



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10 HANFORD PROJECT OFFICE  
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0060563

August 20, 2003

Mr. Harry Bell  
U.S. Department of Energy  
PO Box 550, A6-33  
Richland, WA 99352

RECEIVED  
OCT 21 2003  
EDMC

Re: Revised Removal Action Report for the 233-S Plutonium Concentration Facility

Dear Mr. Bell:

The U.S. Environmental Protection Agency (EPA) has reviewed the Removal Action Report for the 233-S Plutonium Concentration Facility (0233S-RAR-G0002, Revision 3, Draft A). The EPA comments on this document are enclosed. The EPA looks forward to working with the U.S. Department of Energy to revise the document and continue the progress of this removal action.

If you have any questions, please call me at 509 376-8665.

Sincerely,

Craig Cameron  
200 Area Project Manager

Enclosure

cc: Oly Serrano, FHI  
Administrative Record: REDOX 233-S Pu Concentration Facility D & D

**EPA COMMENTS ON 233-S PU CONCENTRATION FACILITY REMOVAL  
ACTION REPORT DRAFT (0233S-RAR-G0002, REVISION 3, DRAFT A)**

#	Section; page	Comment Type/Comment
<i>General</i>		
G-1	Main text of RAR	Too much has been removed from the previous version. Some of the sections still require some discussion, even though most of the details are in the various appendices. There needs to be more discussion of the work that has already been done and the way previous versions addressed this work. A few historical discussions interspersed would be helpful. Specific comments will provide examples of areas where such discussion would be helpful.
G-2	Main text of RAR	Need to explain that besides the Waste Management Plan, the Sampling and Analysis Plan also provides for detailed characterization plans to be developed that are then approved by EPA. For example, such a plan was approved for characterization of the ventilation system and roof as well as for the process hood.
<i>Specific</i>		
1	1.0; 1-1; first sentence	Need to correct the square miles and equivalent metric values to reflect the actual 586 square miles.
2	1.0; 1-1; second to last paragraph	Would be a good spot to talk about the beginning of this project with reference to the Action Memo, earlier versions of the RAR (with comment that they are available for viewing in the Administrative Record for REDOX 233-S Pu Concentration Facility), etc., rather than "decommissioning activities."
3	1.2; 1-2; first paragraph in section, last sentence	Realizing that this text was already in the document before this draft revision, this language about the Action Memo is too weak. The Action Memo is the decision document that selected the alternative, not verified it. It also lists the ARARs that apply to this non-time critical removal action. Please revise to reflect this.
4	1.2; 1-2, second paragraph, last sentence	Rewrite the end of the sentence to read, "...disposed of or stored at appropriate waste storage locations or facilities until final disposal."
5	1.2; 1-2, last paragraph on page, second sentence	It would be more accurate to write that the agreement was documented in a letter to the Administrative Record, than to call the letter an Administrative Record.
6	1.2; 1-2, last sentence	There should be some clarification that this is the end state under this removal action or D & D project. It won't necessarily be the end state under the remedial action for the REDOX area.
7	2.1.6; 2-6	This section is pretty short. Please leave in the part about the characterization effort from the previous version. Need to at least mention the survey and swipes that will need to be done as part of a final status characterization plan that will be approved by EPA prior to implementation. Don't wait until the closeout report to involve EPA. There needs to be some discussion in this section of the regulations or guidance that will drive the levels of

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		contamination and radiation left at the surface of the site.  Also, the REDOX Surveillance and Maintenance Plan will need to be revised and approved by DOE and concurred with by EPA so that the slab and surrounding area are covered.
8	2.3.1.1; 2-7	Wasn't the fire hazard evaluation an appendix of this document in previous versions? Shouldn't you refer to it as such?
9	2.3.1.2; 2-7, second to the last paragraph and Section 6.	Why are there DOE and DOE-RL references for the same Notice of Construction?
10	4.0; 4-10, second sentence	Believe you mean to say "demolition" instead of "decommissioning."
11	4.1; 4-10	Need to reference the Air Monitoring Plan and possibly mention the Continuous Air Monitor that will be used onsite during demolition.
12	4.1; 4-10, second paragraph, first sentence	Need to back up the statement of compliance with a reference to the conversation with Health. Add to references section.
13	4.1; 4-10, last paragraph	Please explain why the project does not need to calculate the Maximally Exposed Individual (using LIGO as the location) now. Is it because there won't be a stack to regulate the emissions from?
14	4.2.1; 4-11	Put the references to the regulations back in the document. Make sure you include a reference to RCRA hazardous waste designation regulations.
15	4.2.1; 4-11 or 12	On the revised Rev. 3A copy provided after the last briefing, what is the radiological inventory control program mentioned in this section?
16	4.2.2; 4-11	Are you sure you want to eliminate the section on treatment in case you have to treat something?
17	4.2.2; 4-11	Why was the Area of Contamination (AOC) removed from the discussion? The AOC needs to be defined somewhere and distinguished from "onsite." It is understood that the areas that are considered "onsite" will be slightly expanded to allow for ERDF container staging areas north of the REDOX area fence line.
18	4.2.4; 4-11	Knowing the schedule for TRU waste shipments from the Hanford Site to WIPP, the following language about the shipping schedule should be added: "All TRU waste originating from 233-S (whether currently stored or newly generated) will be shipped to WIPP according to the DOE's schedule, but in no case greater than 24 months of final generation (demolition)."
19	4.2.4; 4-11	Add a statement that EPA will need to approve offsite shipments.
20	4.3.1; 4-11/12	There needs to be more detail in this section. Looks like the section that will be added in from the Rev. 3 draft provided at the last meeting will address much of what is needed. However, instead of waiting for release criteria from the applicable operable

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		unit, these criteria should be spelled out in this document. The criteria would likely be based on worker safety/protection of groundwater and how a waste site is stabilized for later activities including proper controls and postings.
21	5.1; 5-13	The schedule and cost information for the remainder of the project needs to be summarized in this section. More detail can be provided in an appendix that is referenced.
22	5.?.; 5-13	<p>You really should leave the section on change management in the document as it is part of the Action Memo and is related to Tri-Party Agreement compliance. Of course, you can clean out references to BHI procedures.</p> <p>The proposed addition to the document in the handout from the last meeting (Section 5.5) makes no sense whatsoever. Let's get serious, there is not going to be a need for a proposed plan or any change that large. Remove this addition if it was added.</p>
23	5.3 to 5.5; 5-13/14	These sections have really been butchered. They need to have more explanation than "see the appendix." See comment # 7 when deciding what to put in Section 5.5 to fill it out.
24	Appendix B	The demolition plan and write up seems fine.
25	B4.3; third to the last bullet	What is the tank that is mentioned? Will it be removed before demolition?
26	B4.3; last paragraph	Does the last sentence mean that the last 6 inches of wall will be trimmed off of the slab?
27	B5.0; last sentence	Please specify how the site will be posted.
28	E2.3; E-4, second sentence	Need to replace "hazardous substances" with "hazardous waste."
29	E5.0; E-5, second paragraph	Not certain what you are trying to say here. Please clarify.
30	E7.0; E-6, third sentence	Should include a brief description of waste packaging and transport from WRAP to WIPP.
31	Figure E-2; E-7	Understand that a revised map showing onsite areas has just been added to the Waste Management Plan (this appendix). The new map meets with our approval. However, somewhere in the text you need to define what areas are within the Area of Contamination.
32	E7.3; #5	Need to indicate (maybe in another numbered item) the general packaging necessary for transportation and acceptance into WIPP.
33	E9.0; E-11, second paragraph, first sentence	This sentence is not written clearly. It makes it sound like ERDF can accept some TRU level waste.
34	E9.0; E-11, second paragraph, first sentence	Add a sentence after this that reads, "All TRU waste originating from 233-S (whether currently stored or newly generated) will be shipped to WIPP according to the DOE's schedule, but in no case greater than 24 months of final generation (demolition)."

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35	E9.0; E-11, second to last paragraph, last sentence	You should specify that the demolition debris that would go to this landfill (as opposed to ERDF) would have to be free released.
		<i>Typo</i>
T-1	2.1; 2-4; second sentence	Need a "d" on the end of "reduce."
T-2	2.1.3; 2-5, first sentence after bullets	Extra space between "in-depth" and "planning."
T-3	2.1.3; 2-5, third paragraph from the bottom	The reference to the Sampling and Analysis Plan should have the year "2001."
T-4	3.1; 3-10, first paragraph, second sentence	Need to add the word "to" after "not."
T-5	B1.0; first paragraph, last sentence	"Contaminates" should be "contaminants."
T-6	B2.2; last sentence	"Began" should be "begun."
T-7	E7.1; E-6, line after bullets	This line is a repeat of part of first sentence.