



June 28, 2013

Mr. Jonathan A. Dowell, Assistant Manager  
 River and Plateau  
 Richland Operations Office  
 United States Department of Energy  
 PO Box 550, MSIN: A5-11  
 Richland, Washington 99352



Re: Comments on the Remedial Investigation/Feasibility Study Work Plan to Evaluate the  
 100-OL-1 Operable Unit Pre-Hanford Orchard Lands, DOE/RL-2012-64, Draft A  
 1220928

Dear Mr. Dowell:

This letter transmits recommendations from the U.S. Environmental Protection Agency and the Department of Ecology that will result in significant changes to the above-referenced document.

Rather than submit detailed comments now, we will review the revised document after the following changes have been incorporated:

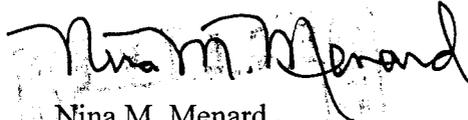
1. Using X-ray Fluorescence (XRF), a screening level of 250 mg/kg lead will be used to characterize the 100-OL-1 OU. Since it is known that arsenic is collocated with lead it is not necessary to screen for arsenic separately with XRF. This initial screening will locate areas above and below 250 mg/kg and identify the areas that will need full Inductively Coupled Plasma analysis (areas with lead greater than 250 mg/kg) for both Lead and Arsenic.
2. The work plan indicates that 26 samples would be collected at each decision unit although the decision units vary in size from 1 acre to 291 acres. Logically, it does not make sense to have the same number of samples for decision units with such a vast variation in size; therefore, we request the number of samples be determined based on the area of the decision unit.

When the revised document is submitted, the review process for initial documents submittal outlined in Section 9 of the Hanford Federal Facility Agreement and Consent Order will be followed.

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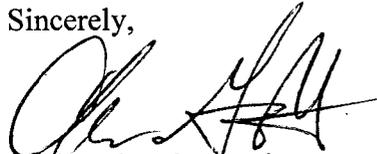
If you have any questions, please contact Chris Guzzetti at [guzzetti.christopher@epa.gov](mailto:guzzetti.christopher@epa.gov) or 509-376-9529 or Kim Welsch at [kiwe461@ecy.wa.gov](mailto:kiwe461@ecy.wa.gov) or 509-372-7882

Sincerely,



Nina M. Menard  
Project Manager  
Washington State Department of Ecology

Sincerely,



Christopher Guzzetti  
Project Manager  
Environmental Protection Agency

cc electronic:

Dennis Faulk, EPA  
Chris Guzzetti, EPA  
Briant Charboneau, USDOE  
Jim Hansen, USDOE  
John Neath, USDOE  
John Sands, USDOE  
Amoret Bunn, PNNL  
Ken Niles, ODOE  
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cc: Stuart Harris, CTUIR  
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Russell Jim, YN  
David Rowland, YN  
Steve Hudson, HAB  
Administrative Record: 100-OL-1 OU  
Environmental Portal