



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF  
SOLID WASTE AND  
EMERGENCY RESPONSE

August 1, 2014

Rudy Guercia  
U.S. Department Of Energy  
Richland Operations Office  
P.O. Box 550  
Richland, WA 99352

Re: Draft Remedial Design Report/ Remedial Action Work Plan for the 300 Area (300-FF-1, 300-FF-2 & 300-FF-5 Operable Units) for the Hanford Superfund Site in Richland, WA

Dear Rudy:

Thank you for the opportunity to review the Draft *Remedial Design Report/ Remedial Action Work Plan for the 300 Area (300-FF-1, 300-FF-2 & 300-FF-5 Operable Units)* (RD/RAWP) for the Hanford Superfund Site in Richland, WA dated May 7, 2014. EPA reviewed the (RD/RAWP) in light of EPA's *Remedial Design/ Remedial Action Handbook*. Detailed comments are provided in Attachment A.

Prior negotiations and document submittal present that the objective of the enhanced Monitored Natural Attenuation (MNA) is to achieve cleanup levels within 50 years. This is not mentioned in this document.

No timeframes or performance metrics are presented. These should be established in order to effectively evaluate the protectiveness and progress of the remedy. Additional milestones need to be established for the 300 Area Groundwater.

The milestones in Table 3-1 are inconsistent with the Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement). EPA is concerned that proposed completion milestones are after the Tri-Party Agreement date.

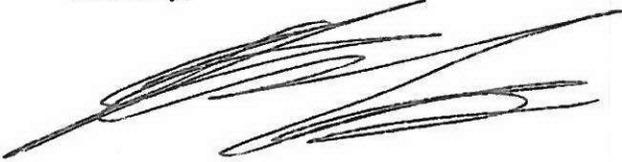
Temporary surface barriers should be included in the "prevent enhanced recharge" institutional control to maintain integrity of the surface barrier and to ensure protectiveness in the future.

The RD/RAWP should clearly identify the steps to be taken with expected results for the various phased approach on the application of the remedial action. The plan should also have the flexibility of any possible alternatives that may be expected due to known uncertainties (e.g. failure of injection, failure to form adequate sequestration, etc.). Please note that such steps/alternative scenarios are usually identified in test plan(s) (e.g. apatite sequestration for Sr-90 in N area). The report is vague with no achievable

action goal (for both implementation, evaluation of results, etc.) identified.

I look forward to working with you and the State of Washington Department of Ecology to ensure that the Hanford Superfund Site will be protective of human health and the environment. Please contact me at (703) 603-0055 with any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Benjamin Simes". The signature is fluid and somewhat stylized, with several overlapping strokes.

Benjamin Simes, Remedial Project Manager  
Federal Facilities Restoration and Reuse Office

Attachment

cc: Dennis Faulk, U.S. EPA Region 10  
Dib Goswami, WA Department of Ecology  
Rick Bond, WA Department of Ecology  
Robin Varljen, WA Department of Ecology  
Mike Thompson, Department of Energy, Richland  
Jaime Zeisloft, Department of Energy, Richland



## CHPRC - REVIEW COMMENT RECORD (RCR)

1. Date: 10 June 2014

2. Review No.

3. Project No.: SGW-56993, Draft A

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12. Item	13a. Comments	13b. Basis	13c. Recommendation	14. Reviewer Concurrence Required (Y or N)	15. Disposition (provide justification if NOT accepted)	16. Status
	site optimization?					
8	I 4-1 4.1 Should the state of Washington be added here?					
9	I 4-1 37 How will the facilities not clean closed be aware of the ICs?					
10	I 5-1 5.1.1 Will air monitoring be conducted? Rad or Dust. In the soil addendum air monitoring is being conducted clarify.					
11	I 5-3 2 How will this be documented? Will the SHPO review?					
12	I Chapter 6 is not complete.					
13	I,G,S Include a summary RAO sheet. Include RAOs and the tasks (briefly), documents associated with each, also include start and finish dates.					
14	G, 1-1 14 space 300 and area					
15	G, 6-1 Chapter 6 is not complete.					
16	G 3-1 Include dates in Table 3-1					
17	G, 3-1 Clarify, in the integrated document a Performance Monitoring Plan is mentioned, in Table 3-1 it is not. There is a Stage A Delivery Performance Report.					
18						

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19	G 3-4 41 When will groundwater conditions be favorable? Month or range?					
20	G 3-5 4 What kind of groundwater monitoring?					
21	G 3-5 Are there figures, drawings for the planned installed piping?					
22	G 3-8 9 Identify what circumstances would be present for selection of water from the hydrant or the river					
23	G 3-9 3.2.1.5, 3.2.2 These small sections were written great, they explained the task, and the plan describing details.					
24	G 3-10 27 Explain the difference between a Supplemental Field Investigation Summary Report and a Stage A delivery Performance Report.					
25	G 4-1 4.1.2.1 42 Describe the circumstances for using the holding tanks or preferring to use the tank trucks.					
26	G 4-3 Include a table describing days and tasks (injections)					
27	G 4-5 12 Are there drawings or figures for the ERT placement?					
28	G 4-5 24 Will the Remedy Implementation SAP cover these items, clarify.					

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29	G, Prior negotiations and document submittal present that the objective of the enhanced MNA is to achieve cleanup levels within 50 years. This is not mentioned in this document.					
30	G,S,I No timeframes or performance metrics are presented. These should be established in order to effectively evaluate the protectiveness and progress of the remedy.					
31	S, A presentation including figures and diagrams on the VPU was given to EPA on a site visit in June, these document are not included in this report.					
32	S, The milestones in Table 3-1 are inconsistent with the FFA.					
33	S, Temporary surface barriers should be included in the "prevent enhanced recharge" institutional control to maintain integrity of the surface barrier and to ensure protectiveness in the future.					
34	S Provide designs on the temporary surface barriers.					
35	S, Include figures for void fill piping, proposed excavation limits, VPU, remaining infrastructure, and the location of signs					

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36	S 4-3 What amount of soil is characterized?					
37	S, 4-3 Describe advanced techniques.					
38	S 4-4 Clarify what shipping papers will be used					
39	S, 4-7 4.3.2.5 Describe in greater detail the "characterize-and-remediate-in-one-step" methodology.					
40	S, 4.3.2.4 No designs are present for 324, will that be included in a separate document?					
41	S, 4-9 Include figures for Table 4-1 and 4-2.					
42	S, C-4 Will the C10 monitoring report be submitted to EPA and WA?					
43	S, C9 Irrigate until vegetation takes hold.					
44	Include a Gantt chart for project tasks.					
45	Describe in greater detail the VPU extraction process					
46	I, EPA reserves the right to request the 90% design for review and approval of waste sites and groundwater.					
47	1. The integrated RDR/RAWP is expected to contain a detail (not common) information to support remedy implementation. Details should include the					

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	<p>following main elements:</p> <ul style="list-style-type: none"> <li>a. The actual design to meet the 300 Area ROD/ROD not a simple description how the site remedies will be designed in the future.</li> <li>b. The installation procedure, protocols, and related aspects</li> <li>c. Operational and maintenance details:</li> </ul>					
48	<p>1. RDRA/RAWP should clearly identify the steps to be taken with expected results for the various phased approach on the application of the remedial action. The plan should also have the flexibility of any possible alternatives that may be expected due to known uncertainties (e.g. failure of injection, failure to form adequate sequestration,</p>					

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	etc.). Please note that such steps/alternative scenarios are usually identified in test plan(s) (e.g. apatite sequestration for Sr-90 in N area). The report is vague with no achievable action goal (for both implementation, evaluation of results, etc.) identified.					
49	The report should define the expected duration of the tests/application and evaluation assuming funding is available.					