

### General Comments

- 1) A plate showing the changed IHSS locations and their original IAG locations would be very helpful in determining which location is the most accurate
- 2) DOE must evaluate all information in order to present a plate showing the estimated location of all PICs All PICs must be associated with an estimated location
- 3) Those documents that were seized by the FBI should be reviewed and any additional information found to have a bearing on this report should be incorporated
- 4) The criteria used to determine whether a release is included within this report cannot be limited to releases involving hazardous substances listed in Table 2-1 The document must include all releases, including releases of hazardous substances not listed in Table 2-1

### Specific Comments

- 1) Page 800-5, PAC 800-102, Description of location A good rationale for moving this PAC to the location shown on Figure 800-1 is not cited in the report The location shown in the Phase III RI/FS Work Plan coincides with what appears to be a bermed area or pit in the 1955 aerial photograph Unless other documentation exists, PAC 800-102 should not be moved to the location on Figure 800-1
- 2) Page 800-10, PAC 800-106, Description of constituents released No mention was made of the water samples taken in 1987 from the retention pond just below the outfall These samples contained elevated levels of plutonium and americium, (DOE RI Report for High Priority Sites, July, 1987)
- 3) Page 800-12, PAC 800-107, Description of constituents released No mention was made of water samples taken from the skimming pond just below this outfall (footing drain from Bldg 881) Elevated levels of PCE and TCE were detected in these samples This and other data suggest that the footing drain may act as a collection zone and conduit for contaminated ground water in this vicinity
- 4) Page 900-19 to 21, PACs 900-119 1 & 119 2, Unit Names and Descriptions Although several documents (CEARP, Phase I, DOE RI Report for High Priority Sites, and Phase III RI/FS Work Plan) state that these two areas were used for solvent storage, this report states that no documentation was found which supports

**ADMIN RECORD**

A-SW-000347

solvent storage activity EPA's Aerial Photographic Analysis Comparison Report, 1988, noted the existence of drums in the 119 1 area in 1969, staining in 119 1 in 1971, and leakage in the 119 2 area in 1969. The HRR seems to rely heavily on interviews with two former RFP employees who disputed that the area was used for solvent storage. In addition, this report does not mention groundwater samples from the 119 1 location in which TCE was detected at levels as high as 12900 micrograms/liter. The dates of operation are listed in the HRR as 9/68 - 11/71, but other documents have the dates as 1967-1972. In general, it seems that much important information was not included in the description of these PACs, and it is misleading to rename the sites Scrap Metal Storage Areas.