6347

CORRES. CONTROL
INCOMING LTR NO.

4113 RF 91

States Government

Department of Energy
Rocky Flats Office

Memorandum

OCT 14 2 03 PM '91

EG&G
ROCKY FLATS PLANT
CORRESPONDENCE CONTROL

DUE DATE

ACTION

DIST.	LTR	ENC
BENJAMIN, A.		
BRETZKE, J.C.		
BURLINGAME, A.H.		
COPP, R.D.		
CROUCHER, D.W.		
DAVIS, J.G.		
EVERED, J.E.	X	X
FERRERA, D.W.		
FERRIS, L.R.		
FRAIKOR, F.J.		
FRANCIS, G.E.		
GOODWIN, R.		
HANNI, B.J.		
HEALY, T.J.		
DEKER, E.H.		
HENS, J. P.		
HERSH, J.M.	X	X
KIRBY, W.A.		
KRIEG, D.		
LUESTER, A.W.		
LEE, E.M.		
MAJESTIC, J.R.		
MARX, G.E.		
MATHEWS, T.A.		
MEURRENS, B.E.		
MORGAN, R.V.		
PIZZUTO, V.M.		
POTTER, G.L.		
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WIEBE, J.S.		
WILKINSON, R.B.		
WILSON, J.M.		
YOUNG, E.R.		
ZANE, J.O.		
Nesta	X	X
Frick L	X	X
CORRES CONTROL	x	x
TRAFFIC		

Reviewed for Addressee
Corres. Control RFP
10-14-91

DATE BY

Ref Ltr. #

OCT 10 1991

ERD:PMP:8711

Comments on Draft Environmental Assessment for Remediation of Jefferson County Open Space Land Operable Unit 3

J. E. Evered, Director
Environmental Restoration
EG&G Rocky Flats, Inc.

Attached are comments relating to the subject environmental assessment (Attachment 1) and comments relating to preparation and contents of environmental assessments in general at Rocky Flats Plant (Attachment 2). Please contact Tricia Powell, x3260, if we need to discuss responses to the comments, and provide Tricia with a final version of the environmental assessment on diskette.

Richard J. Schassberger

for Frazer R. Lockhart
Director
Environmental Restoration Division

Attachments (2)

cc w/o Attachments:
S. Nesta, EG&G/RF

DOCUMENT CLASSIFICATION
REVIEW WAIVER PER
CLASSIFICATION OFFICE

RF-46522 (Rev. 6/91)

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Specific comments on the Draft Environmental Assessment for Remediation of Jefferson County Open Space Land Operable Unit Number 3

Title

1. Change the title to something more descriptive of the proposal. Keep it short. How about "Herbicide Weed Control in OU3"?

Section 1.0

para. 1 Remove the reference to the interim procedural guidance. Leave SEN-15.

para. 2 Need more explanation about how we can be proposing to use herbicides in OU 3 if there is a plant wide ban on the use of herbicides that includes OU 3.

Section 2.0

para. 2 Last sentence should end after "(IAG)". The remedy acreage is not recognized as separate from OU3 in the IAG, and no provisions are made for complying with the Settlement Agreement in the IAG.

Section 2.1

para. 1 Replace "Solid Waste Management Unit No. 199" with "The Remedy Acreage".

Replace "(CDH) guidelines" with "(CDH) special construction standards".

Insert "surface" between "strips to reduce" and "Plutonium concentrations"

Need to add an explanation of how the Settlement Agreement requires DOE to plow and revegetate only if requested to by the land owners.

Include a Settlement Agreement deadline for the work to be completed (if there was one) or state that the revegetation was to continue until successful (if there wasn't one).

Figure 1 Figure needs a title, a legend and enough labeled landmarks to tie it to the plant and the rest of the world in time and space. Change "SWMU 199" to "Remedy Acreage".

Section 2.2

para. 1 Change "unsuccessful revegetation" to "partially successful revegetation".

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para. 2 There is no mention here of cattle grazing as a reason for lack of revegetation, or inclusion of fencing in the proposed revegetation activities listed here, but the Proposed Action includes fencing to control cattle. Cattle have not grazed the acreage since the year after the Settlement Agreement was finalized.

para. 3 Replace "at SWMU No. 199" with "of the Remedy Acreage".

Section 3.0

para. 2 Change the first sentence to "The project is needed to comply with the 1985 Settlement Agreement by re-establishing vegetation."

Reword the paragraph to clarify that state legislation is requiring DOE to control noxious weeds.

Section 4.0

para. 1 Explain the sequencing of applying herbicide and planting native seeds. Surely we intend to apply herbicide first to kill weeds and then plant seeds to replace the weeds.

Section 4.1

bullet 4 Discing mulch into the ground seems illogical if the ground is too hard and rocky to drill seed.

bullet 5 See comment about cattle grazing under Section 2.2, para. 2.

Section 4.3

para. 1 Clarify how we expect to be successful in revegetation with broad leafed forbs while at the same time applying herbicides to control broad leafed weeds in the fall and spring. Perhaps the first application of herbicide will be with a tractor followed by selective applications with a hand sprayer to avoid killing beneficial plants.

Name the herbicide or herbicides being considered.

Third sentence from the end - change "is considered a SWMU and is part of the IAG" to "is part of OU 3 which is addressed in the IAG".

Affected Environment section

Where is it? It should include a description of the CDH/WQCD water quality standards that apply to this project and Walnut and Woman Creek. It will be exceedingly difficult to not violate the standards with herbicide spraying.

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Section 5.1

para. 1 No action here would really be not using herbicides. Other measures for restoring vegetation would still be acceptable and even mandated by the settlement agreement, so no action would not mean letting the weeds take over. Perhaps Section 5.2.3 is really the No Action alternative, with some modifications.

Section 5.2.1

para. 1 This is the first time I have heard of hydromulch needing to be irrigated to prevent seed desiccation. Usually hydromulch is applied to slopes too steep to be seeded and mulched using any other method, and irrigation is not applied to steep slopes. Certainly if crimped hay mulch in the Proposed Action will provide sufficient seed moisture without irrigation, hydromulch would, too. Need to check the facts as stated here.

Section 5.2.2

para. 1 Seedbed preparation steps seem to need to be renumbered.

Explain what the "maximum environmental impacts on the soil" would be rather than use this generalization.

Wouldn't another disadvantage to this alternative be that sorghum is an annual crop that would have to be replanted every spring?

Section 5.2.3

para. 1 This section seems to describe most closely what should be in the No Action alternative.

I question the use of grazing as a weed control method we should consider. Livestock (except maybe goats) will eat the grasses, forbs and shrubs we are trying to establish before they will touch the plants we are trying to eradicate, so to use cows or horses to control weeds is a contradiction in terms.

Section 6.0

throughout Include the impacts of all the viable alternatives in this section, and No Action even if it is not viable.

Do not include topics for which no impacts will result.

Section 6.1

para. 1 Move the section of the paragraph that begins "Fugitive dust will be kept to a minimum" and ends with "serve to identify appropriate monitoring/control needs." to the description of the Proposed Action. This is not a description of impacts.

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Section 6.2

para. 1 To "No impacts to water quality due to wind drift from spraying of herbicieds are expected" add "because.....".

last sentence - Information about improving soil conditions should be listed under soils impacts instead of here.

para. 2 Change "Remediation Land" to "OU 3".

Is there really a water quality monitoring program for OU 3 now? One is planned in the OU 3 work plan. Investigate the possibility of starting a monitoring program for the duration of herbicide use.

How long will quarterly sampling for targeted analytes continue?

Section 6.6

para.1 This description has nothing to do with land use. Maybe wildlife and human health impacts.

Section 6.7

para. 1 All but the last sentence of this paragraph belongs in the Affected Environment section.

Section 6.8

para.1 This is the first mention of "scraping operations"in conjunction with herbicide use. What are they? They should be described in the Proposed Action if they are to be included here.

What herbicides will we be using?

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General comments on the preparation of environmental assessments:

1. The document should be written as if the execution of the proposed action is not a *foregone conclusion*. This means the document describes actions or impacts that would occur as opposed to actions or impacts that will occur.

2. All aspects of the proposed action and alternatives should be described in the proposed action and alternatives section. Facets of the proposed action or the alternatives that have not been introduced previously in the document should not show up in the description of the affected environment or the impacts.

3. The No Action alternative analyzes what happens if the present management continues. It would include any activities that are currently authorized or required to occur.

4. A summary of the impacts for No Action (and any other alternative being carried forward) should be included under each heading listed in the Impacts section. As a general rule, the analysis of the No Action alternative must be carried forward through the document, even if continuing the present management is not an acceptable course of action. No Action provides the baseline level of impact against which the proposed action and alternatives are compared. Without a description of the impacts under No Action, Management will not know the magnitude of changes in impacts under the proposal.

5. Leave out headings in the Impacts section if no impacts are expected to occur under the proposed action or the alternatives. Do not list a heading only to state that no impacts, negative or positive, are expected to occur.

6. Avoid usage of the terms significant and insignificant within the EA. These are conclusions reserved for the FONSI.