaluation of groundwater remedial alternatives if groundwater monitoring shows that groundwater has been impacted for any of the COCs." The following text was added before the last sentence of the third paragraph of Section 3.3.2.2: "The results of monitoring could show that remedial action will need to continue longer than anticipated from treatment technology performance predictions. Monitoring may also trigger DOE's evaluation of additional ground water remedial alternatives."
4	**Figure 3-2**. The first General Response Action is called "No Further Action" and the Remedial Technology is called "No Further Action". To be clear, the General Response Action should be "No Action" and the Remedial Technology should have two boxes, one labeled "No Action" and one labeled "No Further Action". The second General Response Action is "Institutional Controls" and the Remedial Technologies for this General Response Action are "Land Use Controls" and "Monitoring". The "Monitoring" remedial technology should be labeled "Groundwater Monitoring". Since DOE is proposing Alternative 2 as groundwater monitoring with contingent remedial action, DOE needs to include a discussion of contingent remedial action as part of the Groundwater Monitoring Remedial Technology with respect to effectiveness, implementability and cost.	Agree: Figure 3-2 was updated to show "No Action" as a General Response Action with boxes labeled "No Action" and "No Further Action" under Remedial Technology. Figure 3-2 was updated to show "Groundwater Monitoring" as a remedial technology. The following text was added to Figure 3-2 for "Ground Water Monitoring": Effectiveness – "Contingent remedial action will be necessary if ground water monitoring shows ground water impacts." Implementability – "The difficulty of contingent remedial action varies with the selected technology." Cost – "Potential high capital and/or O&M costs if contingent remedial action becomes necessary."

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5	**Page 4-3, Section 4.2.1**. Overview of the National Contingency Plan Evaluation Criteria. Under Balancing Criteria, DOE states that Short-Term Effectiveness evaluates the time required to reach a protective state. DOE needs to state that groundwater remedial actions would be considered protective when background is achieved for all COCs, or, if DOE can show that background is technically or economically infeasible to achieve, when the lowest applicable water quality objectives are achieved.	Agree, the following was added to the end of the Short Term Effectiveness bullet under Balancing Criteria in Section 4.2.1: "Groundwater remedial actions will be considered protective when background is achieved for all COCs, or, if background is shown to be technically or economically infeasible to achieve, when the lowest applicable water quality objectives are achieved."
6	**Page 4-5. Section 4.3.2. Long-Term Monitoring**. In this section, DOE needs to state that remedial alternatives for groundwater will be evaluated and the preferred alternative implemented if groundwater monitoring shows that groundwater has been impacted above background levels for the COCs. Also, this section should be called "Long-Term Groundwater Monitoring".	Agree, the following assumption was added to Section 4.3.2: "Remedial alternatives for groundwater will be evaluated and the preferred alternative implemented if four consecutive ground water sample results from a designated DOE area ground water monitoring well exceed site background and show an increasing or constant concentration trend."
Editorial Comment		
7	In the FS, DOE refers to the Dry Wells A through E as "Domestic Septic System Nos. 1 through 5 Leach Field (Dry Wells A through E)". DOE needs to change all the references to the Dry Wells A through E to "Domestic Septic System Nos. 1 and 5 Leach Field (Dry Wells A through E)". Domestic Septic Systems 2, 3 and 4 are not connected to the Dry Wells A through E.	Agree, the editorial correction was implemented. Applies to Section 4.11 heading.