

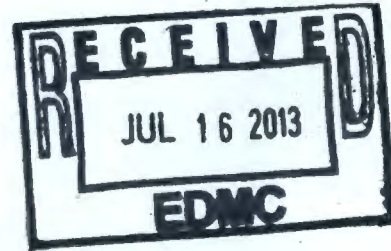
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
HANFORD/INL PROJECT OFFICE
309 Bradley Boulevard, Suite 115
Richland, Washington 99352

July 15, 2013



Jonathan A. Dowell, Assistant Manager
for the River and Plateau
Richland Operations Office
U.S. Department of Energy
P.O. Box 550
Richland, Washington 99352

Re: U.S. Environmental Protection Agency (EPA) Comments on the 200-UP-1 Groundwater Operable Unit Remedial Design/Remedial Action Work Plan (DOE/RL-2013-07), Draft B

1220806

Dear Mr. Dowell,

The U.S. Environmental Protection Agency (EPA) has reviewed the 200-UP-1 Groundwater Operable Unit Remedial Design/Remedial Action Work Plan, Draft B, received on June 14, 2013, which addressed comments from our previous letter dated April, 20, 2013. While a portion of the comments were addressed in Draft B of the document, DOE failed to resolve several of our comments.

To address minor issues remaining in the document, EPA would like to meet with DOE to discuss how the description of compliance monitoring versus performance monitoring can be clarified. The next minor issue is language that suggests sampling and analysis plans (SAPs) should be part of the Performance Monitoring Plan (PMP), which is a secondary document. EPA's stance is that SAPs are part of the Work Plan, which is a primary document, and should not be described as part of the PMP. All SAPs associated with remedial action on the 200-UP-1 OU should be part of the RD/RA Work Plan.

Two major issues with the document are the high cost estimates and the proposed implementation schedule. The cost estimates in this document are significantly higher, partially based on the fact that Draft A was based on a 30% design for the Remedial Design Report (RDR), which EPA commented should be based on a 90% design, as outlined in Section 7 of the TPA Action Plan. The Draft A estimate of \$1.8M for the remedial design and RDR was increased to \$3.8M in Draft B. This cost seems unreasonable considering the design for the 200-UP-1 remedy is very similar to the 200-ZP-1 OU remedy, which is already operational and using the 200 West Treatment Facility. Table 7-1 of the document lists separate costs for the installation of monitoring, injection, and extraction wells, which appear to be separate from the design costs. EPA is highly concerned with these costs and would like to meet with DOE to discuss the issue in detail.

EPA is still highly concerned with the remedy implementation schedule proposed in the document. EPA commented that the proposed schedule in Draft A, which would delay all well installation of the pump-and-treat remedy component until fiscal year (FY) 2016 through FY 2018, was unacceptable. DOE has failed to respond to EPA's comment which states that all wells for the 200-UP-1 remedy will be drilled in FY 2014 through FY 2015 and all injection and extraction wells will be connected to the 200 West Pump-and-Treat facility by FY 2016. The schedule proposed in Draft B lists drilling of the U Plant Area

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injection/extraction wells and the iodine-129 plume injection wells in FY 2016 followed by remedial system operations beginning in FY 2017. For the southeast chromium plume, the proposed schedule lists characterization wells being drilled in FY 2016, remedial design in FY 2017, and injection/extraction well drilling in FY 2018. EPA is concerned that the proposal to drill all injection/extraction wells for the pump-and-treat component of the 200-UP-1 remedy in FY 2016 is not realistic and questions whether DOE can ensure the funds to undertake these actions in a single fiscal year.

Remediation of groundwater at the Hanford Site remains a top priority for EPA and citing budget constraints as a cause of a delay in schedule is not acceptable. Drilling of wells associated with the 200-UP-1 remedy should take priority and be funded over other work at the Hanford Site. EPA expects all well installation of the pump-and-treat remedy component to be operational by FY 2016, meaning all wells should be drilled during FY 2014 and FY 2015. A meeting was held on July 11, 2013 to discuss EPA's concerns with DOE. Although progress was made at the meeting, DOE was not able to commit to a schedule acceptable to EPA. As a result, we are initiating informal dispute. I am hopeful we can resolve the schedule issue at the project manager level.

For questions or comments, please contact me at laija.emerald@epa.gov or at (509) 376-4919.

Sincerely,



Emerald Laija
Remedial Project Manager

Enclosure

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