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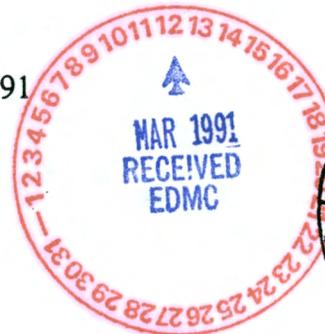


STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Mail Stop PV-11 • Olympia, Washington 98504-8711 • (206) 459-6000



March 1, 1991



Mr. Steve Wisness
U.S. Department of Energy
P.O. Box 550
Richland, WA 99352

**Re: RI/FS Work Plans for the 100-BC-1 and 100-BC-5 Operable Units/
Hanford Site Past Practice Investigation Strategy**

Dear Mr. Wisness:

Ecology has received your letter dated February 7, 1991 regarding approval of the 100-BC-1 and 100-BC-5 Operable Unit Work Plans, and other 100 Area work plans. We have also received two February drafts of the "Hanford Site Past Practice Investigation Strategy." We are addressing both the work plans and the proposed Strategy in this response since they are interrelated.

Concerning the Strategy, the first February draft was ostensibly USDOE's response to Ecology and EPA attorneys' reviews. However, it also included unrelated revisions. The second draft contained further amendments unrelated to communications with Ecology and EPA. It is evident from these drafts, and the meeting held in Richland February 21, that there are still a few key issues that must be resolved prior to our approval of the Strategy.

As discussed in the "Implementation" section at the end of the draft Strategy, the Strategy is intended to be an agreement-in-principle. Until a well-defined implementation plan is adopted, including new enforceable milestones, the Strategy remains little more than a concept. As Ecology noted in the meeting of the 21st, we have worked closely with USDOE in developing the Strategy. We fully expected its implementation to be achieved through the normal annual update to the TPA, and incorporated into USDOE's budgetary process.

Ecology did not intend that this Strategy would replace developing and implementing work plans in accordance with Milestones 12 and 13. It remains our belief that the aggregate area management study approach should complement, and hopefully supplement, much of the work designated for ground water operable units, and some of the work defined in the source operable units. Pending approval of the transition plan, now scheduled for delivery to

Author

TL Nord/Ecology

Addressee

SH Wisness/DOE-RL

Incoming Correspondence No.

9100795

Subject RI/FS Work Plans for the 100-BC-1 and 100-BC-5 Operable Units/
Hanford Site Past Practice Investigation Strategy

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