



# INEL

COMMUNITY RELATIONS  
COORDINATOR


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 Subject: Comment on the Proposed Plan for WAG 3

Eric, here is my comment. If you need anything else please let me know.  
 Thanks.

In the ecological risk assessment section. The ecological risk assessment method and results are misrepresented and this section needs to be clarified. For example, the first step of the ERA process is a background and EBSL screening, however an additional (much less conservative) assessment is then performed on those sites that are not eliminated by this screen. This information needs to be included or the paragraph rewritten, since currently it gives the impression that the preliminary screen is the only step performed. More importantly is the inclusion of an appropriate discussion concerning the additional site and contaminate elimination step requested by the DOE-ID, EPA, and IDHW. Based on the results of the ERA, those sites that had HQs greater than 1.0 (27 sites) were eliminated as a concern by the risk managers if the soil concentrations (at the 95%UCL or max [which ever was lower]) was less than 10X background or if the HQ was less than 10. This eliminated all but 16 sites of the 27 sites (as well as multiple contaminants). Of these 16 sites, 4 were solely an ecological risk. This needs to be more clearly stated in the text since it gives the impression that of the 27 sites, 4 were solely an ecological risk and this is not the case. The statement that the remaining 64 sites do not pose risk to ecological receptors should be rewritten to state that the remaining 64 sites were eliminated as a concern to ecological receptors by the risk assessment process. Due to

the uncertainty in the risk assessment process (also true of human health)  
it is not responsible to state that "no risk" (implying zero risk) is posed.