

START

memorandum

0018126

DATE: DEC 10 1991

REPLY TO: EM-442 (M. Harmon, 3-8167)

SUBJECT: DOE-HQ Comments on Five Re-scoped Work Plans

TO: Liz Bracken (RL, ERD)

DOE Headquarters has reviewed the five re-scoped work plans:

- 1) RCRA Facility Investigation/Corrective Measures Study Work Plan for the 100-HR-1 Operable Unit, Hanford Site, Richland, Washington
- 2) RCRA Facility Investigation/Corrective Measures Study Work Plan for the 100-HR-3 Operable Unit, Hanford Site, Richland, Washington
- 3) RCRA Facility Investigation/Corrective Measures Study Work Plan for the 100-DR-1 Operable Unit, Hanford Site, Richland, Washington
- 4) Remedial Investigation/Feasibility Study Work Plan for the 100-BC-1 Operable Unit, Hanford Site Richland, Washington
- 5) Remedial Investigation/Feasibility Study Work Plan for the 100-BC-5 Operable Unit, Hanford Site Richland, Washington

and the resulting comments are attached. The work plans were found to be generally well written and complete. Pending resolution of the attached comments, in accordance with the Headquarters Document Review Protocol dated October 25, 1991, the work plans are approved.

Please have your staff contact Mary Harmon (FTS 233-8167) if there are any questions concerning these comments.

Sally A. Mann

Sally A. Mann, Ph.D.
Director
Office of Northwestern Area Programs
Environmental Restoration



Attachments

RECEIVED
DEC 13 1991
191-ERB-730
DOE = RL/CCC

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DOE-HQ Comments on RFI/CMS Work Plan,
Draft C, for 100-HR-1 Operable Unit

Page	Section	Comment
iii	Acronyms	The definition for the acronym "GIS" should probably read "geographic information system."
1-4	1.1	Clearer definition is needed in the RFI/CMS scope. Paragraph two of this page indicates that the purpose of the initial focus is to evaluate the need for Expedited Response Actions and Interim Remedial Measures. In section 1.2, the goal of the RFI/CMS is defined as the optimization of the use of Interim Remedial Actions (with no mention of ERAs). Section 3.3.5 states that an ERA is not warranted at the 100-HR-1 OU. Then, in the second paragraph of section 4.0, it is stated that "...data are needed for specific waste sources..." and that "The data must be adequate to determine whether threshold concentrations of contaminants are exceeded that should be remediated through an ERA or IRM." The confusion here is, when was it (will it be?) determined that an ERA is not justified at this OU, or is it an ongoing determination?
1-5	1.3	In the fifth paragraph of this page, "Chapter 9" should be changed to "Page WP iii."
2-5	2.1.3.1.4	The text should state whether or not the outfall structure was demolished <u>and removed</u> , or <u>buried in place</u> .
2-7	2.1.3.3	Consistent terminology should be used when referring to the site structures. The 116-H-7 sludge burial trench is also referred to as the 107-H sludge burial trench. Also, in the last paragraph of this section, it is stated that the excavated soils were tested at that time (at the time of excavation for retention basin backfill). As the last sentence of this section, this statement screams for more information: where is the resultant data presented?
2-25	2.2.5.4	The third sentence of this section is not a sentence.
2T-1a	Table 2-1	The status and description for <u>all</u> facilities (for example, the process effluent pipelines) should be included in this table.
3-1	3.1	The TPA milestones corresponding to the discussion in the last sentence of the second paragraph are M-28-04 and M-29-02, both of which are due in FY 1992, not FY 1991 as is stated.

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3-28

3.4.2

In the second full paragraph of this page, it is stated that waste removal actions would probably be required to meet corrective action objectives to protect human health based on residential or agricultural land use of the 100-HR-1 operable unit. Unless this has already been agreed to with the regulators, it should not be conceded here. At the least, change the words "would probably" to "may." The determination of future land uses will require the integration of the Land Use Working Group, the HRA-EIS and the PEIS.

3F-3

Fig. 3-3

With NW and W prevailing winds, have air sampling stations been considered for the north and east shores of the river?

9 2 1 2 4 6 7 1 7 8 8

DOE-HQ Comments on RI/FS Work Plan
for 100-BC-5 Operable Unit, Draft B

Page	Section	Comment
3-32	3.4.1	The preliminary action objective shown in the second bullet appears to be an appropriate objective for the source operable units in the 100-BC area.

9 2 1 2 4 6 7 1 7 8 9

Review Comments
RCRA Facility Investigation/
Corrective Measures Study Work Plan
for the 100-BC-1 Operable Unit,
Hanford Site, Richland, Washington
Draft B

Page	Section	Comment
WP iii		The acronym "GIS" probably means geographic information system.
WP 3-23	3.3.1.4	Absorption through the skin is a possible route for exposure for some contaminants, which may be appropriate for consideration here.
WP-4T-2a	Table 4-2	Pathway is a poor choice of terms for use in the heading of column 4. This term has specific meaning as applied to contamination studies.
WP 5-21	5.2.3.2.5	Cost should only be considered an evaluation criterion when the other criteria are equally satisfied by the evaluated alternatives.

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Review Comments
RCRA Facility Investigation/
Corrective Measures Study Work Plan
for the 100-DR-1 Operable Unit,
Hanford Site, Richland, Washington
Draft C

Page	Section	Comment
WP iii		The acronym "GIS" probably means geographic information system.
WP 3-22	3.3.1.4	Absorption through the skin is a possible route for exposure for some contaminants, which may be appropriate for consideration here.
WP 4-4	4.1.1.2	The rationale of the observational approach seems well thought out but the discussion here seems to write off low priority sites a priori. This exclusion would fall short of characterizing the risk associated with the operable unit. An expanded discussion of what the data objectives are for low priority sites is needed.
WP 4T-2a	Table 4-2	Pathway is probably a poor choice of terms for use in the heading of column 4. This term has specific meaning as applied to contamination studies.
WP 5-7	5.1.2.3.2	The term "standard non-EPA CLP methods" is confusing. Is this standard methods that are non-EPA and non-CLP or standard CLP methods that are non-EPA. Please clarify.
WP 5-24	5.2.3.2	Cost should only be considered an evaluation criterion when the other criteria are equally satisfied by the evaluated alternatives.

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Review Comments
**RCRA Facility Investigation/
Corrective Measures Study Work Plan**
for the 100-HR-3 Operable Unit,
Hanford Site, Richland, Washington
Draft C

Page	Section	Comment
WP iv		The acronym "GIS" probably means geographic information system.
WP 2-7	2.2.2.1.2	The word "theoletic" should read "tholeiitic".
WP 3-21	3.3.1.4	Absorption through the skin is a possible route for exposure for some contaminants, which may be appropriate for consideration here.
WP 5-24	5.2.3.2.5	Cost should only be considered an evaluation criterion when the other criteria are equally satisfied by the evaluated alternatives.

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CORRESPONDENCE DISTRIBUTION COVERSHEET

Author	Addressee	Correspondence No.
S. A. Mann, DOE-HQ	E. A. Bracken, RL	Incoming 9200401 (Xref 9157171D)

Subject: DOE-HQ COMMENTS ON FIVE RE-SCOPED WORK PLANS

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**A notation on RL's distribution sheet reads, "This makes a complete set of comments from all reviewers - Regulators, RL, HQ, SWEC."
ldp, 6-7049

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