1215197

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
3100 Port of Benton Blvd • Richland, WA 99354 • (509) 372-7950
711 for Washington Relay Service • Persons with a speech disability can call 877-833-6341

June 28, 2012 12-NWP-104

Mr. Briant Charboneau
United States Department of Energy
Richland Operations Office
P.O. Box 550 MSIN: A6-33
Richland, Washington 99352

Re: Department of Ecology (Ecology) Comments on the *Remedial Investigation Report for the 200-PO-1 Groundwater Operable Unit,* DOE/RL-2009-85, Draft A

Dear Mr. Charboneau:

Ecology has completed its comment resolution and accepts the latest redline version of the *Remedial Investigation (RI) Report for the 200-PO-1 Groundwater Operable Unit* (DOE/RL-2009-85, Draft A). In resolution meetings with the United States Department of Energy (USDOE) and CHPRC staff, we agreed to address some comments in a supplement to the RI to be completed prior to the Feasibility Study (FS). The supplement will include additional data collected to fill data gaps described in the Ecology comments. As part of an updated RI, or within the supplement, the risk assessment will be reevaluated with the new data consistent using the methodology provided in the draft RI Report. Ecology is particularly concerned about contaminants for which there was limited data, such as total chromium which had only three samples. 0088565

Ecology recognizes that other issues that are not closed are broader than 200-PO-1 in application:

- Use of ProUCL outside of the methods provided by United States Environmental Protection Agency (EPA) in the ProUCL guidance (EPA. 2010. ProUCL version 4.1.00 technical guide). Ecology believes the 95% Upper Confidence Limit (UCL) should be used as an estimate of Exposure Point Concentration (EPC), rather than a 90th percentile, to compare against a mean cleanup standard.
- The lack of a documented approach defining how the various 100 and 200 Area units will integrate risk assessments and the results from those assessments. The 200-PO-1 RI addresses only existing contamination and not contamination that may reach groundwater over the coming decades. The USDOE expectation is that the soil units will address that contamination. However, there is no strategy to integrate these risks to ensure that the groundwater remedy selected for 200-PO-1 will address the future contamination, if needed.

Ecology will consider these issues resolved when changes agreed to in the comment responses for DOE/RL-2009-85, Draft A are clearly delineated and incorporated. However, Ecology is expecting

RECEIVED
JUL 09 2012
EDMC

200-PO-1

that a supplement to the RI be submitted prior to the 200-PO-1 FS with the proposed path forward for the FS.

If you have any questions, please contact Kim Welsch at 509-372-7882 or kim.welsch@ecy.wa.gov or me at 509-372-7941 or nina.menard@ecy.wa.gov.

Sincerely,

Nina M. Menard

Nina M. Menard
Environmental Restoration Project Manager
Nuclear Waste Program

kw/dbm

cc w/enc:

Craig Cameron, EPA
Dennis Faulk, EPA
John Morse, USDOE
Stuart Harris, CTUIR
Gabriel Bohnee, NPT
Russell Jim, YN
Susan Leckband, HAB
Ken Niles, ODOE
Nina Menard, Ecology
Kim Welsch, Ecology
Administrative Record: 200 Area
Environmental Portal
Hanford Operating Record General File
USDOE-RL Correspondence Control