



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706-1255 • (208) 373-0502

March 29, 2002

Dirk Kempthorne, Governor
C. Stephen Allred, Director

Ms. Kathleen Hain, Manager
Environmental Restoration Program
U.S. Department of Energy
Idaho Operations Office
850 Energy Drive
Idaho Falls, Idaho 83401-1563

RE: IDEQ Technical Review Comments for the Construction Complete Report for the
Central Facilities Area, Operable Unit 4-13, Transformer Yard (CFA-10) Draft

Dear Ms. Hain:

The Idaho Department of Environmental Quality (IDEQ) has completed its review of the
above-referenced document, which was received February 25, 2002. The comments
were sent electronically on March 27, 2002 and also are attached.

If you have any questions, please contact me at (208) 373-0556.

Sincerely,

A handwritten signature in cursive script that reads "Clyde Cody".

Clyde Cody
INEEL WAG Manager
IDEQ Technical Services Group

CC/jc

cc: Carol Hathaway, DOE-ID
Kathy Ivy, USEPA
Daryl Koch, IDEQ-WMRD

Attachment

1) Section 2.3.2, Page 10, Fourth Paragraph

The discussion of the soil evaluation activities, and soils removed, should include a reference to the amount (in cubic yards) of soil from each sector that demonstrated TCLP lead > 5mg/L, and was removed to a TSD facility. Conversely, include the soil volumes for each sector that passed the TCLP, was non-hazardous and was hauled to the CFA Landfill. A suggestion would be to reference Table 3, and modify the table to include more specificity.

In the fourth paragraph, the discussion appears to indicate that the lifts removed were demonstrated to have passed the TCLP and were, therefore, nonhazardous. However, it is not clear based on this discussion or Appendix C if the sampling conducted also indicated total lead levels greater than 400 mg/kg, thus justifying disposal at CFA.

2) Section 4, Page 14, Fourth Bullet

Please indicate where the results can be found that demonstrate total lead levels greater than 400 mg/kg for the Sector 5 and Sector 1 soils excavated and temporarily stored in the soft-sided bags. The discussion appears to indicate that both lifts were ultimately disposed of, but the justification based on the "Remediation" sampling results in Appendix C (Table C-2) is not readily apparent.