



Department of Energy
Richland Operations Office
P.O. Box 550
Richland, Washington 99352

0057084

02-RCA-0280

APR 11 2002

Mr. John Iani, Regional Administrator
Region 10
Environmental Protection Agency
1200 Sixth Avenue
Seattle, Washington 98101

RECEIVED
APR 30 2002
EDMC

Dear Mr. Iani:

REQUEST FOR AN EXTENSION TO THE ONE YEAR TIME LIMIT FOR THE STORAGE
OF POLYCHLORINATED BIPHENYL WASTE

The U.S. Department of Energy, Richland Operations Office (RL) is requesting an extension to the one-year time limit for the storage of polychlorinated biphenyl waste as allowed by 40 CFR 761.65. The waste is currently being stored at the Hanford Site in the 305B Building, which is a Resource Conservation and Recovery Act-permitted storage unit.

The waste for which this extension is requested is one-liter of non-radioactive liquid laboratory waste resulting from research and development work as described in 40 CFR 761.30 (j). The liquid waste is expired laboratory standards containing polychlorinated biphenyl and constituents regulated as hazardous waste by 40 CFR 261, including pentachlorophenol that carries the F027 waste code. The waste was removed from service on May 11, 2001.

RL has been unable to dispose of the waste because there is no facility within the United States that is permitted to treat hazardous waste that carries the F027 code. Additionally, the waste cannot be exported from the United States to other countries for disposal because the waste contains polychlorinated biphenyl.

If you have any questions, please contact Ellen Mattlin of my staff, on (509) 376-2385, or Theresa Aldridge, Laboratory Operations Division, on (509) 372-4508.

Sincerely,

Joel Hebdon, Director
Regulatory Compliance and Analysis Division

LOD:TLA

cc: M. Anderson-Moore, Ecology
D. Bartus, EPA Region 10
D. Duncan, EPA Region 10
D. Einan, EPA
R. Gay, CTUIR
R. Ji, YIN
P. Sobotta, NPT
TPA Administrative Record, H6-03

REVIEW COMMENT RECORD (RCR)	1. Date April 8, 2002	2. Review No.
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15. Document Number(s)/Title(s) DOE/RL-2001-66/ 200-LW-1 300 Area Chemical Laboratory Waste Group Operable Unit RI/FS Work Plan	6. Program/Project/ Building Number	7. Reviewer Brenda K. Jentzen	8. Organization/Group Washington State Department of Ecology	9. Location/Phone 1315 W. 4 th Ave. Kennewick, WA (509) 736 – 5707
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17. Comment Submittal Approval: 10. Agreement with indicated comment disposition(s) 11. CLOSED

Organization Manager (Optional)

Date

Reviewer/Point of Contact

Date

Reviewer/Point of Contact

Author/Originator

Author/Originator

12. Item	13. Comment(s)/Discrepancy(s) (Provide technical justification for the comment and detailed recommendation of the action required to correct/ resolve the discrepancy/problem indicated.)	14. Hold Point	15. Disposition (Provide justification if NOT accepted.)	16. Status
1.	DQO Pg. 1-9 ¶ 1 st The statement regarding the 200-W-21 dump station and the 200-W-82 product piping is not an acceptable resolution of a concern raised during the DQO decision-maker interview. The adjacent sentences do not support each other: how can things that “differ in construction and contamination release” be supported by the same conceptual contaminant distribution model? Additional sampling “following the issuance of the ROD” is not an acceptable resolution to a deficient conceptual model. Ecology suggests that DOE add sampling of these two sites to the work plan.			

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2.	Generally, the SAP does not have enough detail about where and when the COC are being sampled. The SAP also does not adequately support that the sampling at high concentrations of radionuclides will necessarily be the area that high concentrations of chemical contaminate will be located.			
3.	Cover Revise Title as: 200-LW-1 300 Area and 200-LW-2 200 Area Chemical Laboratory Waste Group Operable Units RI/FS Work Plan This RI/FS work plan addresses both operable units.			
4.	Change footer designation of work plan scope, consistent with comments above.			
5.	Pg. ES-1 ¶ 1st This is a <u>global comment</u> , but this page & paragraph are the first example of its application. Change "for the 200-LW-1 Chemical Laboratory Waste Group Operable Unit (OU)." to "for the 200-LW-1 Chemical Laboratory Waste Group Operable Unit (OU) and 200-LW-2 Chemical Laboratory Waste Group OU." This RI/FS work plan addresses both operable units.			
6.	Pg. ES-1 ¶ 3 rd Delete paragraph. Replace with: "The Tri-Parties (U.S. Department of Energy, the Washington State			

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	<p>Department of Ecology, and the U.S. Environmental Protection Agency) have agreed on an implementation approach for remedial investigation/feasibility studies in the Hanford 200 Area. The Implementation Plan addressed more than 800 waste sites that were grouped into 23 process-based OUs, which in turn were grouped into 9 major waste categories (e.g., process waste, landfills, cooling water). This categorization facilitates the use of an analogous sites approach: combining into groups waste sites with similar process histories, structures, and contaminants; and then choosing one or more representative sites for comprehensive field investigations. Findings from the field sampling of representative sites are then used to make remedial decisions for all of the waste sites in the waste group. The scope of this work plan addresses two OUs, but most of the representative sites are in the 200-LW-1 OU.”</p>			
7.	<p>Pg. 1-2 ¶ 1st Another example of the global comment. Change: “for 200-LW-1” to “for this work plan”</p>			
8.	<p>Pg. 3-13 ¶ 3.4.2 The first bullet is inaccurate as ingestion is a separate pathway from inhalation. The four routes of entry are inhalation, ingestion, absorption, and contact.</p>			
9.	<p>Pg. 3-15 ¶ last The statement that the preliminary list of COPC’s, the excluded analytes and the rationale for exclusion are presented in the DQO summary report (BHI 2001) leads one to reference the DQO.</p>			

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	However, the DQO does not adequately explain the reasoning behind the exclusion of many of the chemicals. The DQO makes statements such as: This chemical is unlikely to be present in toxic concentrations. This commercial chemical is sodium silicate and organic complexants., etc. How are these statements justifications? What are the references for the number of chemicals that are stated in the DQO to have been used in small amounts?			
10.	Pg. 3-26 through Pg.3-28 These models work well for a worst case scenario. They are not appropriate models for understanding the extent and magnitude of the contamination. The models do not accurately describe lateral spread which limits the program of investigation.			
11.	Pg. 4-1,4-2 Page 1-9 of the DQO Summary Report, Draft A, states that "The final selection of the waste sites . . . will consider critical data needs of other Groundwater/Vadose Zone core projects (e.g., the River Protection Project or the Science and Technology Project)." However, there is no documentation in Section 4 of the work plan, that any other core projects were consulted. What core projects were consulted (and when – provide dates), and what specific data needs were incorporated into the work plan?			
12.	Pg. 4-1 ¶ 3 rd			

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	What is the basis or reference for this statement: Contaminants released through a small crib would likely impact the soil immediately beneath the crib with minimal lateral spread; Clarify how the amount of lateral spread will be determined.			
13.	Pg. 4-3 ¶ 4.1.4 2 nd The statement because the 216-T-28 Crib and the 216-S-20 Crib are small point-source-type sites, the lateral extent of contamination within the site boundaries is not considered necessary for remedial decision making. What is the reference that justifies this statement?			
14.	Pg. 4-4 ¶ 4.2 2 nd Provide more clarity as to when you will sample at other depths than the 15 and 25 feet intervals. Sampling at these two depths may not be adequate. Who makes this decision?			
15.	4-5 ¶ 4.2.2 2 nd Clarify that the sampling generally will begin at the first sign of radiological contamination. This practice assumes that chemical contamination follows radiation contamination? Justify			
16.	Pg. 4-6 ¶ 4.2.3 The statement that all samples from the boreholes will be field screened for evidence of radionuclide needs clarification. What evidence is available to support that the non-radiological COC will	X		

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	be located at the highest concentration with the radiological COC?			
17.	Pg. Table Appendix -24, 25 Discuss with Ecology the reasoning behind the analytical priorities. What criteria were used to set the priorities? (e.g. VOA is ninth on the list and can be analyzed with only 4 ounces of sample.)	X		
18.	Pg. A-27 ¶ A.3.3.1 2 nd Figures A-6 through A-9 illustrates hypothetical sampling intervals in boreholes. What criteria are used to decide when to take actual samples? See comment #3.	X		
19.	Pg. A 28-29 ¶ A.3.4 Clarify how the spectral gamma-ray logging is the appropriate screening tool for alpha and beta emitting radionuclides?			
20.	Pg. A 28 ¶ A.3.3.3 Who makes the decision on chemical (non-radiological) contaminants that are to be sampled? Will samples for the full suite of chemical (non-radiological) contaminants of concern always be taken?			