

200 Areas Soil Investigation Milestones Environmental Restoration Project (M-13-00 and M-20-00)



U.S. Department of Energy • U.S. Environmental Protection Agency • Washington State Department of Ecology

REQUEST FOR PUBLIC COMMENT

The U.S. Department of Energy (DOE), the Washington State Department of Ecology, and the U.S. Environmental Protection Agency (Tri-Parties) want your comments on changes to the Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) milestones for 200 Areas soil investigation in the Environmental Restoration Project. The changes have been made to reflect a more streamlined approach described in the *200 Areas Soil Remediation Strategy-Environmental Restoration Program* and grouping by similar waste types described in the *Waste Site Grouping for 200 Areas Soil Investigations*. All comments will be considered by the agencies before a final decision is made. **The public comment period begins November 24, 1997 and ends January 7, 1998.**

To request a copy of the document, or to submit comments either written or electronically, please contact:

Bryan Foley
U.S. Department of Energy
P.O. Box 550 (HO-72)
Richland, WA 99352
(509) 376-7087
E-mail: bryan_l_foley@rl.gov

BACKGROUND

The Hanford 200 Areas lie at the center of the Hanford Site (see map). Starting in 1943 and continuing for almost 50 years, facilities in the 200 Areas were used to separate uranium and plutonium out of irradiated nuclear fuel. In the process, radioactive and non-radioactive wastes were discharged to the soil around the facilities, contaminating the soil. Some of this contamination migrated to the groundwater.

The Tri-Party Agreement lists about 700 soil waste sites in the 200 Areas. Some of these are identified as Resource Conservation and Recovery Act (RCRA) sites and others as Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) sites. The Tri-Party Agreement contains a process and milestones to investigate and clean up these sites. Under the current process, the 200 Areas soil waste sites are grouped geographically into 32 operable units. Each operable unit would be investigated, evaluated, and cleaned up individually. Milestones require DOE to prepare work plans to investigate each operable unit.

WHAT ARE THE PROPOSED TRI-PARTY AGREEMENT CHANGES?

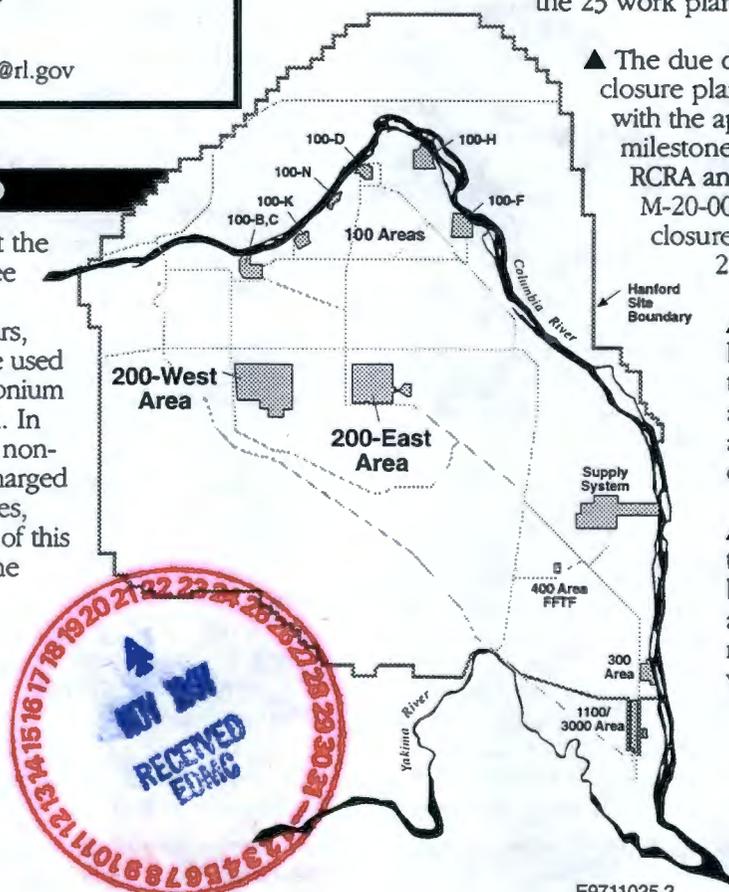
▲ CERCLA work plan submittals would be completed one year earlier than in the current Tri-Party Agreement schedule.

▲ The number of work plan submittals will be reduced from 32 to 23, reflecting the new waste groups. All of the 200 Areas soil waste sites will be incorporated into the 23 work plans.

▲ The due dates for individual RCRA closure plans will be adjusted to align with the appropriate CERCLA work plan milestones to allow coordination of RCRA and CERCLA. This will delay the M-20-00 Milestone date for RCRA closure plan submittals four years to 2004.

▲ An Implementation Plan will be developed that will establish the regulatory requirements and framework for CERCLA and RCRA work plans and closure plans.

▲ The waste groups for the first six work plans will be established along with a schedule for the remaining 17 waste group work plans.



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WHY ARE THE CHANGES BEING PROPOSED?

The milestone changes provide an improved process to investigate (characterize) the waste sites using lessons learned from cleanup already done in the 100 and 300 Areas at Hanford. One lesson learned is to group similar types of waste sites together for characterization and evaluation; this reduces the number of documents issued and lowers the cost. Another lesson learned is to investigate RCRA and CERCLA sites together to satisfy the requirements of both laws.

These changes maintain the Tri-Parties commitment to completion of 200 Areas soil waste site investigations under M-15-00 by December 2008 and the Tri-Parties commitment to completion of waste site cleanup under M-16-00 by 2018.

Key Points

- ▲ Reorganizes the 200 Areas soil waste sites into 23 waste groups. Each waste group would represent a different waste site type. The number of documents generated using 23 waste groups (compared to 32 operable units) would be reduced, saving an estimated \$11 million over the next 3-1/2 years.
- ▲ Proposes to characterize and evaluate the representative waste sites in each group and apply the results to other similar sites in the group.
- ▲ Coordinates RCRA closure plans and CERCLA work plans. The plans would be prepared under a single process with synchronized schedules.
- ▲ Supports integration of the tank waste program, groundwater program, waste management program, or facilities programs with environmental restoration work.

FOR MORE INFORMATION CONTACT:

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U.S. Department of Energy
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Richland, WA 99352
(509) 376-7087

**Or call the Hanford
Cleanup Toll-free Line
at 1-800-321-2008.**

U.S. Department of Energy
P.O. Box 550 (HO-14)
Richland, Washington 99352

HOW CAN YOU BE INVOLVED?

The proposed modifications and associated information may be reviewed at the information repositories listed below. Two additional documents are available to aid in reviewing the change package:

The *200 Areas Soil Remediation Strategy-Environmental Restoration Program* describes how the grouping based on waste site type will streamline the characterization process.

The *Waste Site Grouping for 200 Areas Soil Investigations* establishes the various groups and assigns the environmental restoration soil waste sites to the 23 waste groups.

A written summary of comments and responses will be sent to all individuals who provided comments, and will also be placed in the public information repositories. A public meeting is not currently scheduled, however, should public interest indicate a need for a meeting, the Tri-Parties will respond accordingly.

PUBLIC INFORMATION REPOSITORIES LOCATIONS:

PORTLAND

Portland State University
Branford Price Millar Library
Science and Engineering Floor
Tri-Party Information Repository
934 SW Harrison
(503) 725-3690
Attn: Michael Bowman

SEATTLE

University of Washington
Suzzallo Library
Government Publications Room
(206) 543-4664
Attn: Eleanor Chase

RICHLAND

U.S. Department of Energy Reading Room
Washington State University, Tri-Cities
Consolidated Information Center, Room 101L
(509) 372-7443
Attn: Terri Traub

SPOKANE

Gonzaga University
Tri-Party Information Repository
Foley Center
E. 502 Boone
(509) 324-5932
Attn: Tim Fuhrman