

**EPA Comments on the Draft Phase I RFI/RI Workplan
for OU 15, the Inside Building Closure Units**

General Comments

Overall, this workplan was found to be adequate and appropriate to characterize OU 15. However, there are some issues and concerns regarding the Field Sampling Plan (FSP) and Human Health Risk Assessment (HHRA) which need to be taken into account when preparing the Final version of the workplan. These are explained below.

The purpose of the FSP is to fully characterize the nature and extent of contamination of each IHSS and to determine and characterize any contaminant pathways and releases from each IHSS. The proposed sampling activities included in this workplan appear to be sufficient to characterize the extent and nature of contamination within each IHSS. However, it is not clear how DOE is planning to determine the existence of possible previous releases and to characterize contamination migration from the IHSSs. EPA recommends DOE first complete the proposed screening activities such as taking a closer look at the historical information, conducting thorough visual inspections, taking wipe samples and performing the radiological surveys. If after completion of these activities there are no indications that releases have occurred or that contaminants could have migrated outside the IHSSs, then it is reasonable to conclude that no subsequent sampling activities are needed external to the IHSSs. In the case that the information gathered shows that a release has occurred and that contaminants could have migrated outside the IHSSs, then DOE must propose further action to the regulatory agencies for consideration and discussion. This can be presented as a Technical Memorandum.

In addition, EPA is concerned that the HPGe detector may not be practicable or appropriate for radiological surveys at these IHSSs which are small areas inside the buildings. DOE needs to explain and include information on the calibration, operation procedures, and type and useability of the data given by the HPGe detector. If it is determined that the HPGe will not provide reliable information or that is not practicable for these IHSSs, then DOE needs to propose other options.

EPA agrees that the Baseline Risk Assessment should only consider performing a HHRA and that the Environmental Evaluation (EE) portion should be excluded. However, it is EPA's position that the HHRA should be performed only if it is determined that there is a source of contamination or if past releases have occurred, and if potential pathways to receptors are identified. In this case, an industrial use scenario should be considered rather than residential scenario due to the fact that we are dealing with contamination inside buildings.