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APR 03 2002

0057090

02-RCA-0244

Mr. Michael L. Goldstein  
Acting Hanford Project Manager  
U.S. Environmental Protection Agency  
712 Swift Boulevard, Suite 5  
Richland, Washington 99352

RECEIVED  
APR 30 2002  
EDMC

Dear Mr. Goldstein:

RESPONSES TO U.S. ENVIRONMENTAL PROTECTION AGENCY (EPA) COMMENTS  
ON THE 200-MW-1 MISCELLANEOUS WASTE GROUP OPERABLE UNIT RI/FS WORK  
PLAN, DOE/RL-2001-65

56044

Please reference emails, C. Cameron to B. Foley, EPA Comments on 200-MW-1 Miscellaneous Waste Group Operable Unit RI/FS Work Plan, sent Wednesday, February 27, 2002, 2:30 p.m.; Friday, March 01, 2002, 2:33 p.m.; and Monday, March 04, 2002, 9:44 a.m.

Attached are the final responses to EPA comments on the Draft A "200-MW-1 Miscellaneous Waste Group Operable Unit RI/FS Work Plan," DOE/RL-2001-65. These comments were finalized based on a comment disposition meeting with EPA on March 11, 2001. Based on the attached comment responses, the U.S. Department of Energy expects to issue a redline version, incorporating the comment dispositions, by March 29, 2002.

Following EPA's agreement to the redlined changes, a final work plan will be issued within 30 days for approval by EPA. If you have any questions, please contact Bryan Foley at (509) 376-7087.

Sincerely,

Joel Hebdon, Director  
Regulatory Compliance and Analysis Division

RCA:JKY

Attachment

cc: See page 2

Mr. Michael L. Goldstein  
02-RCA-0244

-2-

APR 03 2002

cc w/encl:

B. H. Ford, BHI

M. J. Galgoul, CHI

R. Gay, CTUIR

J. S. Hertzell, FHI

O. S. Kramer, FHI

T. M. Martin, HAB

E. J. Murphy-Fitch, FHI

K. Niles, Oregon Energy

P. Sobotta, NPT

R. F. Stanley, Ecology

C. D. Wittreich, CHI

**Administrative Record**

EPA comments received 2/27/2002 via email:

## EPA COMMENTS ON THE 200-MW-1 WORK PLAN

- 1 Section 2.1.2, page 2-3, first complete sentence on page. The use of the word “alluvial” is an outdated usage. The word alluvial does not apply to subaqueous deposits as in a lake (lacustrine), but rather to sediments deposited by running water (according to Bates and Jackson’s 1987 *Glossary of Geology* 2<sup>nd</sup> Edition). Please rewrite paragraph to reflect this.

**Response:** Agree, text will be revised.

- 2 Section 2.2.3, first paragraph, second sentence. Add an “s” to the second “site” or at least a “(s).”

**Response:** Agree, text will be revised.

- 3 Section 2.2.3, first paragraph, last sentence. Don’t refer to these analogous sites as “not characterized.” Please mention that there is historical information and process knowledge on these sites.

**Response:** Agree, text will be clarified.

- 4 Section 2.2.3. Please mention the FS screening process for verifying that analogous sites match conceptual site models.

**Response:** Agree, text will be clarified.

- 5 Figure 2-3, page 2-21. The Hanford formation should have “formation” capitalized like the Ringold Formation. This correction needs to be made in other figures.

**Response:** The formation is an informal classification and, therefore, is not capitalized. No change.

- 6 Section 3.2, page 3-1. Should probably refer to the accumulation of radioactive contamination or material rather than radioactivity.

**Response:** Agree, text will be revised.

- 7 Section 3.3.6, page 3-6, second to last bullet on page. Are you sure the  $K_d$  for uranium is 1? The FS for CDI used 2 for the 200 Area.

**Response:** Agree, a  $K_d$  of 2 for uranium will be used.

8 Section 3.5, page 3-12, third bullet. What do you mean by “technically”?

**Response:** Text will be clarified.

9 Figure 3-15, page 3-27. Under the surface soils flow path, the ingestion, inhalation, and dermal contact pathways are listed as unlikely exposure pathways for the occasional user. I would submit that the exposure would be low, but that it isn't unlikely. The table and any affected text should be modified to reflect this.

**Response:** Agree, text will be clarified.

10 Table 3-1, page 3-29. Please provide text or a footnote that explains why some of the values are negative.

**Response:** Agree, text will be clarified.

11 Section 4.1.3. Please mention provisions for investigating lateral contamination that are in place and would be available for characterization at least by the FS stage.

**Response:** The remedial investigation is intended to focus on the distribution of contamination vertically and within the waste site. The lateral distribution of contamination outside the waste site boundary will be assessed as part of the confirmatory sampling/remedial design phase per the Implementation Plan. Section 5.6 will be clarified accordingly.

12 Section 4.1.4. Second to last sentence in section. You have the number of representative sites as four instead of five, please correct.

**Response:** Agree, text will be revised.

13 Section 5.0, page 5-1, first paragraph, second sentence. The figure number should be 5.1.

**Response:** The figure number is correct as it refers to Figure 1-1, Regulatory Process for the 200-MW-1 Operable Unit. The text will be clarified.

14 Section 5.0, page 5-1, second paragraph. Explain the provisions for dealing with contamination above action levels that are outside of the WIDS site boundaries but not outside the site in a general sense.

**Response:** See response to comment 11.

15 Section 5.0, page 5-1, second paragraph, last sentence. End of the sentence should read, “and post-ROD activities.”

**Response:** Agree, text will be revised.

16 Section 5.3.3. Why do we need another DQO?

**Response:** The DQO that was performed focused on data required to complete the CERCLA RI/FS process for the OU. The data needs required to complete the waste designation process for ERDF disposal has been handled (in the past for other OUs) as a separate DQO with decision statements that relate to the ERDF waste acceptance criteria. When the remedial investigation is ready to start, the waste control plan is finalized, with inputs from both the RI and IDW DQOs, and approved prior to the start field work. Waiting to approve the waste control plan until the field work is ready to start is prudent considering the fact that waste control requirements change with time (e.g., ERDF is currently working on rev. 4 to the disposal WAC).

17 Section 5.3.3, page 5-5, second paragraph, first sentence. The waste control plan is already prepared, just not finalized. You should point out that it is Appendix B of this work plan.

**Response:** The Implementation Plan identified that a waste control plan should be prepared as part of the work plan, and we have been doing so. The thinking at that time was that the RI would start fairly soon after the work plan is approved and approving the waste control plan with the work plan was appropriate. However, in the case of 200-MW-1, the RI is not scheduled to start until fiscal year 2004. It is recommended that the 200-MW-1 waste control plan be removed as an appendix to the work plan and finalized/approved just before the start of field work.

18 Section 5.3.3, page 5-5, second paragraph, third sentence. The waste control plan (possibly revised) would be in effect until you have a ROD and a waste management plan, not just for the RI.

**Response:** Agree, text will be clarified.

19 Section 5.3.5.3. This section is a little lite. It needs to include what industrial exclusive land use means for groundwater use and exposure pathways. Any additional clarification or detail might be helpful.

**Response:** Agree, text will be clarified.

20 Section 5.4. Please specify any sites that would be needing RCRA corrective action performance standards.

**Response:** All 200-MW-1 sites are CERCLA past practice (CPP) sites, and RCRA corrective action language does not apply. Text will be revised.

21 Section 5.5, page 5-9, first paragraph, second sentence. The Proposed Plan will identify the preferred alternative(s) for waste sites **within** the operable unit, not **for** the operable unit.

**Response:** Agree text will be revised.

- 22 Section 5.5, page 5-9, second bullet. Need to make sure that the decision point for transfer of sites to other operable units is timed so that it is not too late to include them in the other operable units' processes.

**Response:** Agree. Your approval of the work plan will provide the justification for a Tri-Party Agreement (TPA) Appendix C change request and an update of the Waste Information Data System (WIDS).

- 23 Section 5.6, page 5-9, first paragraph, first sentence. Not clear that there are any RCRA closure and corrective action requirements, if so, please be specific.

**Response:** All 200-MW-1 sites are CPP sites, and RCRA closure and corrective action language does not apply. Text will be revised.

- 24 Section 5.6. Why assume only one remedy will be needed?

**Response:** One remedy should not be assumed. The text will be clarified.

- 25 Figure 5-1, page 5-10. There needs to be more detail on how this works, this is confusing.

**Response:** Agree, will clarify.

- 26 Section 6.0. Please remove references to draft As. The products must be full revs.

**Response:** Agree, text will be revised.

- 27 Figure 6-1, page 6-2. Please remove the draft A references.

**Response:** Agree, text will be revised.

- 28 What are the estimated costs for RI work or at least for the types of activities that are planned?

**Response:** RI costs have not been included in other work plans. After the work plan is approved, the cost of the RI will be estimated as part of the detailed work plan (DWP) process.

## EPA Comments on the Sampling and Analysis Plan

- 29 Section A.3.2.2. What guides or determines the location used for establishing background?

**Response:** Text will be clarified.

- 30 Section A.3.3.1, page A-33, first full sentence. Add a "h" to make "were" change to "where."

**Response:** Agree, text will be revised.

31 Section A.3.3.1 page A-33, third full sentence. Change "As" to "At" and add a "the" in front of "Plio-Pleistocene."

**Response:** Agree, text will be revised.

32 Section A.3.3.1 page A-33, second paragraph. There is a sentence in here that has a parenthetical that says "as specified in the SAP." This is the SAP!

**Response:** Agree, text will be revised.

33 Section A.3.3.2, page A-34, last sentence on page. Why not collect samples for soil physical properties for the test pits?

**Response:** Agree, text will be revised.

34 Section A.3.3.2, page A-35, last sentence. Indicate that the waste control plan is Appendix B of this work plan.

**Response:** See response to comment 17.

35 Section A.5, last sentence of first paragraph. Indicate that the waste control plan is Appendix B of this work plan.

**Response:** See response to comment 17.

## EPA Comments on the Waste Control Plan

36 Site description section, first paragraph. Please give examples of what low volume and low concentration mean.

**Response:** Agree, text will be clarified.

37 Reference section, remove "Draft A" from the revision number and replace with "0."

**Response:** Agree, text will be revised.

38 Page B-2, drill/test pit site coordinate location. Why is it that you can spell out the locations here, but only provide a location for one of the representative sites in the SAP? Please be consistent.

**Response:** Agree, text will be revised.

39 Page B-5, Miscellaneous Solid Waste section, second sentence. Get rid of the "d" on "taped."

**Response:** Agree, text will be revised.

## EPA Comments on the Appendix C

40 Should have some text to describe this appendix. When do I get to review these WIDS sites?

**Response:** Agree, text will be clarified. The WIDS sites were contained in the TPA Appendix C update sent to EPA in December 2001.

41 Table C-5, page C-5, title. Add "for" before "this."

**Response:** Agree, text will be revised.

42 Table C-5, page C-25, sixth column from the left. Misspelled ruthenium.

**Response:** Agree, text will be revised.

## EPA Comments Received 3/1/2002 via Email

- **Comment:** I was looking at the 200-MW-1 work plan table on decision rules and noticed there is an inconsistency (believe it is DR #2) with the 200-PW-1 work plan's table. What is the rationale for using 15 - 100 mrem for MW-1 while using 15 - 500 mrem PW-1? We believe they should be the same and want to know which scenario drives the upper bound for clarification.

**Response:** Agree, text will be revised from 100 to 500 mrem.

- **Comment:** My other comment has to do with the analytical requirements. Please see my second comment on the 200-CW-5 redline of the SAP. The comment is in a file attached to the message on CW-5 review. Please clarify.

Second comment on the 200-CW-5 SAP redline is as follows:

*Table A2-1. I reassert my concern about the changes to some of the analytical requirements. It seems odd that we go through a rigorous DQO process only to have the laboratory requirements changed based on your new contract with the laboratory. The requirements should be driven by the data quality necessary for the remedial investigation. The changes you make with respect to your laboratory requirements have broader ramifications than just this operable unit. All involved parties should get together to discuss these ramifications soon.*

**Response:** There are a couple of contaminants of concern (COCs) in Table A-7 where the lab detection limit for soil is higher than the calculated groundwater protection action level. Soil cleanup levels (preliminary action levels) for protection of groundwater are.

calculated using the MTCA Fixed Parameter Three-Phase Partitioning Model Equation for Soil Protection of Ground Water (WAC 173-340-747(4)). MTCA Method B drinking water standards or MCLs from 40 CFR 141 are used, as appropriate, as inputs to perform the calculation. In cases where the soil cleanup level for protection of groundwater calculated using the MTCA equation is less than the level that can be reliably measured (i.e., detection limit), the soil cleanup level shall be established at a concentration equal to the practical quantitation limit (PQL) per WAC 173-340-700(6)(d). As a result, if a calculated groundwater protection action level is less than the soil detection limit, the calculated value will be replaced with the analytical detection limit. Table A-7 will be revised accordingly. Footnotes will be provided for clarification.

### EPA Comments Received 3/4/2002 via Email

- **Comment:** I have a couple more comments about analytical performance requirements. I would like you to have the work plan's SAP section checked to make sure that all of the detection limits are below the action levels. After that, please make sure that you are set up with your laboratory to actually meet those detection limits.

**Response:** See response to above comment.