



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10 HANFORD/INL PROJECT OFFICE  
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December 29, 2006

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Richland Operations Office  
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PO Box 550, A3-04  
Richland, Washington 99352

RECEIVED  
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EDMC

Re: EPA Comments on *DOE/RL-2004-77, Draft A, Removal Action Work Plan #1 for the 300 Area Facilities, Revision 1*

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Dear Mr. Franco:

Enclosed you will find preliminary comments from the U.S. Environmental Protection Agency (EPA) on the subject document. In addition to these specific comments, there are three items that will need to be resolved in the work plan.

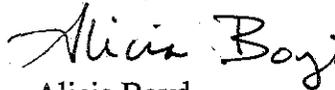
- 1) Previous discussions had led the EPA to believe that this revision would be the single work plan that all D4 activities would fall under for the 300 Area. Consolidation in this manner should cause less confusion. Please let EPA know if the facilities that fall under the authority granted by *Action Memorandum #2 For the 300 Area Facilities* will or will not be added to this work plan.
- 2) The Air Monitoring Section should be updated to include all substantive requirements that pertain to point source emissions in the 300 Area. It was anticipated that the currently licensed facilities would fall under CERCLA authority and be removed from the Washington State Department of Health Approval Orders and the Hanford Site Operating Permit after this version of the work plan was approved and upon physical start of the removal action. Until these requirements are included in an EPA-approved air monitoring plan, the existing state requirements are still in force. I do not believe that the Department of Energy (DOE) will find it advantageous to perform the removal action while these permits are still in effect.
- 3) The action memoranda authorize stabilization of sites on a temporary basis until waste site remediation occurs, but not permanent backfilling of excavations. Although the action memoranda mention characterization to determine if the removal action objectives have been met, "closing out" facilities prior to backfilling is not addressed in the *300 Area D4 Waste Sampling and Analysis Plan (DOE/RL-2004-84, Rev. 1)*. DOE would benefit from working with EPA

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to develop and agree to a method of sampling locations where removal is complete and remediation is not required. This process should be the same or comparable to the closeout verification packages that are required by the remedial action work plans, and will support the development of final Records of Decision. EPA will add this topic to the agenda of the next Unit Managers Meeting scheduled for January 11<sup>th</sup>. The removal action work plan may be an appropriate place to document this closeout sampling strategy. EPA would discourage DOE from backfilling any deep excavations (such as the former site of the 305 Building) until a sampling strategy is agreed upon and documented.

Many of the revisions to the document will be significant enough to necessitate another review of the draft once comments have been addressed. If EPA is involved as comment resolution is occurring, a subsequent review of the document will be completed in a much shorter period of time (one to two weeks). Feel free to contact me at 376-4919 for any clarifications.

Sincerely,



Alicia Boyd

300 Area Project Manager

Enclosure

cc: Kevin Bazzell  
Rudy Guercia, DOE  
Rick Bond, Ecology  
Donna Yasek, WCH  
✓ Administrative Record: 300 Area Facilities  
H-0-7

cc without Enclosure:  
Gail Laws, DOH  
Doug Hendrickson, Ecology

**EPA Comments on DOE/RL-2004-77, Draft A,  
Removal Action Work Plan #1 For The 300 Area Facilities**

1. Perhaps the name should be changed (delete the #1) since this version is supposed to replace RAWP #1, #2, and cover buildings under Action Memo #3. An explanation of this coverage should be clarified in the introduction. (The current intro is a bit hard to understand.)
2. Table 1-1 should have, for each building demolished, information on what authority the D4 took place under (AM #1, AM #2, DOE separate authority). This information should also extend to active facilities if they are listed in a particular AM.
3. Section 2.6, Site Closure, 1<sup>st</sup> two paragraphs. Some form of verification sampling will be needed, not just field sampling and visual inspection. This topic will be discussed at the January Unit Manager's Meeting.
4. Section 4.2.3, Waste Handling. Please add the following footnote to the list of existing offsite determinations. "EPA will notify DOE in writing of any change in the offsite determination of these listed facilities."
5. Section 4.2.3.4, Solid Waste section, last sentence. Please add the footnote regarding "de minimis concentration" from Action Memo #3. **"De minimis is not a CERCLA defined term, but is used to convey the notion that there are some items with very low levels of CERCLA hazardous substances where the CERCLA process does not apply."**
6. Section 4.2.3.4, Asbestos section. The second paragraph of the asbestos section should be modified to include new text: **"All friable and most nonfriable ACMs and presumed ACMs will be removed prior to demolition of the area. Trained Asbestos certified workers will be used as well as oversight provided by a competent person trained in Asbestos regulations. This competent person must be on site at all times that work is being performed on ACMs."**
7. Section 4.3.1, next to last paragraph. Wording is currently unclear. The Hanford Site Air Operating Permit cannot be considered obsolete until the substantive regulatory requirements associated with those facilities is included in the work plan (which is not currently the case). The Washington State Department of Health Licenses, and Hanford Air Operating Permits are in effect and current until the removal action work plan includes all substantive requirements.
8. Section 4.3.2, first paragraph, last sentence. How does one differentiate between uncontaminated and contaminated stormwater? Some explanation of when stormwater will be sampled is needed (or under what circumstances stormwater would be considered contaminated).
9. Section 4.3.2, last paragraph. I recall submitting this comment on a similar document, may have been the RAWP #3. Please describe in plain terms why the discharges did not meet the applicability requirements of the NPDES permit (I believe it had to do with discharges not reaches particular drains or the river).

10. Section 5.1, last paragraph. The schedule should support completion of the entire M-94 series of milestones (00, 03, 06-09), not just milestone M-94-00.
11. Reference section. All Action Memos (#1, #2, #3) should be listed with DOE as the author, not EPA.
12. Air Monitoring Section B.2, Airborne Source Information, 2<sup>nd</sup> paragraph, and Table B-1. Please remove text discussing the possibility of not performing emission estimates. If, after characterization, facilities will be deactivated, decontaminated, decommissioned and demolished unless authority other than CERCLA, no PTE needs to be calculated and submitted to EPA. If a facility is demolished under CERCLA, a PTE must be submitted to EPA. Some smaller facilities, such as boiler annexes or construction trailers with biological contamination, may be grouped for emissions calculations, in order to limit the number of calculations performed.
13. Related to comment #12. The air monitoring plan should include a summary table of potential to emit calculations performed up to that date, grouped by calendar year based on the time the emission potential existed. As new PTE calculations are accepted, the table should be updated to reflect the additional calculations. These updates can be documented in the UMM minutes.
14. Air Monitoring Section B.2, Airborne Source Information, 5<sup>th</sup> paragraph. Please substitute the last sentence "The additional monitoring requirements... . . . in UMM minutes." with the following: "Any additions or changes to this work plan will be documented in UMM minutes."
15. Air Monitoring Section B.3, 2<sup>nd</sup> bullet. Modify the sentence to include any contaminated debris or soils that will be inactive for more than 24 hours.
16. Air Monitoring Section B.4, 1<sup>st</sup> paragraph, 1<sup>st</sup> sentence. Please add the following text "in accordance with 40 CFR 61, Appendix B, Method 114(3) and WAC 246-247-075(3)."
17. Air Monitoring Section B.5, 2<sup>nd</sup> paragraph, last sentence. The RAWP and associated Air Monitoring Section will not become the air emissions approval for the facility until after substantive requirements of WDOH Approval Orders and the Hanford Site Operating Permit have been included in an approved update. Until that date, any CERCLA D4 activities will still be subject to the existing State of Washington permits and licenses.
18. Air Monitoring Section B.5.1, Radiological Counting Facility. Please ensure that all information in the approved *Radiological Counting Facility Air Monitoring Plan* is included in this section.
19. Air Monitoring Section B.6, References. Please include the *Radiological Counting Facility Air Monitoring Plan*.