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STATE OF WASHINGTON

DEPARTMENT OF ECOLOGY

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July 27, 1993

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Mr. Paul Beaver
U.S. Environmental Protection Agency
Region 10 Hanford Project Office
712 Swift Boulevard, Suite 5
Richland, WA 99352

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Dear Mr. Beaver:

Enclosed are Ecology's comments on the *Feasibility Study Report for the 200-BP-1 Operable Unit*. Please consider these questions and comments when forwarding your assessment to the Department of Energy.

Ecology does not agree with the proposal for delaying clean-up activities at 200-BP-1 Operable Unit (BP-1) until the remedial action of the adjacent 241-BY Tank Farm is selected. The decision for Tank Farm remediation is projected in 2010.

Our recommendations are as follows:

1. Do not delay clean-up of BP-1 due to the indecision of the adjacent tank farm remediation.

2. Select a final remedial action that will not be impacted during any conceivable tank farm remediation. It is presently perceived that any retrieval of the contents of the adjacent tanks will impact barrier construction at BP-1.

3. If a final remedial action for BP-1 can not be chosen at this time, select a cost-effective, short term remedy. This interim remedy can be replaced with a final remedy after the clean-up action for the BY tanks has been determined. At this time, the use of the Hanford Barrier over BP-1 can be reconsidered.

HANFORD PROJECT OFFICE
JUL 2 9 1993
ENVIRONMENTAL PROTECTION AGENCY

It is our desire that you consider the following when determining use of barriers:

1. The installation and testing of the Hanford barrier at 216-B-57 on BP-1 achieves both the goal of capping one of the cribs and provides for field testing of this specific barrier design. However, final design of the barrier for the entire operable unit should be based on information gained during testing of the Hanford barrier at crib 216-B-57.

   The barrier should be designed appropriately for the units that it is placed on and not grossly over- or under-designed. It may be that a modified RCRA barrier is more appropriate for this operable unit. If a ROD is to be written before adequate testing of the Hanford barrier is completed, the ROD should allow the flexibility of 1) incorporating information from the testing into the final barrier design and 2) selecting a different remedy if the barrier does not perform as desired. Performance guidelines will need to be developed for the ROD for a barrier, as well as contingencies for containment failure, and trigger levels for further action.

2. We recommend that resources be spent on the units with the greater benefit derived from remediation and treatment. WAC 173-340-360 states that "...treatment technologies will be used whenever practicable. Use of treatment technologies should be emphasized at sites containing liquids wastes, areas contaminated with high concentrations of hazardous substances, highly mobile materials and/or discrete areas of hazardous substances...". The rule further states that "Ecology recognizes the need to use engineering controls, such as containment for sites or portions of sites that contain large volumes of material with relatively low levels of hazardous substances where treatment is impracticable." Therefore, while containment is appropriate in certain circumstances, careful evaluation should be given to this unit and all units when deciding if treatment provides a substantial benefit over containment or capping alone.

Our questions can be answered and comments further explained at the comment resolution meeting for the Feasibility Study. If you have any immediate questions, please call me at 736-3014.

Sincerely,

Nancy Uziemblo

Nancy Uziemblo
Unit Manager
Nuclear & Mixed Waste Management Program

NU:sl
Enclosure

cc: Darci Teel
Larry Goldstein
Toby Michelena
Lynn Coleman, TCP

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Subject: FEASIBILITY STUDY REPORT FOR THE 200-BP-1 OPERABLE UNIT

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