

U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION 10



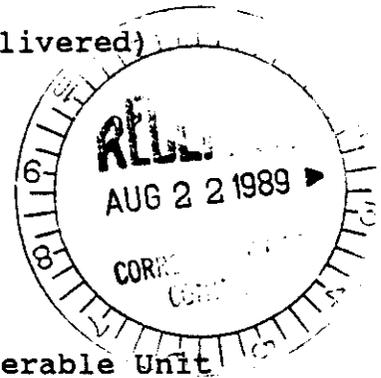
Hanford Project Office
Federal Building, Rm. 178
P.O. Box 550, A7-70
Richland, Washington 99352

August 18, 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: Conditional Approval of Remedial Investigation /
Feasibility Study Work Plan for the 1100-EM-1 Operable Unit

Dear Mr. Freeberg:

The U.S. Environmental Protection Agency (EPA), as the lead regulatory agency for the 1100-EM-1 operable unit, has completed its review of the revised Remedial Investigation / Feasibility Study (RI/FS) Work Plan which was dated August 1989. As you know, we did not receive any public comments on this document. However, changes have been made to the Work Plan as late as today, in order to correct errors and to clarify issues.

We are conditionally approving this Work Plan, as modified today, in order to allow you to begin scheduling field activities for the RI Phase I. This will allow the RI/FS process to stay on schedule, starting with field work planned for FY 89.

The major issue which has held up full approval involves the Environmental Investigations and Site Characterization Manual (the EIIs) and other procedures which must be cleared and publically available since they are referenced in the Work Plan. Recently, the Department of Energy (DOE) and your contractors have agreed to expand the scope of the EII manual to include specific procedures. We believe that this document, as upgraded over the next three months, will provide the appropriate level of detail for our review as it applies to this operable unit and to other operable units.

We have not yet had the opportunity to review and provide comments on all of the procedures that have been referenced in support of the 1100-EM-1 Work Plan. We have provided comments on several of the EIIs and have been given assurance from DOE that there was no significant disagreement with these comments and that they would be incorporated during the next revision of the EII manual. Therefore, we are conditioning our approval upon review of these procedures, upon satisfactory incorporation of our comments into the existing EIIs, and upon review of

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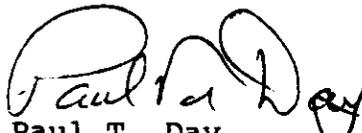
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additional EIIs as they are developed. Our concern is with those procedures and EIIs which could impact the quality of data obtained during the RI/FS. You should be aware that this situation could potentially result in the need for certain field activities to be repeated and that DOE is proceeding in full knowledge of that risk.

We appreciate the cooperation that has been shown by your staff in development of the Work Plan to its current status. This was the first Work Plan developed under the terms of the Tri-Party Agreement, and many policy issues had to be resolved by using this Work Plan as a test case. Resolution of certain major issues that arose during the development of this Work Plan is going to expedite the process at other operable units.

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

Sincerely,



Paul T. Day
Hanford Project Manager

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

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Addressee
R. D. Freeberg, DOE-RL

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Subject
Conditional Approval of Remedial Investigation/Feasibility Study Work Plan for the
1100-EM-1 Operable Unit

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