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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10 HANFORD/INL PROJECT OFFICE  
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June 1, 2007

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for the Central Plateau  
U.S. Department of Energy  
Richland Operations Office  
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EDMC

Re: EPA General Comments on the *Supplemental Remedial Investigation/Feasibility Study Work Plan for the 200 Areas Central Plateau Operable Units* (Volumes I and II).

Dear Mr. McCormick:

The U.S. Environmental Protection Agency (EPA) has reviewed the draft *Supplemental Remedial Investigation/Feasibility Study Work Plan for the 200 Areas Central Plateau Operable Units* (Volumes I and II of DOE/RL-2007-02). EPA has several general or global comments on the document which are provided in this letter. EPA wishes to meet with the U.S. Department of Energy (DOE) on a project level in June 2007 to pass along and discuss specific comments on the document not presented as general comments in this letter.

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Here are EPA's general comments:

1. Please make it clear in the work plan that the Tri-Parties believe this "supplemental" data gathering is necessary for decision making. Also, the word "desire" is used to describe the Tri-Party interest in obtaining more characterization information. This should be replaced with our "need" for this information.
2. The document appears to be written by contractors for contractors. Several references to the various contractor team positions inappropriately refer to the "authority" that they have. The document needs to be revised to put things in the right regulatory context and describe DOE and the regulatory agency project managers as decision-makers. The document should have reflected the proper roles once it had been reviewed by DOE and it should have been revised prior to submittal to the regulatory agencies.
3. All volumes, appendices, and addenda (even including field sampling plans yet to be developed) must be part of the work plan which is a primary document. The work plan currently only indicates that Volume I is a primary document. It is very important that all portions of the work plan (including, but not limited to, the generic SAP and site-specific field sampling plans) are enforceable by the regulatory agencies. The text of the work plan, including text in the SAPs, must be revised to state that all are part of, and incorporated into, the work plan and that it is a primary document.

4. All references to generic "internal contractor procedures" (or similar verbiage) must be removed from all portions of the document. There either needs to be an explanation of the main tasks of an activity with sufficient detail to understand what is being done, or the actual name, number, and date of the version of the procedure need to be provided. There also needs to be a commitment to provide the procedures upon request to DOE and the regulatory agencies if those specific procedures are referenced. This is a recurring comment that should not have to be delivered over and over again. Additionally, DOE is on notice that EPA expects all future deliverables to comply with content of this comment.
5. The work plan needs to be consistent with the revised Tri-Party Agreement Action Plan. Unless waste site remedial design is so simple that a 90% design can be provided within 180 days of signature of the Record of Decision (deadline for delivery of a Remedial Design and Remedial Action [RD/RA] work plan), the Remedial Design Report and RD/RA work plan are going to be two separate deliverables. This is also a recurring comment, and EPA is providing notice to DOE that documents not consistent with these revisions to the TPA will be rejected.
6. EPA needs to review the referenced report *Characterization Technologies for Waste Site Model Groups* (SGW-32606), since this is relevant to the options described in future sampling and analysis plans that will be added to the work plan.
7. EPA expects that passive neutron logging will be used in conjunction with other characterization approaches to investigate transuranic isotope contamination accessible by boreholes. EPA understands the technical limitations of this technique and that it must be used in concert with other characterization approaches, especially in areas of high cesium content. The same comment was made for the 216-A-2 and 216-A-21 SAP.
8. EPA expects that every waste site characterized under this work plan will have data collected (e.g., survey, radiological logging, grab samples, test pit samples, auger samples or split spoon samples) on hazardous substances in the shallow zone (upper 15 feet of the vadose zone). This is essential for estimating human health and ecological risk from exposure to contamination in the shallow zone.
9. It appears that in at least one case the latest version of EPA analytical methods is not used, in contrast to the recent SAP covering electrical resistivity correlation at the 200 BC Cribs and Trenches. EPA would like to understand why there are two different versions being applied, and we look forward to discussing it during our meeting in June.
10. The discussion of post-ROD confirmatory sampling needs to provide a solid commitment to confirm the conceptual model at every analogous site (unless that site is investigated thoroughly pre-ROD). The word "may" must be replaced with "shall" when stating the requirement for confirmatory sampling.
11. For the summary of remedial technologies, there needs to be an entry added for unconventional excavation technology.
12. The DQO list and summary in the work plan describing the number of required boreholes, pushes, and test pits are only estimates for the level of needed characterization.

The numbers that count are the ones that are incorporated into the approved individual field sampling plans. The text of the work plan and generic SAP need to explain that.

13. References to the M-15 change package need to be replaced with text that reflects the current condition of approved changes to the Tri-Party Agreement.
14. Please revise language about High Resolution Resistivity (HRR) to reflect the expert panel feedback. Specifically, HRR needs to be replaced with ERT (Electrical Resistivity Tomography) because HRR is only the proprietary way of looking at raw ERT data. EPA doesn't expect that all of the DQO materials have to be revised as long as the difference is explained in the main text.
15. How does DOE plan to assure that the right samples are collected from boreholes being drilled for groundwater operable units? The sample collection, logging, and analyses that are to be performed for the purpose of understanding source operable unit waste sites need to be covered by this work plan and its SAPs.
16. Even though information from the remedial investigation efforts described in this work plan is not going to be placed in Remedial Investigation (RI) Reports, currently existing RI Reports need to have a cover letter that explains that the information and revised conceptual site models (if applicable) are to be incorporated into the Feasibility Study reports. Without cover letters, people viewing the older RI Reports may miss the benefit of revised information on the nature and extent of contamination at various waste sites.

This concludes EPA's general comments on the work plan. Consistent with the Tri-Party Agreement Action Plan Section 9.2, DOE must respond to comments (once both EPA and the Washington Department of Ecology have provided comments) within 30 days if DOE has issues with the comments or 60 days if document revision can go forward. Please contact me at (509) 376-8665 if you have questions.

Sincerely,



Craig Cameron  
Project Manager

cc: Jane Hedges, Ecology  
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Administrative Record: 200 Area NPL