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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 10 HANFORD PROJECT OFFICE

712 SWIFT BOULEVARD, SUITE 5

RICHLAND, WASHINGTON 99352

May 24, 1995



Glenn Goldberg
Operable Unit Manager
U.S. Department of Energy
P.O. Box 550 H4-83
Richland, Washington 99352

Re: Comments on Proposed Plans for the 100-IU-1, 100-IU-3,
100-IU-4, and 100-IU-5 Operable Units

Dear Mr. Goldberg:

The U.S. Environmental Protection Agency (EPA) and the
Washington State Department of Ecology (Ecology) have completed
their review of the above mentioned proposed plans. The EPA and
Ecology recommend that these four plans be combined into one
document.

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The EPA and Ecology met with the U.S. Department of Energy
(DOE) on May 23, 1995 to discuss these plans. At that time, EPA
presented a draft combined plan as well as a model plan from
Allied Plating for DOE's use. After review of the draft and the
model plan DOE agreed informally to combine these units into one
plan.

The format for the operable units should be presented in
numerical order. The format should consist of a brief
introduction of the operable units, a section on public
participation, followed by operable unit specific discussions.
The operable unit discussions should be limited to site
background and summary of site risks. The proposed plan should
be concluded with a discussion of the preferred alternative of no
further action for these four operable units.

Public involvement for this proposed plan should be
coordinated with the issuance of the proposed plans for 100-BC-1,
100-DR-1, and 100-HR-1 operable units. This will allow for a
more efficient use of advertising space as well as focus sheet
preparation. Combining this proposed plan with the 100 Area
plans is consistent with feed back received at the May public
involvement meeting held with Hanford stakeholders.

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It is anticipated that the 100 area proposed plans will be
available for public comment around June 15, 1995. If the 100
area proposed plans are not issued in this timeframe, then the
revised proposed plan for the 100-IU-1, 100-IU-3, 100-IU-4, and
100-IU-5 Operable Units may be issued separately. The EPA and
Ecology recommend that no public meeting be scheduled for this
proposed plan. However, the plan should state that if requested

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by the public a meeting will be held. Gary Freedman will be the point of contact for comments and Dennis Faulk will be the point of contact regarding the public meeting.

Operable Unit specific comments are addressed in Enclosure 1. If you have any questions or concerns please contact me at (509) 376-8631 or Gary Freedman of Ecology at (509) 736-3026.

Sincerely,



Dennis Faulk
Operable Unit Manager

Enclosure

w/o Enc.

cc: Gary Freedman, Ecology
Julie Erickson, DOE
Donna Powaukee, NPT
Russell Jim, YIN
J.R. Wilkinson, CTUIR
Administrative Record (100-IU-1, 100-IU-3, 100-IU-4 and 100-IU-5 Operable Units)

General and Specific Comments

General Comments

It is recommended that only one map be produced for the plan. The map should clearly show the location of each operable unit.

A sentence should be added describing the 100-IU-2 operable unit and mention that it will be investigated later. This will help clarify the discussion of 100-IU-2 in the Pickling Acid section.

A general discussion should be added in the introduction detailing the OEW survey and the conclusions.

Specific Comments 100-IU-1

Comment:

Rewrite the discussion on BPA. State that there are no hazardous waste sites known in this area and the BPA portion will not be addressed in this proposed plan.

Comment:

Remove reference to figure 2, 3, and 4 through out the discussion.

Comment:

Define landlord cleanup.

Comment:

Describe what aldrin and dieldrin were used for.

Comment:

Delete the last two paragraphs of the Site Background discussion.

Comment:

Combine the Expedited Response Action Summary and Summary of Site Risks discussion together. Retitle to "Summary of Site Risks." In the discussion on pesticide drums being sent to the central landfill add a discussion on the sampling information that indicated that the drums were non-hazardous.

Comment:

After the discussion on the results of soil samples at the pesticide site add the statement that these are below the cleanup levels set under MCTA.

indicates that the landfill did not contribute to GW contamination.

Comment:

Delete the discussion on when an ERA is taken.

Comment:

Combine the ERA Summary and Site Risk section and retitle "Summary of Site Risks".

Specific Comment 100-IU-5

Comment:

Delete the first paragraph of the background section.

Comment:

Delete the word nevertheless in Summary of Site Risk section.