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To: HANFORD-INFO@LISTSERV.WA.GOV

EDMC

Subject: CORRECTED: TPA: Public Comment Period on 200 Area Non-Tank Farm Waste Sites and Groundwater Cleanup Milestones

Proposed Tri-Party Agreement Changes to the 200 Area Non-Tank Farm Waste Site and Groundwater Remediation Milestones (M-15)

The U. S. Department of Energy (USDOE), the Washington State Department of Ecology (Ecology), and the U.S. Environmental Protection Agency (EPA) want your input on proposed changes to the Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement). The proposed changes:

- *provide for additional waste site and groundwater characterization to be performed prior to making final cleanup decisions*
- *include the addition of a milestone to develop a Treatability Test Plan for identifying potential technologies to address deep vadose zone contaminants*
- *require within 180 days of Record of Decision (ROD) signature, or an alternative period designated in the ROD, a Remedial Design/Remedial Action (RD/RA) work plan, including a schedule with a milestone change package, be submitted for lead regulatory agency review and approval.*

Background

The Hanford Site is a former weapons-production complex managed by the DOE. The 586 square mile site, located in southeastern Washington, produced about 60 percent of the United State's plutonium from the mid-1940s to the late 1980s to support national defense. The Central Plateau (also referred to as the 200 Area) covers 72 square miles in the middle of the Hanford Site. The legacy waste and contaminated materials from the Site's defense mission remain on the Central Plateau in facilities, underground tanks, waste sites and structures.

There are an estimated 884 waste sites on the Central Plateau contaminated with radionuclide and hazardous chemicals. Many of these waste sites received liquids from processing operations that occurred in the 200 Area. Major radioactive hazards include plutonium, strontium-90, cesium-137, iodine-129 and technetium-99. Chemical hazards include metals, acids, and carbon tetrachloride. Also included as waste sites are radioactive and non-radioactive landfills and dumps, septic tanks, drain fields, pits, pipeline and tanks.

What we are proposing

Based on tribal and stakeholder input and lessons learned, the TPA Agencies (Parties) re-evaluated their approach to obtaining characterization data that support cleanup decisions in the Central Plateau. They grouped waste sites into Conceptual Model Groups for the purpose of identifying additional characterization needs. One of the Conceptual Model Groups identified was wastes sites with shallow contamination. There are approximately 350 (40% of the total) sites for which current information is sufficient to make cleanup

decisions and these sites fit within the conceptual model for shallow contamination. The majority of these sites are likely to be good candidates for remove, treat and dispose remedies.

These activities led the Parties to propose changes to the milestones for completing the CERCLA Remedial Investigation/Feasibility Study (RI/FS) or RCRA Facility Investigation/Corrective Measures Study (RFI/CMS) process for 200 Area non-tank farm operable units.

The proposed milestone changes will:

- Extend the date for two major milestones M-015-00 and M-015-00C, by three years (from 12/31/2008 to 12/31/2011), add 11 new interim milestones, and modify 4 other M-015 interim milestones to allow time to obtain additional characterization data.
- Establish a milestone for two newly created operable units (OUs), 200-MG-1 and 200-MG-2, which will move the 350 shallow contamination waste sites from their current OUs into the newly created OUs. A third new OU will be created for the 200 BC Cribs and Trenches.
- Establish 6 new M-013 interim milestones identifying dates to submit documents, including a plan for all required supplemental characterization.
- Add a milestone to develop a Treatability Test Plan for identifying potential technologies to address the hazards presented by deep vadose zone contaminants.
- Revise language to require that within 180 days of signing a Record of Decision (ROD), or an alternative period identified in the ROD, a remedial design/remedial action work plan, including a schedule with a milestone change package, be submitted to the lead regulatory agency for review and approval.

The cleanup completion date for the overall Central Plateau non-tank farm units remains unchanged (September 30, 2024).

The proposed milestone changes modify the sequencing of when characterization data is gathered, requiring more site characterization to be completed prior to making cleanup decisions as opposed to relying heavily on confirmatory sampling normally performed after cleanup decisions are made. Conducting additional characterization prior to cleanup decision-making provides the opportunity to better understand the potential impact waste sites or existing groundwater plumes pose to the environment. This approach is intended to provide greater confidence that cleanup decisions are protective of human health and the environment.

How you can become involved

A 45-day public comment period on the proposed changes will be held from **October 23 through December 7, 2006**. The agencies would like your feedback on the changes proposed and will consider all comments before the changes are made final. No public meeting is scheduled at this time. To request a public meeting call Karen Lutz, DOE (509-376-4766). Questions on the draft change package can be directed to any of the agency representatives: Briant Charboneau, DOE (509-373-6137) Briant_L_Charboneau@rl.gov, John Price, Ecology (509-372-7921) jpri461@ecy.wa.gov, Craig Cameron, EPA (509-376-8665) cameron.craig@epa.gov. Please submit comments to:

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To obtain a copy of the proposed changes call the Hanford Cleanup Line 1-800-321-2008.
The proposed changes can be viewed on line at <http://www.hanford.gov/?page=110&parent=91>

The documents are also available for review at the
Public Information Repositories listed below.

HANFORD PUBLIC INFORMATION REPOSITORY LOCATIONS

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Portland State University
Branford Price Millar Library
1875 S.W. Park Ave.
Attn: Don Frank (503) 725-4709

Seattle

University of Washington
Suzzallo Library
Government Publications Division
Attn: Eleanor Chase (206) 543-4664

Richland

U.S. Department of Energy Public Reading Room
Washington State University, Tri-Cities
Consolidated Information Center, Room 101-L
2770 University Drive
Attn: Janice Parthree (509) 372-7443

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Gonzaga University
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Attn: Linda Pierce (509) 323-3834

Administrative Record and Public Information Repository:
Address: 2440 Stevens Center Place, Room 1101, Richland, WA
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