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Ms. Jane A. Hedges, Program Manager
Nuclear Waste Program
State of Washington
Department of Ecology
3100 Port of Benton
Richland, Washington 99354

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Dear Ms. Hedges:

COMMENT RESPONSE FOR THE FEASIBILITY STUDY FOR 200-CS-1 CHEMICAL SEWER GROUP OPERABLE UNIT, DOE/RL-2005-63, DRAFT A

- References: (1) RL ltr. to J. A. Hedges, Ecology, from K. A. Klein, "Plan for Revision of Feasibility Study for the 200-CS-1 Chemical Sewer Group Operable Unit, DOE/RL-2005-63, Draft A and Proposed Plan for the 200-CS-1 Chemical Sewer Operable Unit, DOE/RL-2005-64, Draft A," (06-AMCP-0278) dtd. August 31, 2006.
- (2) Ecology ltr. to L. D. Romine, RL, from J. B. Price, "DOE Letter 06-AMCP-0254, 'Compliance with Interim Milestone M-015-39C for 200-CS-1 Operable Unit Feasibility Study,'" dtd. July 31, 2006.
- (3) Ecology ltr. to L. D. Romine, RL, from J. B. Price, "The Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) Milestone M-015-39C: 200-CS-1 Chemical Sewer Group Feasibility Study (FS), and Milestone M-020-39: 216-S-10 Pond and Ditch Closure/Post-Closure Plans," dtd. July 3, 2006.

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The purpose of this letter is to transmit a summary of responses to comments provided by the State of Washington Department of Ecology (Ecology) on July 3, 2006, for the 200-CS-1 Operable Unit (OU) Feasibility Study (FS), Reference (3). It also proposes a recommended path forward for revising the document by summarizing key actions to be taken and inviting Ecology to participate in a one-day work shop tentatively scheduled to be held during the week of February 19, 2007, to conclude the comment response phase and begin focusing on the Draft B revision of the FS and Proposed Plan (PP).

On July 3, 2006, the U.S. Department of Energy, Richland Operations Office (RL) received Ecology's comments on the Draft A, 200-CS-1 Chemical Sewer Group OU FS. Subsequently, Ecology requested RL to submit a plan to update the FS, Reference (2). RL submitted a plan on August 31, 2006, Reference (1) that included actions to hold comment resolution workshops, submit a detailed response to Ecology comments, and deliver a Draft B FS and PP by September 28, 2007.

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The following recommended path forward is based on Ecology comments on the 200-CS-1 FS, lessons-learned on other recent documents, risk assessments currently underway and U.S. Environmental Protection Agency (EPA) CERCLA guidance. Proposed actions include:

- Discuss the risk assessment approach and technical modifications to the FS with Ecology regulators.
- Modify the extended risk analysis to better reflect having followed EPA guidance.
- For improved readability, revise the baseline risk assessment summary in the FS so that information needed to support conclusions is included in the body of the FS and detailed supplemental information is relegated to an appendix.
- Reduce redundancy of waste site descriptions.
- Revise the uncertainty and risk communication discussions to improve how the information supports the remedy evaluation and alternatives analyses.
- Remove sections of the extended analysis where the 95 percent Upper Confidence Levels were inappropriately used to supplement the screening performed in the Remedial Investigation Report.
- Revise the evaluation of the "protection of groundwater" pathway utilizing the STOMP fate and transport code.
- Move alternative exposure scenarios provided for information purposes (i.e., unrestricted land-use, intruder, and Native American scenarios) to a separate document or an appendix to the FS. This change should result in a more clear and concise presentation of the primary exposure scenario in the FS.

From September 2006 through mid November 2006, comment clarification meetings were conducted between RL and Ecology. The attached Summary Response to July 3, 2006, Ecology Comments on 200-CS-1 OU FS Draft A, identifies:

- 276 comments to be incorporated, as clarified, in the Draft B FS.
- 46 comments that directly relate to policy or plateau-wide issues
- 8 comments for which specific comment responses have been offered.

In support of RL's intent to provide a revision of the FS and PP, it is believed that the comment response phase should be concluded at a one-day work shop with Ecology to be held during the week of February 19, 2007. Any subsequent workshops would be intended to further support and move the development of Draft B forward. The purpose of the workshop is two-fold. The first is to present for discussion the path forward for the development of Draft B of the FS and PP. The second is to conclude the comment response with feedback from Ecology on this comment response package.

At this time, the deliverable of the 200-CS-1 FS and PP, Draft Bs, remain on schedule to be submitted to Ecology by the target date of September 28, 2007.

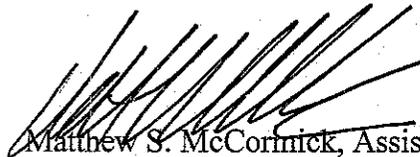
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Ms. Jane A. Hedges
07-AMCP-0084

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If you have any questions, please contact me, or your staff may contact, Briant Charboneau, of my staff, on (509) 373-6137.

Sincerely,



Matthew S. McCormick, Assistant Manager
for the Central Plateau

AMCP:BLF

Attachment

cc w/attach:

G. Bohnee, NPT
C. E. Cameron, EPA
N. Ceto, EPA
L. J. Cusack, Ecology
S. Harris, CTUIR
R. Jim, YN
T. M. Martin, HAB
K. Niles, ODOE
J. B. Price, Ecology
J. A. Vanni, Ecology
Administrative Record
Environmental Portal

cc w/o attach:

B. A. Austin, FHI
R. C. Brunke, FHI
L. R. Fitch, FHI
B. H. Ford, FHI
R. E. Piippo, FHI
M. E. Todd-Robertson, FHI
J. G. Vance, FFS

ATTACHMENT

**Summary Response to July 3, 2006, Ecology Comments on
200-CS-1 Operable Unit Feasibility Study Draft A**

Consisting of 4 pages, including this cover page

Summary Response to July 3, 2006, Ecology Comments on
200-CS-1 Operable Unit Feasibility Study Draft A.

Specific Comments Responses Offered		
No.	Section/Page	Comment/Preliminary Response
21	xiii, general	<p>Please clarify to state where the crosswalk table between RCRA TSD Closure Plan requirements and CERCLA documentation is located. If none, develop table.</p> <p>Ecology clarification meeting (10/31/06) – Jean Vanni asked that the 200 Area Implementation Plan be summarized. FH indicated that there was a difference in whether we rely on CERCLA documents or if a stand-alone closure plan was going to be used. It was agreed that if this action is going to be addressed solely by CERCLA documents, a crosswalk would be made. If a separate closure plan is going to be used, a crosswalk is not necessary.</p> <p>Preliminary Response - At this time, stand-alone TSD closure plans have been submitted, and a crosswalk is not planned.</p>
35	1-3, line 37	<p>Because the groundwater status has not been evaluated, “clean closure” as proposed is without basis.</p> <p>Preliminary Response – The submitted TSD closure plans sufficiently address this comment.</p>
50	2-2, line 25	<p>Insert text at end of paragraph: “Waste inventories for the 200-CS-1 OU waste sites are not well documented because there were no known requirements for sampling of nonradioactive contaminants.”</p> <p>Preliminary Response – RL proposes to insert this sentence instead; “Waste inventories for the 200-CS-1 OU waste sites are not well documented because Hanford Site practices at the time the sites were operated required only routine radioactive monitoring/surveys.”</p>

284	8-3, line 9	<p>Delete this section. Ecology does not anticipate the use of the plug-in approach for this operable unit.</p> <p>Preliminary Response - RL acknowledges that for the 200-CS-1 OU specifically, it is unlikely that additional waste sites would be appropriate plug-in candidates. However, the flexibility provided by this approach is still valid and needs to be preserved.</p>
287	8-6, lines 7-41	<p>Clean closure may or may not be accepted, depends on determination of whether or not any COCs will reach groundwater from the -A-29, S-10 or -B-63 units. The units are subject to WAC-650(6) regs (which lead to WAC-610(7)(8)(9) & (10).</p> <p>Preliminary Response – The sections discussing soil screening and risk assessment will be revised. By COCs, RL believes Ecology meant 'RCRA hazardous waste constituents, which the TSD units managed.' The ARAR WAC-173-303-610 is incorporated by reference WAC-173-303-650(6).</p>
288	8-2, line 8	<p>Section 8.1.4 - Rewrite this section to reflect confirmatory sampling being a condition of the permit chapter for closure of the TSDs.</p> <p>Preliminary Response -The sampling information, consistent with the approved closure plan permit conditions, will be placed in the administrative record to support the 200-CS-1 OU record of decision.</p>
290	8-3, line 9	<p>Section 8.2.1 - it appears that the plug-in approach will not be required due to the small number of waste sites in this operable unit. Also, it is unlikely that other waste sites would "plug-in" to the conceptual models for these types of waste sites (chemical sewers/ditches). Also, it is unlikely that the plug-in approach would be used, given the regulatory pathway (closure of all of the waste sites). Therefore, delete this subsection.</p> <p>Preliminary Response – RL acknowledges that for the 200-CS-1 OU specifically, it is unlikely that additional waste sites would be appropriate plug-in candidates. However, the flexibility provided by this approach is still valid and needs to be preserved.</p>

295	8-5, Section 8.2.1.3	<p>Delete this section. Ecology does not anticipate use of “plug-in” approach. Ecology anticipates permit requirement for submittal of a SAP for RPPs.</p> <p>Ecology clarification meeting (10/31/06) – Jean Vanni clarification – This unit does not have a ROD. The “plug-in approach” refers to a ROD remedy and would not be included until the ROD. She also states that this is an issue beyond this unit and needs to be discussed within Ecology. Her expectation is that the “plug-in” approach would not be introduced in a feasibility study.</p> <p>Preliminary Response - RL acknowledges that for the 200-CS-1 OU specifically, it is unlikely that additional waste sites would be appropriate plug-in candidates. However, the flexibility provided by this approach is still valid and needs to be preserved. In order to include approaches and strategies in the ROD, these approaches and strategies should be discussed in the feasibility study and proposed plan.</p>
Policy or Plateau-Wide Issues (total = 46 comments)		
<p>#6, 7, 8, 10, 30, 34, 36, 105, 108, 112, 115, 117, 127, 130, 136, 169, 172, 174, 181, 189, 190, 193, 201, 202, 204, 211, 212, 213, 229, 230, 235, 236, 241, 263, 269, 276, 280, 281, 282, 289, 291, 293, 299, 300, 303, and 306.</p> <p>These 46 comments relate directly to one or more policy or plateau-wide issues, including Land Use, Points of Compliance, Exposure Scenarios Institutional Controls, Protection of the Groundwater Pathway, RCRA/CERCLA Integration, 95UCL, and PCB Congeners Analysis. During the development of the Draft B FS and PP, those issues that have been resolved will be reflected in the revision.</p>		
Comments to be incorporated as clarified in the FS Draft B		
Remaining 276 comments		