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Director

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DEPARTMENT OF ECOLOGY

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October 12, 1989



John Broderick
Unit Manager
U.S. Department of Energy
P.O. Box 550 (A6-50)
Richland, Washington 99352

RE: Review of the Draft Resource Conservation and Recovery Act Facility Investigation and Corrective Measures Study Work Plan for the 100-HR-1 Operable Unit

Dear Mr. Broderick,

In accordance with the Hanford Federal Facility Agreement and Consent Order, the Washington State Department of Ecology, as lead regulatory agency for the 100-HR-1 Operable Unit, has completed it's review of the Draft 100-HR-1 Operable Unit Work Plan. The attached comments and recommendations also incorporate the review of the U.S. Environmental Protection Agency.

The review of the Draft 100-HR-3 Operable Unit Work Plan will be submitted under separate cover, on October 18, 1989.

Overview

The primary focus of this review is on technical issues, as compared to programmatic issues. The current effort is considered by Ecology to be the first of two reviews.

The second review will incorporate additional comments on programmatic issues, as well as on the technical issues presented in the second draft. Programmatic issues include evolving policies and interpretive guidelines assuring integration of the RI/FS and RFI/CMS substantive requirements in a complementary and consistent fashion.



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The integration of the regulatory programs is critical to assure the Hanford Site is brought into compliance and remediated in accordance with federal and state law in a timely, aggressive and cost-effective manner. The second review cycle for this work plan, and the 100-HR-3 Work Plan, will include recommendations to insure such consistency.

Summary of Concerns

The following is a partial summary of general concerns as they apply to the Draft 100-HR-1 Operable Unit Work Plan:

Undue reliance on historical data that may not be verified.

Lack of sufficient information to justify preliminary conclusions.

Assumptions concerning naturally occurring levels for certain constituents.

Inadequate data management programs, including deficiencies in comprehensive planning, integration and coordination.

Questions on investigative protocols and instrumentation.

Questions concerning statistical assumptions and conclusions.

Inadequate technical and procedural integration with the 100-HR-3 Operable Unit Work Plan.

The Department of Ecology looks forward to a continued close working relationship with EPA and DOE for an expeditious resolution of these complex issues, as they apply both to the operable units in question, and to site-wide characterization.

Review Organization

This review is organized according to the work plan presentation. Miscellaneous comments, noted deficiencies and recommendations for improvements are given for the first eight chapters of the work plan. These are followed by comments on the various technical management plans included as attachments to the work plan.

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Future Work

In accordance with the schedule for primary document review specified in the Action Plan, Department of Energy response to these comments are due to Ecology and EPA within 60 calendar days, or December 12, 1989.

We trust many concerns will be addressed through the Operable Unit Managers meetings, various special topics meetings, and informal communication prior to December. Please don't hesitate to contact me with any questions you have concerning these comments and recommendations. My phone number is (206) 438-7018.

Sincerely,




Larry Goldstein
Ecology Unit Manager

LG:tkr

Attachments

cc: w/attachments

Paul Day, EPA
Doug Sherwood, EPA
Roger Freeberg, DOE
Mike Thompson, DOE


Tom Wintczak, WHC

Administrative Record File (100-HR-1)
Administrative Record File (100-HR-3)

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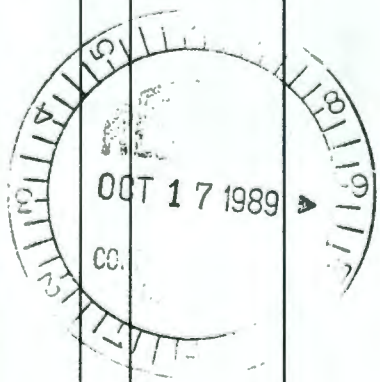
Correspondence No.
Incoming Letter # 8904285

cc: J. L. Waite
Subject REVIEW OF THE DRAFT RCRA FACILITY INVESTIGATION AND CORRECTIVE MEASURES
STUDY WORK PLAN FOR THE 100-HR-1 OPERABLE UNIT

10/16/89 LW:dh

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