



United States Department of the Interior

GEOLOGICAL SURVEY
Water Resources Division
Idaho National Engineering Laboratory
CF 690, P.O. Box 2230,
Idaho Falls, Idaho 33403-2230

August 27, 1987

Kenneth D. Feigner
U.S. Environmental Protection Agency
Region X
1200 Sixth Avenue
Seattle, Washington 98101

Subject: REPORT: USGS comments on: "Closure plan for CPP-63 Hexone spill
by CPP-710"

Dear Mr. Feigner:

Transmitted herewith are our comments for the subject report prepared by WINCO dated July 1987. Comments are keyed to the report by section and paragraph number unless otherwise noted.

If there are questions, please contact me at your convenience.

With best regards,


Larry J. Mann

cc: ~~F. H. Weiler, DOE-ID (w/attachments)~~

Cheryl Koshuta, Idaho Dept. of Health and Welfare, Boise (w/attachments)
District Chief, USGS, ID-NV (w/o attachments)

USGS review comments for "Closure plan for CPP-63 Hexone spill by CPP-710"

Cover page The title does not jibe with those on next three sheets and page 1.

Section 1.1:

Par. 1 When was the transfer line damaged? Was the line leaking 2 days or 2 years? It would help to know time span of leak.

Section 2.1

Par. 1 "Disposed of" as used here implies that the hexone was intentionally lost or gotten rid of. Perhaps another choice of words would be appropriate.

Section 2.2

Par. 1 There is no way to evaluate sentence 1 because the length of time pipe leaked and the rate at which it leaked is not specified.

Section 7.1

Par. 1 Well 50 taps a perched-water zone. The implication in this paragraph is that the regional aquifer will be sampled.

Because of the unknown volume of Hexone lost, "a subjective probability cannot be assigned to the potential for migration. If a considerable volume of Hexone were lost owing to the leaky pipe, gravity and capillarity may be the only transport mechanisms needed to transport the Hexone to a perched zone; water in the perched zone would provide a transport mechanism to the aquifer.