



START

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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July 20, 1995

Mr. Bryan Foley, B-Pond Unit Manager
U.S. Department of Energy
P.O. Box 550
Richland, WA 99352

Dear Mr. Foley:

The Washington State Department of Ecology (Ecology) would like to provide the U. S. Department of Energy (USDOE) guidance on their development of a schedule for incorporation into the report entitled, *200-BP-11 Operable Unit RFI/CMS and 216-B-3 Main Pond, 216-B-63 Trench, and 216-A-29 Ditch Work/Closure Plan, Volume 1: Facility Investigation and Sampling Strategy (DOE/RL-40985-93-74, Draft B)* (Work Plan). The Work Plan schedule should be formally transmitted to satisfy the TPA milestone M-20-36. Currently, USDOE has missed M-20-36.

Ecology believes future TPA milestone commitments are based on successfully demonstrating that RCRA and CERCLA can be coordinated at 200-BP-11. The 200-BP-11 project is cited in both M-13-94-03 and M-20-94-05 as one example that would determine the viability of the coordinated approach. Future M-13 and M-20 commitments are based on this approach succeeding. If the approach fails, the parties agree to negotiate acceptable document submittal schedules.

Ecology's position is that 200-BP-11 needs to show success by September 1997 to provide the go-ahead and template for other work plans to follow during their coordination activities. Ecology defines success at 200-BP-11 as an approved CMS and Proposed Plan. To meet this deadline, characterization activities need to begin by October 1995. Please ensure that the 200-BP-11 schedule reflects a commitment to complete the CMS/Proposed Plan for 200-BP-11 by September 1997.

If you have any questions, please contact me at 736-3048.

Sincerely,

Norman T. Hepner, P.E.
Nuclear Waste Program

NH:mf

cc: Donna Wanek, USDOE
Paul Beaver, EPA

Richard Holten, USDOE
Admin Record (D-2-3, D-2-5, D-2-6,
200-BP-11)

