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Steven H. Wisness
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Dear Messrs. Jansen and Wisness:

The U.S. Environmental Protection Agency (EPA) is proposing a significant change to the Superfund process and schedules for the 1100 Area National Priorities List site at Hanford. The proposal (enclosed) describes a process which we believe will expedite cleanup of this area and save costs over the long-term. This approach requires an aggressive and innovative mindset toward cleanup, the Superfund process, and the Tri-Party Agreement.

This proposal reflects a willingness on the part of EPA to use a flexible approach to cleanup and to increase efficiency wherever possible. Your consideration and early feedback is appreciated. We propose that a kick-off meeting at the unit manager level be held within a week to discuss and refine the proposal and to identify and resolve any potential obstacles. The unit managers would then report to the project managers with a detailed recommendation for implementation, including a schedule. EPA's Unit Manager for the 1100 Area is Dave Einan.

Please feel free to contact either Dave Einan at (509) 376-3883 or me at (509) 376-6623.

Sincerely,

Paul T. Day
Hanford Project Manager



- cc: A. DeAngeles, PRC
J. Erickson, DOE
G. Hofer, EPA
D. Nylander, Ecology
W. Staubitz, USGS
T. Veneziano, WHC
Administrative Records (1100-EM-1, EM-2, EM-3, and IU-1)

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1100 AREA STRATEGY

Background

The RI/FS Report and proposed plan for 1100-EM-1 is due in December 1992 (currently reported to be on schedule).

EPA is beginning to draft the Record of Decision (ROD) at this time (to establish format, boilerplate, etc). The ROD should be issued early next summer.

The other operable units in the 1100 Area NPL Site (1100-EM-2, 1100-EM-3, and 1100-IU-1) are much lower in priority, with RI/FS's and ROD's not scheduled for several years. The waste sites currently identified (listed in WIDS) in these operable units (see Table 1) are not considered to major sources of contamination and there is a low likelihood of groundwater contamination from these sites. It should be noted that one fuel storage tank located in 1100-EM-3 (not listed in Table 1) had leaked and may have contaminated the groundwater.

Proposal

EPA is proposing an innovative approach to investigating and characterizing the waste sites in the 1100-EM-2, 1100-EM-3, and 1100-IU-1 Operable Units. This proposal includes a final decision process and any necessary remediation at these sites on an accelerated schedule.

The Hanford Past-Practice Investigation Strategy allows us to make cleanup decisions as early in the process as can be supported by data and information about the waste site and available technologies for remedial action. The national Superfund program is looking at the concept of "presumptive remedies." This concept is based on the experience that for a given type of site, the universe of potential remedies is relatively small and each has been tried at other sites. A remedy is presumed, initiated, and then either continued or altered based upon performance.

EPA proposes that DOE conduct quick scoping activities for the waste sites in these operable units and analyze all available data and information. It is possible that certain sites may have been included in error (e.g., hazardous waste staging areas, active underground storage tanks, etc.). On the other hand, new sites may be identified. The scoping activities should determine which sites may require remedial action.

If the scoping effort (to take place over the next 60 days) confirms the premise that the waste sites (which require remediation) are minor in terms of volume and contaminant migration, EPA presumes that each waste site will be removed and packaged for off-site shipment to an appropriate, approved facility.

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The removal of each site would be accompanied by a combination of field and laboratory analyses to confirm that the contamination was removed. This is a very conservative approach to remediation, but the cost of complete removal would be offset by reduced effort and cost associated with investigation and characterization. These sites are expected to be relatively minor with respect to nature and extent of contamination. Additionally, this eliminates much of the work necessary to support a risk assessment.

Several groundwater monitoring wells currently exist in 1100-EM-2 (installed under the 1100-EM-1 RI/FS), and sampling of these wells would continue. However, if waste sites were completely removed as confirmed by soil analyses beneath the sites, additional groundwater investigations would not be required.

Under the scenario described above, the three operable units could be included in the ROD for 1100-EM-1. It would necessitate either expansion of the 1100-EM-1 RI/FS Report and proposed plan (by December 1992) or a subsequent addendum to these documents shortly thereafter. EPA would then issue the ROD for the entire 1100 Area.

Evaluation of Proposal

Clearly, there are advantages and disadvantages to this approach. However, the parties have been promoting the concepts of innovative, cost-effective solutions and taking increased, shared risks. EPA has considered the following in proposing this approach.

Advantages:

1. The cost of investigation/characterization of three operable units is significantly reduced.
2. Four operable units can be addressed in a single ROD, saving administrative costs.
3. An entire NPL site is addressed, rather than a single operable unit (1100-EM-1) with the ROD.
4. Technology constraints do not exist. This is non-radioactive waste, so it can be disposed off-site at an appropriate facility. The technology to physically conduct the removal actions is well established and available.
5. It is possible that new waste sites which need attention may be identified during the scoping process.
6. The conservative approach of complete removals should be fully acceptable to the public and to specific stakeholders such as the City of Richland. The City of Richland should also support the accelerated schedule of remediating hazardous waste sites near its well field. The general public will also be glad to see actual final remediation occurring at Hanford.

7. The 1100-IU-1 Operable Unit on Rattlesnake Mountain contains the only known waste sites within the Arid Lands Ecology Reserve. By taking an accelerated action at these sites, DOE can begin the process of land transfer, if it desires.

Disadvantages

1. Funding to support scoping (immediately) and the removals (likely to begin in FY 93 since remedial design is not an issue) has not been planned for three operable units in DOE's budget process. EPA has not made an assessment of the impact of increased near-term costs.
2. The parties will likely be accused of:
 - a. bypassing the Superfund process;
 - b. focusing effort and funding on very low priority sites, rather than on the "worst first" basis; and,
 - c. wasting taxpayers' money with the conservative approach of complete removals at insignificant sites that may not threaten public health.Obviously, these criticisms will be levied from different sectors of the public.
3. To the extent hazardous waste subject to RCRA-LDR requirements are found in these waste sites, such wastes/soils will have to meet the LDR requirements. This is a potential cost that should be considered.

Summary

EPA has considered the tradeoffs of this proposal (except for cost calculations and budget implications) and believes this approach should be aggressively pursued.

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Site Name	Operable		Location
	Unit	Alias	
1100 Area Bus Shop Underground Hoist Rams	1100-EM-2		Under the 1171 Building Bus Shop [315]
1100 Area HWSA	1100-EM-2	1100 Area Hazardous Waste Staging Area [315]	North of the 1171 Building [315]
1100 Area Used Oil Tank 4	1100-EM-2	1100 Area Underground Used Oil Tank (tank #4) [315]; 1171-4 [396]	Under the 1171 Building Light equipment shop [315]
1100 Area Used Oil Tank 5	1100-EM-2	1100 Area Underground Used Oil Tank (tank #5) [315]; 1171-5 [396]	Just outside and east of the 1171 Building [315]
1100 Area Used Oil Tank 6	1100-EM-2	1100 Area Underground Used Oil Tank (tank #6) [315]; 1171-6 [396]	Just outside and north of the 1171 Building [315]
1100 Area Underground Steam Pad Tank 2	1100-EM-2	1171-2 [396]	Just outside and north of the 1171 Building [315]
1100 Area Underground Steam Pad Tank 3	1100-EM-2	1171-3 [396]	Just outside and north of the 1171 Building [315]
3000 Area Jones Yard HWSA	1100-EM-3	3000 Area Jones Yard Hazardous Waste Staging Area [NR];	South of the 1226 Building in the southeast corner of the fenced area
3000 Area Underground Used Oil Tank	1100-EM-3		East of the 1226 Building Equipment Shop [315]
3000 Area 1208 HWSA	1100-EM-3	3000 Area 1208 Building Hazardous Waste Staging Area [NR];	At the 1208 Building Paint Shop [315]
3000 Area 1226 HWSA	1100-EM-3	3000 Area 1226 Building Hazardous Waste Staging Area [NR];	At the 1226 Building Automotive Shop [315]
3000 Area 1234 Storage Yard	1100-EM-3	1234 Building Storage Yard [315]	At the 1234 Building [315]
3000 Area 1240 HWSA	1100-EM-3	3000 Area 1240 Building Hazardous Waste Staging Area [NR];	At the 1240 Building Machine Shop [315]
700 Area Waste Solvent Tank	1100-EM-2	700 Area Underground Waste Solvent Tank [315]; 703-1 [396]	Directly east of the 703 Building in the 700 Area Motor Pool parking lot
Simulated High-Level Waste Slurry Treatment and Storage UN-3000-1	1100-EM-3	UPR-3000-1 [309]	A sink within Lab 1623 in the PS Building [NR]
6652-C SSL Active Septic Tank	1100-IU-1	6652-C Space Science Laboratory Active Septic Tank [315]	At the 6652-C Space Science Laboratory off Rattlesnake Mountain Road
6652-C SSL Inactive Septic Tank	1100-IU-1	6652-C Space Science Laboratory Inactive Septic Tank [315]	At the 6652-C Space Science Laboratory off Rattlesnake Mountain Road
6652-G ALE Field Storage Building Septic Tank	1100-IU-1		At the 6652-G Field Storage Building, NW of the Space Science Lab
6652-I ALE Headquarters Septic Tank	1100-IU-1	6652-I Arid Lands Ecology (ALE) Headquarters Septic Tank [315]	At the 6652-I ALE Headquarters Building, NW of the Space Science Lab
Rattlesnake Mountain Nike Missile Base	1100-IU-1		

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Subject: 1100 AREA NATIONAL PRIORITIES LIST SITE AT HANFORD

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This operable unit belongs to the Army Corps of Engineers.



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