

S&GRP Central Plateau Remediation Project
DOCUMENT REVIEW AND COMMENT FORM

1. Date: 11/20/2007

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3. Project: 200-ZP-1 OU
Proposed Plan

4. Review No: DOE/RL-2007-33,
Draft A

5. Document Number(s)/Title(s): DOE/RL-2007-33, Draft A
Proposed Plan for the Remediation of the 200-ZP-1 Groundwater Operable Unit

6. Program/Project/Building Number

7. Reviewer
Ecology

8. Organization/Group
Washington Department of Ecology

9. Location/Phone

12. Comment Submittal Approval (optional):

15. Concurrence with indicated comment disposition(s)

17. Closure Approval No Comments
 (Disposition status is either "Open", "Closed", etc.)

 Reviewing Organization Manager (print / sign)

 Date

 Reviewer/POC (print/sign)

 Date

 Reviewer/POC (print/sign)

 Date

 Date

 Author/Originator (print/sign)

 Date

 Author/Originator (print/sign)

Item	10. Page/Line	11a. Comment (include technical justification for comment)	11b. Recommended Change	13. (A)cccept or (R)reject	14. Disposition (provide justification if NOT accepted)	16. Status
1	General	<p>ARAR. MTCA -WAC 173-340 clean up levels are ARARs. (e.g. MTCA Method B ground water clean up levels which are more stringent than federal standard are CCL₄ – 0.3 ppb, TCE – 0.1 ppb, Cr⁺⁶ – 48 ppb). Table one pg.6 is incorrect.</p> <p>Federal drinking water standards are not the only ARAR. Pg. 12. Contaminant values need to be compared against WAC 173-340 ARARs.</p> <p><i>attached to : 0076363</i></p>	<p style="text-align: center; font-size: 2em; opacity: 0.5;">RECEIVED FEB 27 2008 EDMC</p>	Not accepted	<p>Since Hanford is a Federal facility on the National Priorities List, MTCA is not applicable (42 U.S.C. 9620(a)(4)) (i.e., CERCLA Section 120(a)(4)). However, WAC 173-340 was reviewed as to whether elements were relevant and appropriate.</p> <p>USEPA provides guidance on determining whether a law or regulation is potentially relevant and appropriate. <i>“Determining whether a requirement is relevant and appropriate is site-specific and must be based on best professional judgment. This judgment is based on a number of factors, including the characteristics of the remedial action, the hazardous substances present at the site, and the physical circumstances of the site and of the release, as compared to the statutory or regulatory requirement.”</i> (USEPA OSWER EPA/540/G-89/006, CERCLA Compliance With Other Laws Manual: Part I, Publication 9234.1-01, August 1988).</p>	0076365

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					<p>The cleanup levels in WAC 173-340 are not relevant and appropriate to the remediation of 200-ZP-1 given site-specific circumstances. For example, Method B for calculating cleanup levels in groundwater, are equations that use domestic (i.e., residential) exposure parameters. In Response to HAB Advice No. 132, the Tri-Parties agreed that "An industrial land us (sic) scenario will set cleanup levels on the Central Plateau. Other scenarios (e.g., residential, recreational) may be used for comparison purposes..." Provisions are not made in Method B to modify the exposure parameters to suit the site-specific circumstances. In fact, the results of the calculations in Method B are in direct conflict with published, promulgated drinking water standards set forth in WAC 246-290-310 (Maximum contaminant levels (MCLs) and maximum residual disinfectant levels (MRDLs) for drinking water supplies in the State of Washington) and cannot be adjusted appropriately to obtain results consistent with that part of the administrative code.</p> <p>Therefore, WAC 173-340-720 was deemed not relevant and appropriate to this remedy because the methods for calculation of cleanup levels are not compatible with the fundamental assumptions that were agreed to be used to develop exposure scenarios and cleanup levels for the Central Plateau remedies.</p> <p>It is important to note that this remedy does attempt to return the groundwater to beneficial use over the course of the remedy with the objective of meeting Federal maximum contaminant levels (MCLs) as required by the National Contingency Plan (NCP). The goal is to achieve MCLs for constituents attributed to Hanford sources regardless of whether the</p>	

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					<p>constituent was determined by the baseline risk assessment to be a contaminant of concern.</p> <p>Further, while not ARAR, WAC 246-290-310 (Maximum contaminant levels (MCLs) and maximum residual disinfectant levels (MRDLs) for drinking water supplies in the State of Washington) are the same as the Federal MCLs. Therefore, the remedial action goal is to return the groundwater of the 200-ZP-1 operable unit to standards that are equivalent to those used for tap water in the State of Washington.</p> <p>EPAs Risk Assessment Guidance for Superfund (Chapter 2, p.10) also supports this approach: "...If the aquifer is a potential source of drinking water, then potential ARARs generally will include the federal non-zero MCLG, MCL, or state drinking water standard, and the most stringent (i.e., the lowest concentration) is identified as the most likely ARAR-based PRG."</p>	
2	General	<p>Dangerous Waste Regulations WAC 173-303 as ARAR. Corrective action for dangerous waste and dangerous waste constituents released into the environment under WAC 173-303-64620 (4) must be consistent with chapter WAC 173-340 to include clean up standards WAC 173-340-700 through WAC 173-340-760.</p>		Not accepted	<p>Both the Tri-Party Agreement and the Hanford Facility RCRA Permit acknowledge the process of considering both RCRA corrective action and CERCLA remedial action requirements at the same time. The final remedy decision will be made in order to satisfy both RCRA corrective action and CERCLA remedial action requirements.</p> <p>The substantive requirements of the Dangerous Waste Regulations (WAC 173-303) are evaluated and discussed in Appendix B of the feasibility study. Relevant and appropriate provisions of the Dangerous Waste Regulations are incorporated into Appendix B</p> <p>Elements of MTCA were evaluated as a</p>	

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					potential ARAR for this operable unit (see response to Comment 1).	
3	General	Groundwater Cleanup. Ground water must be cleaned up to the most beneficial use. The proposed plan state that ZP-1 is <u>not expected to ever be used as drinking water</u> . This statement must be removed. The State has authority over the usage of water. This is also not in accordance with WAC 173-340 which requires that groundwater be returned to most beneficial use (drinking water). Again, state regulations are ignored and not established in the document as ARARs.		Partially accept	The text will be revised to indicate that the preferred alternative does attempt to return the groundwater to beneficial use over the course of the remedy with the objective of meeting Federal maximum contaminant levels (MCLs) as required by the National Contingency Plan (NCP). Elements of MTCA were evaluated as a potential ARAR for this operable unit (see response to Comment 1).	
4	General	Cleanup Levels. The proposed plan does not speak to meeting PRGs or clean up levels.		Not accepted	Cleanup goals are discussed on pages 5 and 6, lines 177 to 190 and are shown in Table 1.	