



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10 HANFORD PROJECT OFFICE

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0060552

June 27, 2003

Owen Robertson  
U.S. Department of Energy  
Richland Operations Office  
P.O. Box 550, A3-04  
Richland, WA 99352

Re: U.S. Environmental Protection Agency (EPA) Comments on "Remedial Design Report/Remedial Action Work Plan for the 300 Area" and "300 Area Remedial Action Sampling and Analysis Plan," DOE/RL-2001-47 and DOE/RL-2001-48 respectively (Rev. 1 Draft A versions)

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Dear Mr. Robertson:

The U.S. Environmental Protection Agency (EPA) has reviewed the subject documents, and our comments are enclosed for your consideration. The basis of this review was to determine if the RDR/RAWP and SAP adequately describe the design and the implementation of the remedial action processes for the 300 FF-2 Operable Unit waste sites, the 618-4 Burial Ground, and the remainder of the 300-FF-1 Operable Unit.

The comments are divided into general and specific comments regarding text in the documents. The resolution of general comments may require changes to multiple sections of the documents. Specific comments address items that need clarification, expansion, or correction on a particular page or section.

I recommend we set up a meeting to discuss the comments and their resolution rather than initiate a formal comment-response process at this point in time. Please contact me to set up a meeting at your earliest convenience.

Sincerely,

Mike Goldstein  
300 Area Project Manager

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EDMC

cc: Rich Carlson, BHI  
Ella Feist, BHI  
John Price, Ecology  
Admin. Record - 300 Area



## Attachment: 300 Area RDR/RAWP and SAP Comments

### General Comments

General Comment 1: The specific goals of regrading and backfill efforts should be stated as: "Waste sites shall be backfilled and regraded in a manner that will support industrial reuse of the site and result in positive drainage away from areas where residual subsurface contamination could result in adverse groundwater impacts. The grading shall maximize the amount of large flat areas suitable for industrial use and not have extensive rolling contours or depressions where water may accumulate." Therefore, some waste sites (e.g., ponds and trenches) may require a significant amount of imported fill material to achieve these goals. Resolution of this comment may impact several sections of the RDRRAWP, including section 3.6.4.

General Comment 2: The specific goal of revegetation should be stated as: "Waste sites shall be revegetated with native species that will survive without irrigation. The purpose of this sustainable revegetation is to provide dust control and prevent infiltration as an interim measure prior to redevelopment of the land. Subsequent land development design will include engineered runoff controls for parking lots and roof runoff to prevent residual contaminants from migrating to groundwater. Graveled areas will not be appropriate for areas that are over residual subsurface contamination." Resolution of this comment may impact several sections of the RDRRAWP, including Appendix C "Revegetation Plan for the 300 Area."

We also need to discuss references to the "Mitigation Action Plan for the 300 Area of the Hanford Site" (DOE-RL 2002). This is not a primary document, nor is it one that EPA has had a role in commenting on, so it should not be referenced as a requirement in this RDR/RAWP (Sections 2.1.1). It can be referenced as a document that is consulted, but not one that is required to be complied with (especially when it is inconsistent with the direction provided in this plan). Let's discuss to find a path forward.

General Comment 3: RDR/RAWP procedures need to be modified to allow for increased regulator review of site-specific design plans. At the least, more specific briefings will be provided at monthly unit manager meetings and EPA may request more specific documentation for approval to ensure consistency with the requirements of the Record of Decision and the RDR/RAWP when the new contract is awarded. The timing of these briefings and reviews will occur prior to the preparation of site-specific big packages or other subcontracting documents. Add a couple of sentences to Section 3.4 to acknowledge the lead regulator's role in this process (i.e., access to technical briefings on a regular basis and additional information as requested).

General Comment 4: An appendix that contains a discussion of the remediation approach and schedule for the 618-10 and -11 burial grounds still needs to be added to this document. The focus of this appendix should be on the key design questions that need to be addressed during the next three years as part of the "preliminary design phase" and the EM-50 Technology Demonstration project.



General Comment 5: Once a decision is made by DOE management regarding the "Outside the Fence" waste sites (June 19, 2003 briefing), the RDR/RAWP needs to be modified to include cleanup levels that are reflective of unrestricted uses for the following eight waste sites: 618-7, 300 VTS, 618-13, 600-47, 316-4 crib, 600-63, 600-259, and 618-10. To expedite this process, it is recommended that cleanup levels that are already established in the 100 Area RDR/RAWP be used.

General Comment 6: The RDR/RAWP and the SAP both contain tables listing the COPCs, but they are not consistent. These tables should be reviewed and a consistent set of COPCs used for the two documents. Another area that needs consistency is the description of the conceptual site model. The SAP uses the Shallow Zone and Deep Zone concept, but this does not appear in the RDR/RAWP.

General comment 7: All CVPs should contain 3 key pieces of information up front in the executive summary. They are: 1) How much soil (i.e., volume) and anomalous waste was removed?; 2) Was anything left behind that will require institutional controls (above and below 15 feet of depth)?; and 3) How much did this project cost? Please make appropriate changes to Section 2.3 and Appendix B.

### Specific Comments

Specific Comment 1: Page 1-2 of the RDR/RAWP mentions an anticipated land-use scenario. There needs to be a positive statement that the anticipated land use for the 300 Area has been determined to be industrial and that cleanup levels have been developed using an industrial land use scenario which is described in Section 2.1.2.1. There is not a good description of the industrial scenario in the RDR/RAWP. Information about it is fragmented in several places but is mostly contained in Appendix B, which is actually a description of contents of CVP. The text on page 2-4 states that the worker spends approximately 1,500 hours/y indoors and 500 hours/y outdoors. The only place you can get the real values are deep in table B-2 that describes the input parameters for RESRAD modeling. The actual values for the occupancy factors are 1445 hours indoors and 482 hours outdoors.

Specific Comment 2: Page 1-4 of the RDR/RAWP has a special section on the 618-4 burial ground that states that 618-4 will be cleaned up to 350 pCi/g and not to 267 pCi/g. Data reviewed to date indicates that the uranium levels at 618-4 do not exceed 267 pCi/g. If this is the case, 618-4 should not be exempted from the new cleanup value for uranium.

Specific Comment 3: The Remedial Action Goals and Remedial Action Guides listed in Appendix B are repetitive of what is in 2.1.1. Appendix B could reference the RAO and RAGs without restating them.

Specific Comment 4: Page B-6 addresses the evapotranspiration rate and states that vegetation and resurfacing will allow an evapotranspiration coefficient higher than 0.91. It should state up to 0.91. Page 2-5 correctly describes the 0.91 evapotranspiration coefficient.



Specific Comment 5: Page A-8 - Upgrade the description of the 618-4 burial ground status. Information should match what is in Table A-1 of the SAP.

Specific Comment 6: Page 2-2 describes the use of the 100 times rule from the old MTCA. Please explain that this version of the rule is still being used because of the timing of the ROD and the ARAR requirement. It should also be noted that site-specific modeling can also be used (consistent with the new version of MTCA) if the 100 times rule does not provide an appropriate groundwater protection evaluation for the site.

Specific Comment 7: The global edit from MTCA to WAC 173-340 in the RDR/RAWP is inconsistent with the ROD citation and cannot be made without an appropriate ROD modification. Let's discuss resolution.

Specific Comment 8: Section 3.6.5 of the RDR/RAWP: Do not strike the second to the last sentence of this section. It is a true statement.

Specific Comment 9: Last sentence of section 4.4.2 of the RDR/RAWP: add the text "If sample results do not indicate the area can be released for "unlimited use and unrestricted exposure," additional cleanup may be required to achieve these goals or the AOC may be expanded." A related edit should be made to the SAP to indicate the cleanup levels that will be used to evaluate "unlimited use and unrestricted exposure."