



Department of Energy
 Richland Operations Office
 P.O. Box 550
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10-AMRC-0050

JAN 19 2010

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 Office of Environmental Cleanup
 Hanford Project Office
 U.S. Environmental Protection Agency
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 Richland, Washington 99352

Ms. J. A. Hedges, Program Manager
 Nuclear Waste Program
 State of Washington
 Department of Ecology
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Addressees:

PROPOSED PATH FORWARD FOR AMENDING THE 100 AREAS INTERIM ACTIONS
 TO INCLUDE IN-SITU HEXAVALENT CHROMIUM TREATMENT TECHNOLOGY
 (TRI-PARTY AGREEMENT MILESTONE M-016-155)

References: (1) Ecology ltr. to J. R. Franco, RL, from N. M. Menard, same subject, dtd.
 December 3, 2009. 0081194

(2) EPA/Ecology ltr. to J. R. Franco, RL, from J. A. Hedges and D. A. Faulk,
 same subject, dtd. November 3, 2009. 0083921

The U.S. Department of Energy, Richland Operations Office (RL) is providing our approach for the role of In-Situ Reduction (ISR) technologies in the 100 Areas Interim Action Record of Decision (ROD). The following are key elements of our approach:

- ISR treatability tests for vadose zone and groundwater are planned for the 100-K Area,
- ISR treatability tests for groundwater are planned in the 100-D Area (subsurface bio-reactor and groundwater hot-spot tests),
- Results from the 100 K Area vadose zone ISR treatability study will be evaluated for potential use at other locations; and
- The current method of vadose zone remediation in the Interim Action ROD is remove-treat-dispose (RTD) (e.g., the 100-B/C and 100-D chromium source areas will continue to be remediated through RTD).

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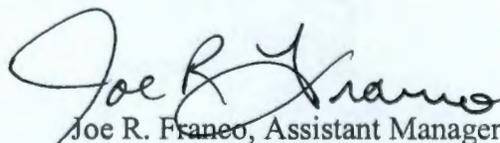
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We believe these key elements accommodate the comments received in December 2009 from the U.S. Environmental Protection Agency and the State of Washington Department of Ecology. Draft responses to regulatory agency comments on the Draft A Focused Feasibility Study (FFS) and Proposed Plan for In-Situ Reduction of the Hexavalent were provided and discussed at the initial workshop on January 7, 2010. This workshop was conducted to understand the regulatory expectations, and to elicit additional comments concerning potential ISR implementation in the 100 Areas. Based on the initial workshop, RL will hold an additional workshop to discuss those expectations and how they will be folded into the appropriate regulatory path forward. This workshop will be scheduled within 30 days of the date of this letter. Following the Tri-Parties agreeing upon a path forward, RL will submit a schedule for completing the FFS and conducting treatability tests for potential implementation of ISR technology alternatives through an Interim Action ROD amendment.

If you have questions, please contact me or your staff may contact Steve Balone, of my staff, on (509) 376-0236 or Jim Hanson, Office of the Assistant Manager for the Central Plateau, on (509) 373-9068.

Sincerely,


Joe R. Franeo, Assistant Manager
for the River Corridor

AMRC:SNB

cc: R. A. Lobos, EPA
N. M. Menard, Ecology
R. E. Piippo, CHPRC
TPA Administrative Record, H6-08