



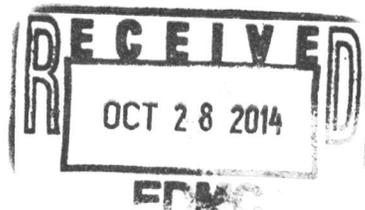
STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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October 23, 2014

14-NWP-223

Mr. Briant Charboneau, Federal Project Director
Richland Operations Office
United States Department of Energy
PO Box 550, MSIN: A5-11
Richland, Washington 99352



Re: United States Department of Energy – Richland Operations Office (USDOE-RL) failing to meet the *Remedial Investigation/Feasibility Study Work Plan for 200-PO-1 Groundwater Operable Unit* (DOE/RL-2007-31, Rev 0) commitments to include potential vadose zone contaminates impacts to groundwater

Reference: Letter 12-NWP-104, dated June 28, 2012, from N. M. Menard, Ecology, to B. Charboneau, USDOE-RL, “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:

The Department of Ecology (Ecology) is concerned that USDOE-RL is unwilling to commit to evaluate the final calculated contributions of soils sites and potential contaminant movement through the vadose zone contributing to future groundwater impacts for the 200-PO-1 and 200-BP-5 Operable Units. Ecology is also concerned that neither USDOE-RL nor CH2M Hill Plateau Remediation Company (CHPRC) would commit to update the modeling as soil sites and tank farms are remediated and evaluated, leading to the development of groundwater source terms.

On September 24, 2014, USDOE and CHPRC presented the “Groundwater Flow Modeling to Support the 200-BP-5 and 200-PO-1 RI/FS Process” to Ecology. During this presentation, Ecology stated that this latest modeling appears to lack adequate integration of already available vadose zone data/information into the 200-BP-5 and 200-PO-1 modeling. CHPRC staff indicated they would make an approximation to account for future contribution of contaminants to the groundwater from the vadose zone.

This issue was first identified in the referenced letter Ecology sent to USDOE on June 28, 2012. One of the issues identified in 2012 was that the 200-PO-1 Remedial Investigation (RI) addresses only existing contamination and not potential contamination that may reach groundwater in the future. Ecology recognizes several integration opportunities that would provide vadose zone information on potential contaminants that may impact 200-BP-5 and 200-PO-1 groundwater plumes.

In the referenced work plan, DOE/RL-2007-31, Rev 0, USDOE-RL committed to analyze and model the likely future contamination migration and its potential impacts to the groundwater.

The following are part of the commitments in sections 5.2 and 5.4 of the work plan.

- Compile and summarize the inventory data available for waste sites that may contribute to the 200-PO-1 groundwater.
- Use the information collected in related tasks, to determine any added characterization information needed for modeling.
- Continue additional investigations as needs are identified. Analyze and summarize available data.
- The analysis and modeling will consist of evaluation of likely future contamination migration.
- Any recommendations regarding appropriate analysis and modeling approaches will be presented to, and discussed with, the Tri-Parties prior to implementation.
(emphasis added)

Ecology expects USDOE to meet commitments listed in the work plan, which includes integration of available related data and adequate update/supplement to the 200-PO-1 RI, as well as development and compatibility with the expected 200-BP-5 RI.

While we are encouraged that an effort will be made to include some vadose zone input, we need a commitment to revise the modeling to incorporate the final groundwater input information from the soils sites and tank farms. In two previous meetings with USDOE-RL held on August 18, 2014 and September 9, 2014, USDOE-RL showed no interest in discussing the appropriate strategy and available information for future contamination migration to groundwater plumes affecting the 200-BP-5 or 200-PO-1 Groundwater Operable Units. In addition, CHPRC stated firmly this would not happen.

Ecology encourages USDOE-RL to consult with Ecology on the strategy and criteria in developing the model for the 200-PO-1 and 200-BP-5 Groundwater Operable Units, as well as the development of other supporting document preparations.

To discuss a path forward to resolving these concerns, please contact me at (509) 372-7941 or nina.menard@ecy.wa.gov, or Kim Welsch, 200 Area ER Lead, at (509) 372-7882 or kim.welsch@ecy.wa.gov.

Sincerely,

Handwritten signature of Kim Welsch in black ink, with the initials "FDR" written below it.

Nina M. Menard, Project Manager
Environmental Restoration
Nuclear Waste Program

kw/tkb

cc: See page 3

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cc electronic:

Emerald Laija, EPA
Rod Lobos, EPA
Jim Hansen, USDOE
Naomi Jaschke, USDOE
Alaa Aly, CHPRC
Marty Doornbos, CHPRC
Curt Wittreich, CHPRC
Ken Niles, ODOE
Nina Menard, Ecology
Kim Welsch, Ecology
Cheryl Whalen, Ecology
USDOE-RL Correspondence Control
Environmental Portal
Hanford Operating Record

cc: Stuart Harris, CTUIR
Gabriel Bohnee, NPT
Russell Jim, YN
Steve Hudson, HAB
Administrative Record: 200 Area ✓
NWP Central File
NWP Reader File