

U.S. ENVIRONMENTAL PROTECTION AGENCY  
REGION 10

Hanford Project Office  
Federal Building, Rm. 178  
P.O. Box 550, A7-70  
Richland, Washington 99352

May 31, 1989

(Hand Delivered)



REPLY TO  
ATTN OF: A7-70

Roger D. Freeberg  
Project Manager  
U.S. Department of Energy  
P.O. Box 550, A6-50  
Richland, Washington 99352

Re: Second Round Comments on RI/FS Work Plan for the  
1100-EM-1 Operable Unit

Dear Mr. Freeberg:

The Environmental Protection Agency (EPA) has finished its review on the revised Remedial Investigation / Feasibility Study (RI/FS) Work Plan that you submitted on May 1, 1989. The comments are enclosed.

We had to review the entire Work Plan again, as the revised portions were not highlighted or otherwise identified. This caused a significant use of our resources that we were not anticipating. In the future, please make sure that revised Work Plans for any operable units clearly indicate all changes made. This includes changes in response to our comments and changes that are made independently by the Department of Energy (DOE) or its contractors.

The document review cycle described in the Action Plan provides for the Work Plan to be sent to public comment 15 days after receiving the lead regulatory agency's comments on the revised document. For the 1100-EM-1 Work Plan, this would mean the public comment period would begin on June 15, 1989. At the same time, it has always been our intent that there would be concurrence on any major issues prior to submitting the document to public comment. We agreed that minor changes could be made during the comment period or in the 30 day period following public comment, prior to Work Plan approval.

The revised 1100-EM-1 operable unit Work Plan does not include all of the changes or additions that EPA requested in its first set of comments. Primarily, this involves the area of vadose or groundwater sampling or monitoring, as noted on the enclosure. These topics comprise major issues and EPA must be in concurrence prior to sending the Work Plan to public comment.

START

011/273649

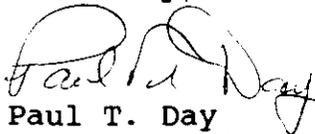
The following are options available to us at this point:

1. Defer the public comment period and undertake another revision of the Work Plan to address the major issues. This would result in approximately a 90 day delay in the review and approval cycle for this Work Plan;
2. Enter the dispute resolution process described in the Agreement, pertaining to the major issues. The delay would be dependent upon the level at which the disputes were resolved; or,
3. Enter into a commitment to address these issues in an expedited manner. A meeting has been scheduled late in the afternoon on June 1, 1989, to see if major issues can be resolved. If we can reach resolution on all the issues during that meeting, we can proceed with our current schedule for public comment on June 15; otherwise, we are faced with one of the first two options.

Our preference is for the third option, if possible. Regardless of the option we end up with, please address the enclosed comments and submit a revised Work Plan for the 1100-EM-1 operable unit by **July 17, 1989**. This allows a period of 45 days for your response.

If you have questions on any of the above, please contact me at (509) 376-6623 or FTS 444-6623.

Sincerely,



Paul T. Day  
Hanford Project Manager

Enclosure

cc: (with enclosure)

G. Hofer, EPA  
L. Goldstein / R. Stanley, Ecology  
R. Stewart, DOE  
J. Waite, WHC  
E. Pimentel, PRC  
W. Staubitz, USGS  
Administrative Record File (1100-EM-1 operable unit)