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STATE OF WASHINGTON

DEPARTMENT OF ECOLOGY

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April 20, 1995

Ms. Dina L. Murphy
Acting Hanford Project Manager
U.S. Department of Energy
P.O. Box 550
Richland, WA 99352



Dear Ms. Murphy:

**RE: Hanford Federal Facility Agreement and Consent Order (Tri Party Agreement)
Change Control Form M-15-95-02B: 100 Area Source Operable Unit (OU) Proposed
Milestone Changes.**

This letter constitutes an Ecology and Environmental Protection Agency (EPA) response to our (April 19, 1995) receipt of the above noted change request, and Steve Wisness' accompanying letter dated April 14. Please note that we have disapproved this request, and are returning original documentation copies for your records. 41029

Ecology and EPA support efforts to gain efficiencies through process and documentation consolidation wherever those actions aid us in getting work done efficiently and in a timely manner while maintaining TPA commitments and our respective agency authorities. Unfortunately, it appears that the real effect of these proposed schedule modifications would be to delay cleanup at the areas in question (in direct contrast to commitments under our pending Environmental Restoration refocusing tentative agreement). We also note that this topic, and USDOEs' proposal, has neither been presented to or discussed by Agency Project Managers, and that the parties' March Project Managers meeting was, in fact, largely "preempted" at the request of USDOE management. We would be happy to reschedule this presentation/discussion for our coming May 3, 1995 session should you feel it necessary.

Sincerely,

Roger Stanley
Hanford Project Manager
Department of Ecology

Doug Sherwood
Hanford Project Manager
Environmental Protection Agency

cc: Larry Arnold, WHC
Julie Erickson, USDOE RL
Administrative Record

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Department of Energy

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APR 14 1995

Mr. Douglas R. Sherwood
Hanford Project Manager
U.S. Environmental Protection Agency
712 Swift Boulevard, Suite 5
Richland, Washington 99352

Mr. Roger F. Stanley, Director
Tri-Party Agreement Implementation
State of Washington
Department of Ecology
P.O. Box 47600
Olympia, Washington 98504-7600

Dear Messrs. Sherwood and Stanley:

HANFORD FEDERAL FACILITY AGREEMENT AND CONSENT ORDER (TRI-PARTY AGREEMENT)
CHANGE CONTROL FORM M-15-95-02B, 100 AREA SOURCE OPERABLE UNIT (OU) MILESTONE
CHANGES

The attached Tri-Party Agreement Change Control Form M-15-95-02B, "100 Area Source Operable Unit Milestone Changes," is submitted for review and approval. This change request outlines a strategy to reduce the number of Records of Decision (RODs) and supporting paperwork necessary to complete remedial actions in the 100 Area. This strategy will save significant time and resources in accomplishing our mutual goal.

Our intent is to submit streamlined Focused Feasibility Studies (FFS) and Limited Field Investigation (LFI) Reports for the remaining waste sites in the 100 Area. The first step would be to submit a 100-BC Reactor Area FFS appendix to the 100 Area Source OU FFS Report (DOE/RL-94-61). This report would include all waste sites in 100-BC-2 OU, and the remaining high and low priority waste sites in 100-BC-1 OU, i.e., all the remaining waste sites in the 100-BC Reactor Area. This report would also include a LFI Report that would consist of historical data and identify specific data gaps to be filled during remediation using the observational approach. The FFS would focus primarily on analysis of alternatives using specific data from low priority waste sites in the 100-BC Reactor Area. When the 100-BC Reactor Area supporting documents are complete, a 100-BC Reactor Area Proposed Plan and ROD could be issued.

Because the FFS "process document" and 100-BC FFS documents would generally address all types of waste sites found across the 100 Area, the FFSs for other reactor areas could be significantly streamlined. Proposed Plans for each reactor area, or combination of reactor areas, would be prepared using the "presumptive remedy" approach developed by the U.S. Environmental Protection Agency (EPA). The U.S. Department of Energy (DOE) has discussed the current

Messrs. Sherwood and Stanley

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OU by OU ROD strategy with EPA and State of Washington, Department of Ecology (Ecology), staff at several meetings, and although no agreement was reached on a future ROD strategy, it was agreed that the current strategy needed to be streamlined. In light of upcoming milestones (M-15-10C, -13C, 13D, -16E, and -16F), agreed to by EPA and Ecology staff, DOE took the initiative to prepare an approach that would significantly reduce the number of RODs and require much less documentation than the current approach. DOE presented this approach at the February 1995 and March 1995 Tri-Party Agreement Project Managers' Meetings, but because issues concerning proposed plans for the 100-HR-1, -DR-1, and BC-1 OUs were not resolved, the discussion was tabled. DOE has in good faith attempted to provide a strategy which meets the needs of all agencies.

As discussed with EPA and Ecology at the Project Managers' Meetings, DOE has stopped work on the milestones that, through mutual agreement, are considered to be an ineffective use of resources. The funding for completion of these milestones (M-15-10C, -13C, 13D, -16E, and -16F) has been diverted to the Streamlined Approach for Environmental Restoration Demonstration Project which is slated to begin in July 1995. Significant impacts to this project will occur if EPA and Ecology determine that the current milestones should remain on track.

DOE appreciate's EPA and Ecology's assistance in resolving this item, and look forward to proceeding with remediation of the 100 Area Source units. EPA and Ecology's expeditious evaluation of the facts and an early determination is requested. If you have any questions regarding this change request, please contact Ms. Nancy Werdel on (509) 376-5500 or Ms. Julie Erickson on (509) 376-3603.

Sincerely,



for Steven H. Wisness
Hanford Project Manager

RSD:NAW

Enclosure

cc w/encl:

S. Alexander, Ecology
S. Balone, EM-442
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