

OU 2 IM/IRA - RESPONSIVENESS SUMMARY
Submitted December 1990

EPA Comments

Executive Summary - This section should present the proposal to establish a second IM/IRA for the Woman Creek seeps, and explain briefly what changes this will require in the plan as released for comment. A similar discussion should be provided on addition of the SW21 flows to the Walnut Creek system, including an explanation of why this seep was not previously identified and why it is now believed to warrant collection and treatment.

Comments/Responses #8 & 15 - The response offered will not significantly allay the concern expressed, since the documents cited are either not available currently (PPCD) or not subject to public comment (SSHSP). In addition, no mention is made of using temporary enclosures to control dust emissions, the one method the public commentators seem to favor most. DOE should strengthen their position on addressing the dust control issue by committing to use all appropriate measures to adequately limit risks. This could well include temporary structures, which have been found effective and appropriate for some types of remedial actions.

Comment/Response #17 - If you assume, as one commentator asserts, that defense contractors have unlimited funds, the resource based argument for not providing post-treatment storage is invalid. The presence of downstream safeguards and the fact that even a complete treatment system failure would only return the drainage to its pre-action conditions offer a better basis for response.

Comment/Response #18 - Handling and/or storage of residuals onsite appears to present a major concern, in this comment and elsewhere. The answer that ultimate disposal capacity will be available when needed does not speak to this concern. Handling/storage onsite will be required, even if only short-term. The procedures for this should be presented or reference made to pertinent documents, such as the SOPs.

Comment/Response #23 et.al. - Entries dealing with the exclusion of the Woman Creek seeps from the proposed action must be revised to show that these seeps will be addressed under a separate IM/IRA and justify this decision.

Comment/Response #30 - The commentator appears to be requesting the PPCD, which he assumes will address the use of portable shelters. The PPCD is not mentioned in the response, and the document itself does not address the implied issue.

Comment/Response #43 - For the benefit of this commentator, and anyone else who may misunderstand ALARA, it should be explained that the attempt to combine this with ARARS is to mix two

incompatible approaches to achieving protectiveness. It should be clearly understood that the concept of ALARA as applied to industrial environments is not germane to establishing appropriate target concentration levels for an environmental restoration effort.

Comment/Response #57 - Training of EG&G and contractor personnel is something the DOE made much of during IAG negotiations, and the schedules negotiated allow large blocks of time for these activities. It is not only compliance with the safety plan that is at issue here, it is the quality, consistency, and safety of contractor activities onsite. The SOPs and the associated training programs are the primary vehicle for ensuring this, and they should be described here.

Comment/Response #59 - The response referenced here does not address the real issue, access to draft documents by outside parties. A description of ongoing discussions and the process DOE intends to use for resolving this question should be presented.

Comment/Response #121 & 122 - The OU 2 IM/IRA aims to protect human health and the environment, not serve parochial objectives. It might be prudent to remind the commentor that detention capacity, diversions, and an interbasin transfer are already in place, and zero-discharge options are being studied. Thus the "potential for contamination of the water supply" has been and will continue to be significantly reduced, beyond the point where the "sump failure" scenario presents a real threat.