United States Department of the Interior

GEOLOGICAL SURVEY

Water Resources Division
Idaho National Engineering Laboratory
CF 690, P.O. Box 2230,
Idaho Falls, Idaho 83403-2230

May 27, 1987

Mr. Wayne Pierre
U.S. Environmental Protection Agency
Region X
1200 Sixth Avenue
Seattle, Washington 98101

Subject: REPORT: USGS comments on: "Closure plan, ICPP Injection Well".

Dear Mr. Pierre:

Transmitted herewith are our comments for the subject report prepared by WINCO dated March 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: C.E. Clark, DOE-ID
District Chief, USGS, ID-NV

USGS review comments for "Closure plan, ICPP Injection Well"

Section 1.1:

Par. 2 The perforations may be 2 inches in diameter according to the TV log and a piece of polyethylene we have which was cut from the liner.

Section 1.3:

Bullets 2, 3 and 4 are not closure goals, but are procedures that are needed to ensure that nothing else goes down the well in the event of an emergency release. Presumably, the well is or will be permitted by the State of Idaho as a disposal well for emergency releases.

Section 2.1:

Par. 4 Part of the 8 wells currently are not downgradient from the injection well, but are along an equipotential line; when injection took place, however, all were downgradient.

According to our files, no mercury samples were collected at wells 41 to 49, 51, 52, 58, 59 prior to 1983. Mercury may not have been detected because there were no samples collected. In October 1984, however, samples obtained from these wells generally contained <0.1 μg/L of mercury although water from well 41 contained 0.2 μg/L. Suggest discussion be modified to reflect such.

"Since" designates time; should it be "because" owing to a place or condition designation?

Why is the size of the aquifer pertinent? The ten-thousand square-mile area that it underlies is superfluous.

"fast flow of the aquifer"--First, flow usually is a volume whereas velocity is a rate. Second, the aquifer is immobile, although water does move through the basaltic rocks and sediment that combine to form the aquifer.

The USGS does not routinely collect samples for mercury analyses.

Section 4:

Par. 1 For those of us that are not familiar with RCRA jargon, it would help to define "administratively closed". This comment results from an inquiry made by Frank Sherman of the Idaho Department of Water Resources, State of Idaho.

Attachment 1

What does "PEW" stand for?

I assume LLLW is the acronym for low level liquid waste and that $K means thousands of dollars.

Last two pages contain sufficient acronymns to be incomprehensible to all but those that are intimately familiar with the process or schedule outlined.