

ORR-13-0026

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
SAM NUNN ATLANTA FEDERAL CENTER
61 FORSYTH STREET, S.W.
ATLANTA, GEORGIA 30303

June 7, 2013

4SFD-FFB

Mr. John Michael Japp
Federal Facility Agreement Manager
Department of Energy
Oak Ridge Operations Office
P.O. Box 2001
Oak Ridge, TN 37831

SUBJECT: Strategic Plan for Mercury Remediation at Y12, Oak Ridge Reservation,
DOE/OR/01-2605&D1 [3/13]

Dear Mr. Japp:

The Environmental Protection Agency has completed its review of the Strategic Plan for Mercury Remediation (DOE/OR/01-2605&D1). The Strategic Plan for Mercury Remediation at the Y-12 National Security Complex represents a comprehensive, well thought out strategy for addressing the ongoing Mercury (Hg) contamination at the Y-12 NNSA Complex. We agree that "no single solution exists to solve the mercury contamination issue at Y-12, and a multi-pronged approach is necessary". Correctly prioritizing mercury projects and seeking stable funding to address these priorities is critically important, especially in light of recent budget constraints. EPA concurs with the Strategic Plan's conclusion that the Outfall 200 Mercury Treatment Facility fits this approach best in the immediate future.

EPA has sought to increase the priority of Y-12 mercury response actions as we transitioned from accelerated cleanup plan activities in Fiscal Year 2008. EPA fully supports a CERCLA response action at Outfall 200. Therefore, the schedules in the Federal Facility Agreement must be updated to include this project. EPA requested milestones to establish the CERCLA response action schedule and documentation for this project in correspondence sent April 25, 2013 and again on May 7, 2013. DOE has not provided a formal response to these requests. Milestones consistent with those requested in the letters above and in General Comment 1 enclosed must be added to Appendix E and J to clearly show the sequence of events required to document and implement a CERCLA response action. EPA will only concur with the subject document pending an appropriate update of the Appendix E/J milestones for this project.

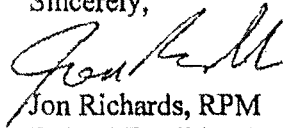
If you have any questions, please contact me at (404) 562-8648.

JUL 11 2013

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DOE/C

Sincerely,



Jon Richards, RPM
Federal Facilities Branch
Superfund Division

cc: J.Darby, DOE
R. Petrie, TDEC
C.Myer, TDEC

I. GENERAL COMMENTS

1. As requested in EPA correspondence on April 25, 2013 and May 7, 2013, the Outfall 200 CERCLA response action must include milestones for FFA Primary Documents in Appendix E and J that will document the basis for selecting and implementing this CERCLA response action. The documentation currently under development (Strategy and Conceptual Design) are limited to secondary supporting documentation and cannot replace documentation required under the FFA. Modify Appendix E/J to include the following milestones. Dates included below are suggested for discussion purposes in support of collaborative efforts among the FFA Parties to establish final dates prior to inclusion in a modified Appendix E/J:
 - a. D1 Feasibility Study Addendum (9/30/13)
 - b. D1 Proposed Plan (3/30/14)
 - c. D1 Interim Record of Decision Amendment (12/30/14)
 - d. D1 Remedial Action Work Plan (3/30/17)
 - e. D1 Remedial Action Report (3/30/20)
2. The Phase I & II RODs document a waiver for final cleanup of surface water (AWQC for mercury of 0.051 ug/L or 51 ppt). The Outfall (OF) 200 treatment plant design discharge standard should not default to the interim goal of 200 ppt that was developed for the Station 17 in stream standard. Ten years of interim actions based on the (200 ppt) goal have not demonstrated a significant positive impact on ecological receptors or the ability to meet the interim goal itself. Currently, the Phase I ROD has been identified as "*Not Protective*" under the most recent Five Year Review. DOE should construct the OF 200 treatment plant to meet the final in-stream standard at its point of effluent discharge, as measured during routine treatment plant operations. Since the OF 200 plant will not capture all sources, designing its operation so that the effluent discharge meets the final standard may increase the potential that the interim goal at Station 17 will finally be achieved and be responsive to ameliorating the Five Year Review "*Not Protective*" determination.
3. The Strategic Plan indicates the observed decreases in mercury loading to the UEFPC from Station 17 in recent decades have not resulted in corresponding decreases to mercury levels in fish tissue. The Strategic Plan does not elaborate further on the relationship between water and fish tissue mercury concentrations except to acknowledge that the relationship is non-linear and not well understood. In order to further justify the remediation strategy proposed in the Strategic Plan, additional details about this relationship should be provided. *Revise the Strategic Plan to*

include a basic summary of any information that is well understood about the relationship between mercury concentrations in water and fish tissue including relevant biogeochemical processes. The discussion should also highlight what aspects of the relationship are not yet well understood and indicate how the uncertainties related to this lack of understanding were handled during the development of the plan.

4. The document does not provide the information necessary to adequately understand how free phase Hg, a Principal Threat Waste (PTW), relates to the ongoing degradation found in the Upper East Fork Poplar Creek (UEFPC). It is understood that this source material may, in some specific conditions, not be currently impacting surface water. However, discernable zones of free phase Hg in soils and the building infrastructure is a PTW even if this PTW source material is currently not shown to be very mobile. The presence of Hg PTW and the strategy to mitigate this source and address the CERCLA statutory reference of treatment of principal threats must be included the strategy. Therefore, discussion and planning for free phase mercury found in subsurface soils (and not only in storm sewer pathways or other currently mobile pathways) must be part of remediation planning at Y-12 and should be presented in this strategy document.
5. Table 4 identifies many issues in the form of questions that must be refined/resolved during the course of implementing this strategy. Listing these key uncertainties in Section 1 may highlight attention and management of these matters. A summary discussion of the evolving nature of this strategy and potential updates in the future should be included.

II. SPECIFIC COMMENTS

1. **Executive Summary, p. ES-1** - The term "contact water" is included in the last paragraph. Explain the term.
2. **Executive Summary, p. ES-2** - How is targeted legacy material disposition related to the ongoing uncontrolled mercury flux issue?
3. **Executive Summary, p. ES-2** - Revise (c) to state: development of required planning documents which effectively document the phased scope and schedule for the planned deployment of CERCLA operable unit response actions. This may include some generic documentation for multiple areas if such documents develop information that is common to all operable unit phases. However generic documentation will not take the place of an operable unit's specific scope and schedule response action planning and completion reporting.
4. **Executive Summary, p. ES-2** - At the end of the first sentence of the final paragraph, revise to state: "and monitor the scope of CERCLA response actions at Y-12."
5. **Introduction, p. 1, First Bullet** - replace "as low as reasonably achievable" with "to protect human health and the environment."

6. **Introduction, p. 1** - The statement "While comforting to know that human health has not been affected to date..." appears to be more definitive than the ATSDR statement in the first sentence. The first sentence states no adverse health effects ... "due to most..." This applies to most past and current exposure but does not apparently apply to all exposures. Furthermore, the matter of mercury flux effect on the environment, the acknowledged greatest adverse mercury release exposure effect, appears to be understated relevant to human exposure and an ecological exposure summary seems appropriate at this up front location in the document.
7. **Section 2.1, p. 3** - The first sentence should acknowledge downstream impacts beyond EFPC, down to and including the CERCLA Operable Unit Lower Watts Bar Reservoir.
8. **Section 2.1, p. 3** - Include "ecological receptors" to the end of the second sentence.
9. **Section 2.2, p. 5** - The middle of the paragraph refers to adding IFDP scope to the baseline in discrete projects. Include a statement that this IFDP scope has been added to the scope and schedule of FFA cleanup projects in FFA Appendices C, E and J. Include a statement that the NCP framework for cleanup and the FFA process and schedules, in particular phased response actions in Operable Units, will not be replaced by the DOE framework.
10. **Section 2.3.1, p. 6** - It is not clear why Bear Creek Valley would be included in a mercury strategy document for the Y-12 UEFPC mercury source problem.
11. **Section 2.3.1, p. 6** - The summary of the Phase I ROD states this decision led to an interim action to protect surface water. This ROD included those mercury Principal Threat Waste sources believed to be migrating and impacting surface water. This summary should describe this focused use of Principal Threat Wastes as an interim remedial goal in the Phase I ROD (i.e., migration threat only) and acknowledge that Principal Threat Wastes that are not mobile are also addressed explicitly in this strategy.
12. **Section 2.3.1.1, p. 6** - The final sentence of the first paragraph should describe this as an interim goal that used the interim ARAR waiver and to date, the goal has not been met.
13. **Section 2.3.1.1, page 6** - The discussion of the Phase I ROD in this section is incomplete. Please include references cited both in the Phase I ROD (DOE 2002) and Phase II ROD (DOE 2006) that refer to the need to address free-phase Mercury (Hg) as a principal threat waste (PTW) as required by the Phase I ROD. The discussion of the Phase II ROD requirements should cite that part of the second ROD that clarifies, "Hg PTW (has) been addressed in the Phase I ROD".
14. **Section 2.3.1.1, p. 8** - The first sentence on this page should be revised to state: "...from exposure to hazardous substances in the uppermost two feet of soils and..."
15. **Section 2.3.1.1, Soils, Sediments, and Subsurface Structures, P.6-8** This Section does not provide a clear explanation of the relationship and applicability of the Phase I Record of Decision (ROD) and the Phase II ROD. It is unclear what, if any, discrepancies exist between the Remedial Action Objectives (RAOs) and Remedial Goals (RGs) presented in each ROD.

Also, it is unclear if there are any situations in which both RODs could be considered applicable to the same remedial action. *Revise the Strategic Plan to include additional information about the scope, applicability, and RAOs/RG presented in each ROD. Be sure to address how discrepancies between these documents will be handled in situations where they are both considered applicable.*

16. **Section 2.3.1.3, p. 8** - It would be informative to stakeholders to include a statement describing when these final actions are scheduled based on current planning assumptions.
17. **Section 2.4, p. 9** - This discussion states that costs for working within PIDAS are not included for Beta-4 and Alpha-5. Discuss whether NNSA is funded, or is seeking funding, to develop plans to alter the PIDAS configuration on a schedule that is ahead of the start of CERCLA response actions at these structures.
18. **Section 2.4, p. 10** - In the complete first sentence, replace “remediation” with “response actions.”
19. **Section 2.6, Current Y-12 Conceptual Model**, indicates data collected during 2012 showed a significant decrease in the Outfall 200 average mercury flux from 31 grams per day (g/day) in 2011 to 7 g/day. Conversely, the Station 17 average mercury flux decreased by only 3 g/day, from 33 to 30 g/day. The conceptual site model for mercury sources at Y-12 attributes approximately 70-80 percent of the flux observed at Station 17 to Outfall 200. Based on the above information, there appears to be a significant residence time required for the mercury contamination discharged from Outfall 200 to reach Station 17. A specific explanation of the fate and transport of mercury contamination after it is discharged from Outfall 200 but before it reaches Station 17 should be provided to further support the proposed remediation strategy. *Revise the Strategic Plan to include an explanation of the estimated time required for mercury contamination discharged from Outfall 200 to reach Station 17. Include a discussion of the processes by which mercury in this section of UEFPC is transported. Also, clarify which of the near-term remediation strategies discussed in the Strategic Plan will directly target mercury in this part of UEFPC. For example, it is unclear if any of the traps recently installed for the removal of free mercury are located between Outfall 200 and Station 17. Revise the Strategic Plan accordingly.*
20. **Table 3, p.11** - Consider adding a column to list DOE Document numbers related to the actions taken. This would improve this strategic plan as a resource of links to past efforts.
21. **Section 3, p. 15** - Refer to planning documentation in RmAWPs and RAWPs in addition to the WHP.
22. **Section 3, p. 15** - Include a brief summary of the current planned timeline for the overall set of mercury cleanup projects in the FFA.
23. **Figure 7, page 16, Section 3.3.3, page 20, Table 4, page 23** – The figure, section and table refers to a Treatability Study for Soils at Y-12 (listed in References, as well). Has this document been shared with the regulators? And if not, will there be future opportunity to review?

24. **Figure 7** - "Free Mercury Removal" is not clear. Explain and include CERCLA PTW.
25. **Section 3.1, p. 16** - Describe why the 9201-5 sump is not used.
26. **Section 3.1, p. 17** -- The second paragraph should refer to Subtitle C and D Landfills; not Schedule.
27. **Section 3.1, p. 17** - The final sentence of the second paragraph states "this work has been initiated. It would help if "this work" was clear and specific project documentation for "this work" was referenced. Additionally, the next paragraph should cite specific project documentation for "These and other technology development initiatives are ongoing..."
28. **Figure 8** - Excellent strategic schedule. RAWP and RAR documents needed for OF 200. Explain why "Free Mercury Removal" is an operational activity and not a CERCLA response action. The figure should represent PTW elemental mercury.
29. **Section 3.3** - There is an incorrect statement that groundwater and surface water end states are not determined. It appears this section is missing a description of which end states have been determined (e.g., building demolition and land use). Land use expectations do not determine groundwater and surface water resource classifications. Clarify that these end state resources have been determined by the State and that the timing and ability of achieving these resource based end states have not been determined.
30. **Section 3.3.1, p. 18** - The final sentence of the second paragraph needs to state that the waste is not RCRA Hazardous. Meeting LDR does not necessarily mean the solid waste is no longer hazardous.
31. **Section 3.3.2, p. 18** - Include the CERCLA bias against off-site land disposal of untreated waste (NCP 300.430(f)(ii)(E)) and Off-Site Rule (300.440).
32. **Section 3.3.3, p. 18** - The completed study for soils treatment is cited. Include a summary of the study conclusions.
33. **Figure 8, page 19** -- This schedule should include the CERCLA milestone deliverables associated with the OF 200 MTF. Namely, the FS Addendum, Proposed Plan, IROD Amendment, and Remedial Action Work Plan.
34. **Section 3.3.3:** In the LDR discussion there needs to be a brief discussion on the possibility of underlying hazardous waste constituents in the waste at the point of generation. If any waste has other hazardous waste constituent (underlying hazardous waste constituents) at concentrations above the respective universal treatment standards, the generator would have to address those constituents as well.
35. **Section 3.3.5, p. 22** - Summarize the CERCLA response action assessment/evaluation/decision processes here and identify operable unit phases and documentation of response actions planned.

Specific documentation for response action phases implemented as operable units must include response action work plans that describe the planned work and documentation (e.g., Design, Design Reports, design characterization SAP/QAPPs, WHP for EMWWMF waste, PCCR), as necessary based on the scope, complexity and phase of the operable unit response action. This comment should be addressed together with Specific Comments 37, 39, 44, 46, 48, 50, 57, and 58 below.

36. **Section 3.4.2, p. 22** – The OF 200 treatment plant design discharge standard should not default to the interim goal that was developed for the Station 17 in stream standard. The BSWTP was designed earlier in the cleanup and its design/operation also recognized that its effluent was expected to be well below the Station 17 in stream standard. Although this lower standard was not set for the effluent of BSWTP, it is now appropriate for the OF 200 plant to be designed to support the final Station 17 in stream standard. The goal of this plant is to reduce flux. OF 200 should not be designed to allow the maximum possible flux based on an interim goal for an in stream standard at Station 17. Over ten years of interim actions based on this goal have not demonstrated a significant positive impact on ecological receptors or the ability to meet the interim goal itself. Currently, the Phase I ROD has been identified as Not Protective under the most recent Five Year Review. DOE should construct the OF 200 treatment plant to meet the final in stream standard at its point of effluent discharge, as measured during routine treatment plant operations. Since the OF 200 plant will not capture all sources, designing its operation so that the effluent discharge meets the final standard may increase the potential that the interim goal at Station 17 will finally be achieved and be responsive to ameliorating the Five Year Review “Not Protective Determination.”
37. **Section 3.4.2, p. 22** - CERCLA documentation is missing from the final paragraph. It may be important to define the DOE project terminology but CERCLA documentation must be planned.
38. **Section 3.4.2** – The section accurately states what this Hg strategy objective is with respect to DOE’s view of how its central remedial action (OF 200 MTF) will achieve remedial goals. However, this section does not refer to remedial action objectives that will need to be brought forward as stipulated in the existing Phase I and Phase II IRODs or further developed and included in the pending I ROD Amendment (as relates to surface water cleanup). It is recognized this document is not the place for this detailed information, but this section should point toward or provide a placeholder for consideration of additional remedial goals that may need to be developed before design completion.
39. **Tables 4 & 5, page 23, 24** – The tables provide a well thought out strategy for the many contingencies or critical path elements that will be required as this project becomes reality. The tables do not provide enough notation that many of the documents and studies will require regulatory approval. EPA recommends a ‘regulatory critical path’ column be added to Table 4 (similar to Table 5); or, at a minimum, an asterisk footnote added to strategies and activities where regulatory interface will be required or may be anticipated.
40. **Table 4 - D&D Waste** - processing all facilities consecutively must be balanced with funding available for early action on environmental media.

41. **Table 4 - Building Slab** - The end state must address the need to access PTW mercury in the subsurface structure and surrounding soils.
42. **Table 4 - Water** - The interim surface water goal of 200 ppt at Station 17 is not an end state. The surface and groundwater end states should be tied to the State's use classification.
43. **Table 5, Near-Term Activities to Reduce Mercury Releases, P.24** The last sentence of the "Mercury-Contaminated Soils Treatability Study" text provided in the Activity column of Table 5 states, "one additional technology which did not receive a soil sample for demonstration was recommended for further evaluation". No additional information is provided about this technology. *Revise the Strategic Plan to provide more information about the referenced technology.*
44. **Table 5, page 24** – The first activity description, last sentence should include the Regulatory/DOE submittals with approximate schedule. The information should be repeated or referred to in the Regulatory/DOE submittal column.
45. **Table 5, page 24** – The Mercury Contaminated Soils Treatability Study notation does not show a published date. It is assumed the Regulatory/DOE submittal Report has not been submitted. This is a concern since the activity column informs that "the treatability studies were successful...". Please clarify either in a response or in an appropriate section (3.4.2?), DOE's intent to provide this document to the regulators.
46. **3.4.3.1 – 3.4.4, pages 25, 26** – The text in these sections should clarify that such activities as start of construction, scoping activities; or submittals of treatability, feasibility studies, and WHPs will require regulatory interface and/or approval.
47. **Section 3.4.3.1, p. 25** - How does DOE assure that LM is finite and operations are not continuing to expand the universe of LM?
48. **Section 3.4.3.1, p. 25** - This section describes FFA WHP documents to plan work for waste going to the CERCLA Landfill. Describe the FFA planning documents for all response action phases and how this document is used to develop the plans/reports for incremental phases. Include a description of how CERCLA derived waste disposition that is not sent to the CERCLA Landfill is not a part of the planned response action and documented in other plans since a a WHP will not be developed.
49. **Section 3.4.3.1, p. 25** - Define the "gap analysis" and how/when it will be reported.
50. **Section 3.4.3.1, p. 25** - CERCLA documentation is missing from the final paragraph. It may be important to define the DOE project terminology but CERCLA documentation must be planned.
51. **Section 3.4.4, p. 27** - The final sentence of the first paragraph states that work on soils is sequenced after building demolition. The strategic plan should also describe the timing of the subsequent sequencing of soil work. The plan must show balanced approach to sequencing soil work so that all soil cleanup is not deferred until after all building demolition. The current

Dynamic Planning Model shows this balanced approach. Describe this balanced approach more thoroughly in the plan.

52. **Section 3.4.4 and 3.5, pp.26 and 27** - The mercury assessment technology development study in 2013 sounds very interesting and could be a critical tool to refining the conceptual model for residual mercury source identification in the earlier stages of overall strategic planning. However, the study appears to not be as fully integrated into CERCLA planning as it might be if the three parties were to collaborate more on its potential application. This strategic plan should look into specific opportunities to apply this assessment technology. Ideally, the plan could be deployed at a scale that supports technology development needs and at the same time provides results that would support CERCLA mercury soil/source assessment needs and be included in CERCLA documentation. Although this integration appears to be the purpose of the ARTD Program within EM and this strategic plan, specific efforts to integrate technology development and CERCLA assessment needs appear to be substantially internal to DOE EM. This strategic plan is an opportunity to collaborate with EPA/TDEC on this tool and leverage the technology development resource to meet CERCLA assessment objectives. At most, this plan refers to those objectives without any specifics for an applied outcome and the reporting of the results in the context of CERCLA documentation. This comment emphasizes assessment in this context due to this being an earlier objective in the overall sequence of cleanup. Similar efforts should be considered to apply technology development for CERCLA purposes (e.g., treatability studies) and reporting. DOE should consider formally submitting applied technology development reports as FFA secondary documents.
53. **3.4.4., (top of) page 27** – The Treatability Study Report cited on the previous page has not been reviewed by EPA or TDEC. See previous comments. The discussion that follows on page 27 is incorrect and must be revised or omitted. The ‘current default treatment’ as cited here for the mercury contaminated soils is governed or stipulated *only by* the Phase II ROD. The Phase II ROD selected remedy does not satisfy the intent to address free phase mercury or Principal Threat Waste (PTW). The Phase II IROD (DOE 2006), in Section 1.4, page 1-6, states its limited scope with respect to soils remediation: “The ROD for Phase I interim source control action in the UEFFPC Characterization Area (DOE 2002a) constitutes the initial phase and addressed interim actions for *remediation of principal threat waste*, mercury-contaminated soils, sediments, and point groundwater discharges that contribute contamination to surface water.” [Italicized underscore added for emphasis]. Please revise this section accordingly
54. **Sections 3.5, and 3.6** - The final paragraph of Section 3.5 includes a statement that “*investments in the characterization of mercury sources near and around facilities... .. will enable refined cost estimates for cleanup and allow for more surgical treatment in place as an alternative to the baseline technology, excavation.*” This statement appears to be a fundamental CERCLA RI objective that was not met by the watershed RI due to its overall assessment scale. Earlier in this strategic plan (Section 3.4.4), it states “...*depth and areal extent of mercury contamination under and around buildings (basements) remains largely unknown...*” The bullets defining the outcome of technology development (i.e., p. 28 prior to Section 3.6) are typical NCP objectives for the RI/FS process. Together, these statements reveal significant shortcomings in the watershed scale RI/FS implemented in the 1990s. It is noted that FFA Appendix E and J include

no RI starts to address these significant data gaps highlighted in the statement above. This strategic plan needs to include CERCLA assessment activities and documentation that will support CERCLA response action evaluations, decisions and remedy implementation. The strategy misses the mark on this matter and seems to emphasize Technology Development to meet CERCLA data assessment needs not met by the RI. Furthermore, WHPs appear to be the only CERCLA documents planned and all other CD-3 documents are expected to meet CERCLA documentation objectives. Much work is needed here on the CERCLA strategic plan.

55. **Table 6** - this table may be appropriate to deploy excavation actions based on the old RI but would be inconsistent with Section 3.5.
56. **Section 3.7, p. 30** - The paragraph beginning with "Mercury remediation projects..." refers to the following that are not at all clearly demonstrated:
- Risk Management Plans
 - Contingencies
 - Risks managed (including funding availability) are managed in the baseline.
- Expound on how these plans/contingencies and risks are documented and managed.
57. **Section 3.7, p. 30** - Describe how the CERCLA assessment, decision and remedy implementation process will be documented to support the deployment of the opportunity in the first bullet. EPA does not support use of removal actions for these activities due in part to DOE's recent efforts to minimize EPA oversight of CERCLA removal actions at ORR, and the fact that early and interim remedial actions can be deployed in a timely manner.
58. **Section 3.7, p. 30** - The opportunity as described in the second bullet is not clear. First, it appears that Section 3.5 actions are evaluating the use of the existing soils/sediment RAWP as it pertains to mercury in and around the buildings. The scope of this RAWP is limited to the uppermost 2 feet and currently does not address a low mobility PTW at depth greater than 2 feet. It is not clear how this supports further CERCLA documentation consolidation. DOE may choose to utilize FFA documentation to meet its internal needs. EPA does not support the use of internal DOE documents to meet the needs of CERCLA documentation.
59. **Section 3.7, Risks and Opportunities, P.30** The bullet on "Targeted hot spot removal" should include Principal Threat Waste as part of the criteria used to remove mercury "hot spots".
60. **Figure 10, page 31** - See previous comment #9: Please revise the CERCLA Decision Document box, UEFPC Phase II ROD, to indicate soils remediation applies to the first (1st) two feet of soil (for worker protection). Please revise the CERCLA Decision Document box, UEFPC Phase I ROD and ESD, to include a bullet entitled, "Mercury Principal Threat Waste" or "Hg PTW".
61. **Section 4.1, p. 32** - Add the following sentence prior to the final sentence of this section and revise the final sentence as follows: "Enforceable milestones are established based on consensus priorities with efforts to align milestones with the overall pace of cleanup and projected funding. Annual funding levels, both realized through allocations and projected will affect the DOE OREM Program baseline."

62. **Section 4.2** – Please add a bullet adjacent to the third bullet that incorporates the Phase I ROD stipulation that free phase mercury will be addressed as “Principal Threat Waste” and is to be addressed in a subsequent (pending?) IROD Amendment and is not ‘defaulted’ to the Phase II ROD stipulation for soils.
63. **Section 4.2, p. 32** - Consistent with page 33, in the third prioritization bullet, include “immediately” prior to “follow” in the final sentence. The final sentence of the fourth prioritization bullet is not consistent with the preceding bullet. Use the same sentence in the preceding bullet as modified. Use this same sentence for the fifth bullet.
64. **Section 5, p. 35** - Given the long term nature of this strategic plan, the conclusions should emphasize the use and update of this plan as necessary for the thirty-plus year duration of the program.