United States Department of the Interior

GEOLOGICAL SURVEY

Water Resources Division
Idaho National Engineering Laboratory
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Idaho Falls, Idaho 83403-2230

June 1, 1987

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

Subject: REPORT: USGS comments on: "Closure plan for the Hexone spill west of CPP-660"

Dear Mr. Pierre:

Transmitted herewith are our comments for the subject report prepared by WINCO dated May 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: ▮▮▮▮▮▮▮▮▮▮▮▮▮
District Chief, USGS, ID-NV

<u>USGS review comments for "Closure plan for the Hexone spill</u>
<u>west of CPP-660."</u>

Question:

> What is hexone? I could fine it neither in an organic
> chemistry handbook nor in appendix VIII. As best as I can
> gather hexone may be Methyl iso-Butyl Keytone which is not in
> appendix VIII of 40 CFR 261. Second question: Why prepare
> the subject closure plan for the spill if hexone is not in
> appendix VIII? If the compound goes under another name, its
> proper name would be helpful to those who will eventually
> review the subject plan.

<u>Section 2.1:</u>

> Given the field conditions briefly described in section 1.1,
> i.e., the snowcover, most of the hexone not absorbed by the
> vermiculite would have been absorbed by the snow. Given the
> absorbtion by the snow and obviously cool temperatures,
> evaporation might have been minimal. Part of the contaminant
> could have migrated with the snowmelt and part may have
> evaporated during sublimation of the snow.

<u>Section 2.2:</u>

> If there was snowcover, the small amount of rainfall at the
> INEL is superfluous. Snowmelt would be the transport
> mechanism.

<u>Section 3:</u>

Par. 1   Contamination is a process or state of being. A contaminant
              migrates.

<u>Section 7.1:</u>

> The USGS has not sampled for hexone or Methyl iso-Butyl
> Keytone or whatever hexone is supposed to be. Therefore, the
> possibility of contaminant migration can neither be negated nor
> affirmed.   ^