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Tri-Party Agreement Implementation
State of Washington
Department of Ecology
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Dear Messrs. Sherwood and Stanley:

SUBMITTAL OF THE LIMITED FIELD INVESTIGATION (LFI) REPORT FOR THE 100-BC-5 OPERABLE UNIT (OU), DRAFT A (DOE/RL-93-37) AND THE QUALITATIVE RISK ASSESSMENT (QRA) FOR THE 100-BC-5 SOURCE OU (WHC-SD-EN-RA-006, REV. 0) 29007

Enclosed please find the subject LFI Report (enclosure 1) and QRA (enclosure 2) submitted by the U.S. Department of Energy, Richland Operations Office (RL), to the U.S. Environmental Protection Agency (EPA) and the State of Washington Department of Ecology (Ecology) for review. Submittal of the 100-BC-5 OU LFI Report to EPA and Ecology by August 31, 1993, completes Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) Interim Milestone M-15-09B. The 100-BC-5 OU QRA is provided to facilitate review of the LFI Report. As an LFI Report is roughly analogous to a Phase I Remedial Investigation (RI) Report, defined in Table 9-2 of the Tri-Party Agreement Action Plan as a secondary document, RL requests EPA comments (as the lead regulatory agency for the 100-BC-5 OU) by October 15, 1993.

RL, EPA, and Ecology agreed to the unique concepts of LFIs and QRAs when adopting the Hanford Site Past-Practice Strategy (HSPPS) for use in September 1991 to create a bias for action. An LFI is an effort to collect limited additional site data which are sufficient to support a decision on conducting expedited response actions or interim remedial measures (IRMs). A QRA is a characterization of risk to human health and the environment associated with waste site contamination not based solely on quantification using existing and available site data. Preparation of an OU specific QRA is a task incorporated in the corresponding OU specific LFI Report. Since September 1991, RL, EPA, and Ecology have worked together on a daily basis to implement HSPPS and conduct LFIs at Hanford.

The purpose of the 100-BC-5 OU LFI Report is for RL to recommend whether groundwater underneath the 100 BC Reactor Area continues to be a candidate for an IRM since completion of the 100-BC-5 OU LFI. This LFI Report, one of the first of its kind, is a compilation and evaluation of data collected from

completion of various tasks as identified in the 100-BC-5 OU RI/Feasibility Study Work Plan (approved by EPA on August 4, 1992). With this data, and a summary of the associated 100-BC-5 OU QRA, the LFI Report provides a basis for making a defensible recommendation on 100-BC Reactor Area groundwater IRM candidacy.

RL recommends that groundwater in the 100-BC-5 OU be removed from continued IRM candidacy at this time. Because evaluation 100-BC-5 OU LFI data confirm occurrence of groundwater contamination from past activities in the 100-BC Reactor Area, RL recommends continued monitoring of key groundwater contaminants until remedial action of potential contaminant sources is complete. An IRM may be recommended at a later date if warranted due to adverse change of 100-BC Reactor Area groundwater conditions.

Please address any comments or questions regarding this correspondence or Hanford Site 100 Area past-practice environmental investigations to Mr. Eric Goller on (509) 376-7326.

Sincerely,

Steven H. Wisness
Hanford Project Manager

ERD:EDG

Enclosures: As stated

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Subject: SUBMITTAL OF THE LIMITED FIELD INVESTIGATION (LFI) REPORT FOR THE 100-BC-5 OPERABLE UNIT (OU), DRAFT A (DOE/RL-93-37) AND THE QUALITATIVE RISK ASSESSMENT (QRA) FOR THE 100-BC-5 SOURCE OU (WHC-SD-EN-RA-006, REV. 0)

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