



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
 REGION 10 HANFORD/INL PROJECT OFFICE  
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March 20, 2007

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Matthew S. McCormick  
 U.S. Department of Energy  
 Richland Operations Office  
 P.O. Box 550, A5-11  
 Richland, WA 99352

Re: Additional U.S. Environmental Protection Agency Comments on the Remedial Design/Remedial Action Work Plan for the 221-U Facility

Dear Mr. McCormick:

In a comment letter dated March 7, 2007, the U.S. Environmental Protection Agency (EPA) provided comments on the *Remedial Design/Remedial Action Work Plan for the 221-U Facility* (DOE/RL-2006-21). That letter also requested a meeting with the U.S. Department of Energy (DOE) to transmit minor additional comments. DOE has not responded to this request for a meeting. EPA is providing additional comments in this letter, partly because there is one major comment we wish to make after reading comments from the Washington Department of Ecology (Ecology). The comments follow:

1. Page 2-3, Section 2.2.3. The author is confusing the concept of a containment remedy with the use of RAGs or cleanup levels. The statement in the last sentence is applied too broadly and is in conflict with the fact that one is allowed to leave behind contamination as long as it meets the RAGs and that such a situation does not constitute a containment remedy. Please revise to accurately characterize how RAGs are applied in concept and then explain that the remedy for 221-U is a containment remedy that does not rely on meeting cleanup levels, but rather on limiting or preventing exposure.
2. EPA received an advanced copy of the comments from Ecology and believes that they are good comments. They had an especially good catch on the fact that a groundwater point of compliance was not spelled out in the work plan. It is not acceptable to put off the details of the groundwater monitoring until the other U Plant area decisions are made. This is basically a CERCLA disposal unit (similar to ERDF) and it must meet the substantive requirements of the landfill regulations that are ARARs. This leaves little room for debate about where the point of compliance must be located (i.e., the edge of the landfill structure or just off of the cap toe). The facility has a large cross-sectional area with respect to the groundwater flow direction and EPA believes that if hydrologic conditions warrant more than 1-up-3-down, then this should be accounted for in the design. At a minimum there needs to be a 1-up-3-down monitoring network and this needs to be covered in the work plan. However, considering that integration is important and the other U Plant area decisions will be made before the remedy for 221-U is

constructed, changes can be made in future revisions of this work plan (and the O & M plan) to maximize the use of an area-based monitoring scheme as long as it isn't too much of a stretch from the standard landfill approach and the point of compliance does not change.

3. As indicated in the EPA comment letter from March 7, the coverage of ICs in the work plan is not much more than a cut-and-paste of what is in the ROD. The sitewide IC plan provides for the use of the RD/RA work plan and the O & M plan to provide the detailed processes or procedures for implementing the ICs. It was EPA's expectation that more detailed implementing procedures would be provided in the RD/RA work plan. These details need to be added to the revised work plan. Similarly, the O & M plan will need to have the implementing details for the post-construction/monitoring phase.
4. Page 5-14, Section 5.5.2, line number 1. It should be "selected remedy" instead of "preferred remedy."

Due to the need to transmit these additional comments, EPA considers the date that DOE receives this letter as the beginning of DOE's response period. If you have questions, please contact me at (509) 376-8665.

Sincerely,



Craig Cameron  
Project Manager

cc: Larry Romine, DOE  
Wade Woolery, DOE  
Rick Bond, Ecology  
Administrative Record: 221-U Facility (U Plant CDI) <sup>OU:</sup> U PLANT AA