0054490

Department of Energy
Richland Operations Office
P.O. Box 550
Richland, Washington 99352

01-ERD-029

FEB 5 2001

Ms. Jane A. Hedges
Perimeter Areas Section Manager
Nuclear Waste Program
State of Washington
Department of Ecology
1315 W. Fourth Avenue
Kennewick, Washington 99336

RECEIVED
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EDMC

Dear Ms. Hedges:

HANFORD FEDERAL FACILITY AGREEMENT AND CONSENT ORDER (TRI-PARTY AGREEMENT) CHANGE REQUEST M-16-01-02, EXTEND COMPLETION DATE FOR TRI-PARTY AGREEMENT INTERIM MILESTONE M-16-26C

The enclosed Tri-Party Agreement Change Request proposes a four-month extension for the completion of Tri-Party Agreement Interim Milestone M-16-26C, Complete Remediation and Backfill of 10 Liquid Waste Sites and Process Effluent Pipelines in the 100-HR-1 Operable Unit as defined in the Remedial Design Report/Remedial Action Work Plan for the 100 Area. This extension is necessary due to the elevated arsenic and chromium contamination found. Wayne Soper, of your staff, reviewed the draft change request. In addition, this letter and change request fulfills the 110-day notification required by Tri-Party Agreement, Part Two, Article VIII, paragraph 30.f.

Comments or concerns should be directed to Douglas Smith, Environmental Restoration Division, at (509) 372-1544 or Jon Yerxa, Regulatory Liaison, at (509) 376-9636.

Sincerely,

Clifford E. Clark, Acting Program Manager
Office of Regulatory Liaison

ERD:DCS

Enclosure

cc: See page 2

Change Number	Federal Facility Agreement and Consent Order	Date
M-16-01-02	**Change Control Form** Do not use blue ink. Type or print using black ink.	January 15,2001

Originator
D. C. Smith
DOE/RICHLAND OPERATIONS-ENVIRONMENTAL RESTORATION PROJECT

Phone
(509) 372-1544

Class of Change

[ ] I - Signatories [X] II - Executive Manager [ ] III - Project Manager

Change Title

1) Extend Completion Date for Tri-Party Agreement Interim Milestone M-16-26C

Description/Justification of Change

The 100-HR-1 TPA milestones are applicable to Hanford's Environmental Restoration Program for the 100 Area Remedial Action. TPA milestone M-16-26C "Complete 10 waste sites and the process effluent pipelines in 100-HR-1" was extended to 5/31/01 (reference TPA change notice M-16-99-02).

During the closeout sampling process elevated arsenic and chromium contamination was found. Literature and historical photo searches were conducted to determine the source of the contamination. Results indicate that arsenic was not used within any process at the 100-HR Reactor Area. Historical documents indicate that lead arsenate was used as a pesticide on pre-Hanford agricultural land areas. Soil samples were collected from areas within the 100 HR area, outside of waste sites and in known agricultural areas. Results confirmed the presence of arsenic. The additional research, sampling and discussions with Regulators delayed closeout-sampling activities for approximately two months. Chromium was used in processes at the 100-HR Reactor Area. This issue was addressed previously at the 100D/DR Reactor Area, at first by attempting to remove the chromium-contaminated soils but the remedial action goal of 2.0 mg/kg could not be achieved. A leachate study was performed to identify the impact to ground water as a result of this elevated contamination (this RAG is for protection of ground water). The D/DR Reactor Area Study confirmed that the chromium would not leach into the ground water. RL proposed to Ecology that a leachate study, similar to that performed for the D/DR reactor area, be conducted for the HR Reactor Area; Ecology concurred with the proposal. The resolution of these two issues resulted in additional work and necessitated a four-month extension for completion of this workscope.

~~Strikethrough~~ indicates text to be removed, shading indicates text to be added:

M-16-26C	Complete Remediation and Backfill of 10 Liquid Waste Sites and Process Effluent Pipelines in the 100-HR-1 Operable Unit as defined in the Remedial Design Report/Remedial Action Work Plan for the 100 Area.	~~5/31/01~~ 9/30/01

Impact of Change

Milestone initiation and completion dates require changes. No other impacts can be identified. The intention is to have ongoing remediation continuing in the Hanford 100 Area Operable Units.

Affected Documents

Hanford Federal Facility Agreement and Consent Order Action Plan.
Remedial Design Report/Remedial Action Work Plan for the 100 Area.

Approvals

W. Wade Ballard DOE	2/1/01 Date	✓ Approved ____ Disapproved
EPA	Date	____ Approved ____ Disapproved
Ecology	Date	____ Approved ____ Disapproved

cc w/encl:
V. R. Dronen, BHI
J. R. Green, BHI
T. F. Kisenwether, BHI
D. N. Larue, BHI
J. H. Richards, CTUIR
J. Price, Ecology
W. W. Soper, Ecology
R. F. Stanley, Ecology
M. A. Wilson, Ecology
D. R. Sherwood, EPA
J. S. Hertzel, FHI
O. S. Kramer, FHI
T. M. Martin, HAB
R. Sobotta, NPT
M. L. Blazek, Oregon Energy
R. Jim, YN
Admin Record, H6-08 (100-H)