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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

3100 Port of Benton Blvd • Richland, WA 99354 • (509) 372-7950

August 4, 2009

Mr. Mark S. French, Program Manager
Richland Operations Office
United States Department of Energy
P.O. Box 550, MSIN: A3-04
Richland, Washington 99352

Re: Transmittal of the Signed Waste Site Reclassification Form for the Remaining Sites Verification Package (RSVP) for 100-H-28:1 and Documentation of the Department of Ecology's (Ecology) Comparison of Site Data with Washington Administrative Code (WAC) 173-340 (2007) Requirements

Dear Mr. French:

Enclosed is the signed TPA-MP-14 Waste Site Reclassification Form (enclosure 1) for the 100-H-28:1, Powerhouse Ash Sluicing Pipeline for interim reclassification to "no action." Ecology's approval of this interim reclassification is based on the requirements for waste site reclassification identified in the *Remedial Design Report/Remedial Action Work Plan for the 100-Area*, DOE/RL-96-17, Revision 5, which identifies WAC 173-340 (1996) cleanup levels.

In anticipation of the final Record of Decision (ROD) for the 100-H Area, we now evaluate data for consistency with corrective action requirements that will be updated within the final ROD. Therefore, we compared the data in the RSVP for 100-H-28:1 against WAC 173-340 (2007) requirements (enclosure 2). Ecology will consider this evaluation when the 100-H-28:1 waste site is evaluated for final reclassification under the final ROD.

If there are any questions, contact Jacqueline Shea at 509-372-7925 or me at 509-372-7916.

Sincerely,

Mandy Jones
Acting Environmental Restoration Project Manager
Nuclear Waste Program

js/aa
Enclosures (2)

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cc: See page 2

100-BC-1
100-DC-2
100-DR-1

100-DR-2 100-HR-2 100-KL-2
100-FL-1 100-KR-1 100-IL-6
100-HR-1 100-KR-2 200-CW-3



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Mr. Mark S. French
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cc w/enc:

Joanne Chance, USDOE
John Neath, USDOE
Megan Proctor, WCH
Stuart Harris, CTUIR
Gabriel Bohnee, NPT
Russell Jim, YN
Susan Leckband, HAB
Ken Niles, ODOE
Administrative Record: 100-H Area
Environmental Portal
Hanford Operating Record General File
USDOE-RL Correspondence Control

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Date Submitted: <u>07/13/09</u> Originator: <u>M. L. Proctor</u> Phone: <u>372-9227</u>	WASTE SITE RECLASSIFICATION FORM		Control Number: 2006-020
	Operable Unit(s): <u>100-HR-1</u>	Waste Site Code: <u>100-H-28:1</u>	
	Type of Reclassification Action: Closed Out <input type="checkbox"/> Interim Closed Out <input type="checkbox"/> No Action <input checked="" type="checkbox"/> RCRA Postclosure <input type="checkbox"/> Rejected <input type="checkbox"/> Consolidated <input type="checkbox"/>		

This form documents agreement among parties listed authorizing classification of the subject unit as Closed Out, Interim Closed Out, No Action, RCRA Postclosure, Rejected, or Consolidated. This form also authorizes backfill of the waste management unit, if appropriate, for Closed Out and Interim Closed Out units. Final removal from the NPL of No Action and Closed Out waste management units will occur at a future date.

Description of current waste site condition:

The 100-H-28:1 waste site, part of the 100-HR-1 Operable Unit, encompasses the 0.2 m (8-in.) pipeline formerly used for sluicing ash from the 184-H power house to the 126-H-1 ash pit. The total length of the pipeline is approximately 265 m (870 ft), and exists approximately 1.5 m (5 ft) below existing grade. The primary operational period of the 100-H-28:1 pipeline is expected to coincide with that of the reactor and its support facilities, from 1949 to 1965.

Confirmatory sampling of the 100-H-28:1 waste site was conducted to determine a No Action or Remedial Action decision in accordance with the remedial action objectives and goals established by the *Interim Action Record of Decision for the 100-BC-1, 100-BC-2, 100-DR-1, 100-DR-2, 100-FR-1, 100-HR-1, 100-HR-1, 100-HR-2, 100-KR-1, 100-KR-2, 100-IU-2, 100-IU-6, and 200-CW-3 Operable Units, Hanford Site, Benton County, Washington (Remaining Sites ROD)*, U.S. Environmental Protection Agency, Region 10, Seattle, Washington.

Basis for reclassification:

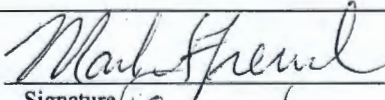
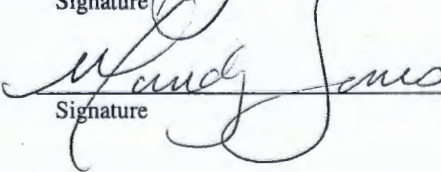
The 100-H-28:1 waste site confirmatory sampling results support a reclassification of this site to No Action. The current site conditions achieve the remedial action objectives and the corresponding remedial action goals established in the Remaining Sites ROD. The results of confirmatory sampling show that residual contaminant concentrations do not preclude any future uses (as bounded by the rural-residential scenario) and allow for unrestricted use of shallow zone soils (i.e., surface to 4.6 m [15 ft] deep). The results also demonstrate that residual contaminant concentrations are protective of groundwater and the Columbia River. This site does not have a deep zone component; therefore, institutional controls to prevent uncontrolled drilling or excavation into the deep zone are not required. The basis for reclassification is described in detail in the *Remaining Sites Verification Package for the 100-H-28:1, 184-H Power House Ash Sluicing Line* (attached).

Regulator Comments:

Approval of this WSRF documents regulator agreement that the 100-H-28:1 waste site qualifies for "No Action" under the Interim Action ROD. In addition, Ecology has evaluated the data for this site against WAC 173-340 (2007) clean-up levels for direct contact, groundwater protection, and river protection. This evaluation is documented in the letter transmitting Ecology's approval of this site's interim reclassification to "no action."

Waste Site Controls:

Engineered Controls: Yes No Institutional Controls: Yes No O&M requirements: Yes No
 If any of the Waste Site Controls are checked Yes specify control requirements including reference to the Record of Decision, TSD Closure Letter, or other relevant documents.

M. S. French		7/17/09
DOE Federal Project Director (printed)	Signature	Date
J. B. Preece M. E. Jones		7/28/09
Ecology Project Manager (printed)	Signature	Date
N/A		
EPA Project Manager (printed)	Signature	Date

Enclosure 2

The Department of Ecology's Comparison of Supporting Data for the 100-H-28:1 Remaining Sites Verification Package (RSVP) with WAC 173-340 (2007) Requirements

Overall summary: Additional cleanup not required based on WAC 173-340 (2007) cleanup levels; however, further evaluation of contaminants exceeding ecological risk screening values is necessary for final reclassification.

Summary of Exceedences (Yes = concentration exceeds cleanup/screening level):

Contaminant	Groundwater Protection (1996)	River Protection (1996)	RESRAD (Kd ml/g)	State Ecological Risk	WAC 173-340 (2007)
Barium	Yes	Yes	Pass (22)	Yes	No
Boron	No	No	--	Yes	No
Copper	No	Yes	Pass (22)	No	No
Vanadium*	No	No	--	Yes*	No
Benzo(b)fluoranthene	Yes	Yes	Pass (22)	No	No
Ideno(1,2,3-cd)pyrene	Yes	Yes	Pass (22)	No	No

*<background

Note: Because the cleanup level defaults to background or the PQL, this table does not include contaminants with soil concentrations below background or the RDL, unless ecological risk is exceeded.

- Using WAC 173-340-747 (2007), Ecology's evaluation shows that risk from the pathway to groundwater does not affect the results of this RSVP.
- State ecological risk screening levels were exceeded for vanadium (<background), barium, and boron. An EPA screening level was exceeded for manganese (<background). These exceedences require additional evaluation.
- Groundwater and/or river protection concentrations per WAC 173-340 (1996) are exceeded for barium, copper, benzo(b)fluoranthene, and ideno(1,2,3-cd)pyrene; however, concentrations do not exceed WAC 173-340 (2007) cleanup levels.