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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10 HANFORD PROJECT OFFICE
712 SWIFT BOULEVARD, SUITE 5
RICHLAND, WASHINGTON 99352

October 14, 1993



Robert G. McLeod
Unit Manager
U.S. Department of Energy
P.O. Box 550, A5-19
Richland, Washington 99352

Re: Transition of the 618-11 ERA into the RI/FS Process.

Dear Mr. McLeod:

The recent negotiations of the Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) resulted in two tentative agreements regarding the 618-11 ERA. These are that the remaining 300 Area operable units (300-FF-2, 300-FF-3, 300-FF-4, and 300-IU-1) would be consolidated into a single operable unit with an RI/FS work plan due in September 1994 and that the 618-11 Expedited Response Action (ERA) would be more appropriately implemented within the context of the consolidated 300 Area investigation.

On September 28, 1993 we submitted regulator comments on Draft A of the 618-11 ERA proposal. The regulator comments include both significant programmatic issues that need resolution, and ERA proposal-specific items. In view of the tentative agreements mentioned above, the ERA proposal will not be revised. However, the comments will affect the consolidated 300 Area effort. We propose that the three parties meet within 30 days to discuss the programmatic issues raised in the comments, as resolution of these issues will be required to ultimately proceed with remediation of the 300 Area. The proposal-specific items should be taken into account in the development of the 300 area work plan, but no formal written comment responses are necessary. At this time the 618-11 Burial Ground will be dropped as an ERA, with the understanding that removal/remedial actions will be discussed with the regulators as part of the scoping for the 300 Area work plan.



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The following list of regulator comments regard the programmatic issues and we suggest form the basis for discussions described above:

The last paragraph of the General Comments and Specific Comments: 2, 20, 21, 36, 38, 45, 63, 64, 65, 66, 67, 75, 76, 80, 88, 89, 91, 92, 101, 102, 119, 123, 129, 134, 137, 157.

We believe that this alternative method to handle the regulator comments will provide for resolution of the significant issues that are relevant within a 300 Area IRM/work plan context. If you have any questions regarding this matter, please contact me at (509) 376-9884.

Sincerely,

Laurence E Gadbois

Laurence E. Gadbois
Unit Manager

cc: Becky Austin, WHC
Dave Einan, EPA
Julie Erickson, DOE
David Holland, Ecology
Wayne Johnson, WHC
Roger Stanley, Ecology
Steve Wisness, DOE
Administrative Record (618-11 ERA, and 300 Area OU's)

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Author

Addressee

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Incoming: 9307449

Subject: TRANSITION OF THE 618-11 ERA INTO THE RI/FS PROCESS

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