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

01-RCA-306

JUL 23 2001

Mr. Michael A. Wilson, Program Manager
Nuclear Waste Program
State of Washington
Department of Ecology
P.O. Box 47600
Olympia, Washington 98504

AUG 01 2001

EDMC

Dear Mr. Wilson:

TRANSMITTAL OF 200-PW-2 URANIUM-RICH PROCESS WASTE GROUP OPERABLE UNIT (OU) REMEDIAL INVESTIGATION/FEASIBILITY STUDY (RI/FS) WORK PLAN AND PROCESS WASTE RESOURCE CONSERVATION AND RECOVERY ACT (RCRA) TREATMENT, STORAGE, AND DISPOSAL (TSD) UNIT SAMPLING PLAN, DOE/RL-2000-60, REVISION 0

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The 200-PW-2 Uranium-Rich Process Waste Group Operable Unit RI/FS Work Plan and Process Waste RCRA TSD Unit Sampling Plan, DOE/RL-2000-60, Revision 0, is attached (Attachment 1). Comments from the State of Washington, Department of Ecology (Ecology) and the Nez Perce Tribe were dispositioned, incorporated as appropriate and are included as Attachments 2 and 3. In addition, a copy of Revision 0 of the Remedial Investigation Data Quality Objectives Summary Report for the 200-PW-2 Uranium-Rich Process Waste Group Operable Unit, BHI-01411, Revision 0 is included as Attachment 4.

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This work plan is the fifth in a series of several which follow the approach outlined in the "200 Areas RI/FS Implementation Plan, Environmental Restoration Program," for characterization and remediation in the 200 Areas. The work plan contains the elements of a Comprehensive Environmental Response, Compensation and Liability Act of 1980 RI/FS work plan and RCRA TSD unit sampling plan. A sampling and analysis plan accompanies the work plan as an appendix.

The final draft of the Federal Facility Agreement and Consent Order (Tri-Party Agreement) Change Request (CR) M-15-00-06 is included as Attachment 5. This change request proposes Tri-Party Agreement Interim Milestones be negotiated between the U.S. Department of Energy, Richland Operations Office (RL) and Ecology. These proposed interim milestone dates are consistent with the major milestone to complete the 200 Area OU RI/FS process by 2008 (M-15-00C). The completion date for proposed Interim Milestone M-15-43C exceeds the compliance date for the associated M-20 major milestone. Because a Tri-Party Agreement Major Milestone is impacted, a Class I Tri-Party Agreement Change Request will be developed and undergo public review. In the spirit of good faith negotiations, a formal commitment for submittal of a draft Class I Change Request addressing the impact to Tri-Party Agreement Major Milestone M-20 will be submitted by August 31, 2001.

JUL 23 2001

After discussions with Ecology and the U.S. Environmental Protection Agency (EPA) on ways to further streamline 200 Area assessment planning, two additional RCRA TSD units were added into the RI/FS process as part of the 200-PW-2 OU. This more focused approach was also discussed on April 23, 2001, with EPA and Ecology staff representatives during the annual review of 200 Area work scope priorities. As a result of this meeting, Ecology agreed that the assessment of the 216-A-37-1 Crib and 207-A South Retention Basin RCRA TSD units (from the 200-PW-4 General Process Waste Group) may be addressed as part of the 200-PW-2 OU work plan to accelerate the investigation of all process waste-type RCRA TSD units. A separate Sampling and Analysis Plan will be prepared for these two RCRA TSD units; the implementation of which will be integrated with the 200-PW-2 RI. Furthermore, the TSD units will also be incorporated into subsequent RI/FS documents under the 200-PW-2 OU. Incorporating these TSD's into the 200-PW-2 work plan provides further justification for requesting modification of the existing M-20 milestones to allow for coordination of field activities, and to be consistent with the 200-PW-2 proposed milestone identified as M-15-43C in the attached M-15-00-06 TPA change request.

As a result of a June 20, 2001, meeting held with Ecology, RL will transmit the final draft 200-PW-2 work plan, along with a draft Tri-Party Agreement Change Request signed by RL proposing the interim milestones under M-15 to complete the pre-ROD investigation of the 200-PW-2 OU. Additionally, RL will accept a Tri-Party Agreement commitment to transmit two draft change requests to both EPA and Ecology by August 31, 2001. The first change request will propose modification of M-20 (both the major milestone and the associated interim milestones), and the second will propose modifying M-13-00L (submit three 200 Area NPL work plans by December 31, 2001).

The M-13-00L change request will begin to align the remaining M-13 series Tri-Party Agreement milestones with RL's alternate baseline approach. This focuses on completing 12 of the 22 remaining OU assessments by 2008 in order to obtain the data necessary to establish a framework of remedial decisions. These decisions are to be applied to the 200 Area non-tank farm-related OUs.

If you have any questions, please contact Alex Teimouri, RL Regulatory Compliance and Analysis Division, (509) 376-6222, or Bryan Foley, RL Environmental Restoration Division (509) 376-7087.

Sincerely,



Joel Hebdon, Director
Regulatory Compliance and Analysis Division

RCA:AET

Attachments

cc: See Page 3

Mr. Michael Wilson
01-RCA-306

-3-

cc w/o attach:

B. H. Ford, BHI
M. J. Graham, BHI
C. D. Wittreich, BHI
R. Gay, CTUIR
R. R. Skinnarland, Ecology
R. F. Stanley, Ecology
J. S. Hertzell, FHI
O. S. Kramer, FHI
E. Murphy-Fitch, FHI
T. M. Martin, HAB
P. Sobotta, NPT
M. L. Blazek, Oregon Energy
R. Jim, YN

cc w/attach:

J. Price, Ecology
D. R. Sherwood, EPA
L. C. Treichel, EM-442
Administrative Record

**Responses to Washington State Department of Ecology Comments on the
200-PW-2 Uranium-Rich Process Waste Group Operable Unit RI/FS Work Plan
and RCRA TSD Unit Sampling Plan, DOE/RL-2000-60, Draft A**

General Comments

1. Some portions of the work plan would be difficult to grasp by individuals not very familiar with Hanford, e.g., the reference to "West Lake" on page 2.4 that doesn't correlate with a figure showing West Lake. This issue doesn't materially affect the regulatory compliance of the work plan, but some specific comments are provided to improve the layman's ability to understand the work plan.

Response: Acknowledged. Please see the response to the specific comments.

2. The treatment of perched groundwater is incomplete. The Executive Summary (pg. ES-3) states that "lateral spreading of liquids and contaminants was limited." The Background and Setting (pg. 2-4) contains a couple of cursory references (one implied) to perched groundwater. Perched groundwater could potentially spread contamination laterally for substantial distances beyond nominal waste site boundaries. The work plan doesn't include enough information to explain the significance of perched groundwater. Additional explanation should be added for clarity.

Response: Acknowledged. For this stage of the RI/FS process the focus of the RI is to determine the vertical contaminant profile within the waste site, and it is not necessary to completely understand the extent to which perched groundwater might have contributed to lateral spreading. During the subsequent remedial design stages it may be deemed prudent to obtain additional information. This additional sampling could occur during the confirmation or verification sampling stages described in the 200 Areas Implementation Plan (Sections 2.4 and 2.5), and Section 5.5 of this work plan. The first part of the first bullet on page ES-3 will be rewritten as follows: "Effluent and contaminant migration is predominantly vertical beneath the waste sites after release. Lateral spreading of liquids and contaminants may have occurred in association with"

3. The Department of Ecology made comments on other 200 Area work plans indicating the need for a better approach to ecological assessment. Certain information in this work plan reinforce that concern. For example, the description of UPR-200-W-163 is that (Table 2-1):

"An unplanned release that consisted of radiologically contaminated vegetation growing above the buried pipeline to the 216-U-8 crib."

The Department of Ecology has previously discussed with DOE that a comprehensive approach to ecological assessment is required for the 200 Area. Discussions are currently underway to define that approach. Accordingly, the Department of Ecology will not ask for ecological assessment to be addressed for 200-PW-2 at this time. We reserve the right to ask for Operable Unit-specific information at a later date.

Response: Acknowledged. Note that Table 2-1 also states that the area of this unplanned release was interim stabilized in 1995.

Specific Comments

Comment #	Section/ Page/ Paragraph/ Sentence	Comment
1.	ES-3, 1 st bullet pg. 2-3 et al.	The designation of the "Hanford formation/Plio-Pleistocene unit (?)" is not consistent with standard geological naming conventions . . . what entity "referred to" it that way?
Response: Wood et.al (2000), as cited in Section 2.1.2, is the source of the definition and use of this term, and is considered as the most recent description of geology in the 200 Areas.		
2.	ES-3, 3 rd bullet	Change "local significant" to "significant local"
Response: Accepted.		
3.	ES-3, 3 rd bullet	Change "elevated levels" to "local accumulations"
Response: Accepted.		
4.	ES-3, last paragraph	Expand on "Potential human receptors include current and future site workers." That's true for the area "inside the fence" designated for industrial land use, and where it is assumed that groundwater use will be restricted. For the area "outside the fence" the groundwater exposure pathway would include non-workers at >50 years in the future.
Response: Acknowledged. As stated in the text, evaluation of future impacts to humans depends upon land use designations which are still being discussed by the Tri-Parties. Protection of groundwater will be addressed by remedial action objectives developed in the feasibility study process which follows the remedial investigation.		
5.	ES-3, last paragraph	Recommend replacing the last 2 sentences: "The type of future land use . . . (DOE 1999b).": with something like - "Future land use for the foreseeable future (approximately 50 years) is industrial based on the <i>Final Hanford Comprehensive Land-Use Plan Environmental Impact Statement</i> (DOE 1999a) and the associated <i>Record of Decision: Hanford Comprehensive Land-Use Plan Environmental Impact Statement</i> (64 FR 218). All of the sites within the 200-PW-2 OU are located within the area designated for industrial land use." Update the citation DOE 1999b in the references to a Federal Register citation (64 FR 218, Page 61615-61625).
Response: Accepted.		
6.	ES-4, 1 st sentence	Please rewrite the first sentence which is passive tense and awkward.
Response: Accepted.		
7.	ES-4, 2 nd sentence	Change "Soil sample analysis will be conducted by either an onsite or by an offsite laboratory under a contract-required quality program." to "A laboratory (either on- or off the site) will complete soil sample analysis under a contract-required quality program."
Response: Accepted.		
8.	Table ES-1	Change "Maximum number of vadose soil samples" to "Projected maximum number of vadose zone samples"

Comment #	Section/ Page/ Paragraph/ Sentence	Comment
		<i>The Department of Ecology notes (and endorses) the statement on page 4-5 that: "Additional samples may be collected at the discretion of the geologist/sampler based on field screening and geologic information (e.g., changes in lithology.)"</i>
Response: Accepted.		
9.	1-1, 3 rd ¶	There are technically only <u>three</u> (not four) Hanford Site areas on the NPL now that the 1100 Area has been removed from the NPL. The ERC should consider revising this statement on a global basis.
Response: Accepted. The sentence will be revised to read "The 200 Areas is one of three areas on the Hanford Site that remain on the"		
10.	1-1, 3 rd ¶	Considering revising 4 th sentence as: "This was subsequently updated by <u>using information in the Waste Information Data System (WIDS) . . .</u> "
Response: Accepted.		
11.	1-1, 4 th ¶	For clarity to the layman, please change "Of the 23 source OUs" to "Of the 23 source OUs in the 200 Area"
Response: Accepted.		
12.	1-1, 4 th ¶	Change "sties" to "sites"
Response: Accepted.		
13.	1-1, 4 th ¶	Change "required" to "require" or "have TPA-required"
Response: Accepted. "Have TPA-required" will be used.		
14.	1-2, 3 rd ¶, last sentence	Delete the parenthetical sentence "(This date . . . feasibility study)."
Response: No change. (This same statement is also found in Section 6.0.) The date for submittal of the closure plan is presently 14 months prior to the submittal date for the FS/Closure Plan as shown on Figure 6-1. Discussions regarding modification of this TPA Milestone (M-20-33) have not been completed. Until such time as draft change request (M-15-2000-6) for establishing project milestones, and a subsequent change request (M-20-2001-x) for modifying the closure plan submittal have been approved, the statement given in the text is appropriate.		
15.	Section 1.1, 2 nd ¶ et seq.	<ul style="list-style-type: none"> The Dept. of Ecology provided comments on the Implementation Plan subsequent to its approval, including comments on ARARs. This reference to the ARARs in the IP therefore requires either a revision of the IP, or, inclusion in this work plan of relevant changes to the IP information. Note that revision of the IP would require a global update to its citation and a revision to the reference.
Response: The comments provided on the Implementation Plan regarding the potential ARARs discussion are acknowledged. As stated in Section 5.3 of the work plan (1 st bullet on page 5-10 of Draft A) it is one of the functions of the FS to "provide a detailed evaluation of ARARS, beginning with potential ARARs identified in the Implementation Plan". It is appropriate to address the comments that were recently provided at the FS stage of the process. It is not necessary to include those changes in the work plan since there is no detailed presentation of ARARs required at that time. As a point of clarification the following statement will be added to the end of the 2 nd paragraph in Section 5.1 on page 5-2 of Draft A of the work plan: "The FS will also include further evaluation and refinement of ARARs that were identified in the Implementation Plan."		
16.	Sec. 1.2, 1 st ¶	Capitalization & lower-case usage of "Permit" in the same sentence seems inconsistent.
Response: No change. The usage is appropriate in the context of the sentence.		
17.	Section 2.1	Fix variation in fonts.
Response: Accepted.		
18.	Sections 2.1	Description of Cold Creek Bar elevation as 650 to 750 ft amsl seems

Comment #	Section/ Page/ Paragraph/ Sentence	Comment
	and 2.1.1	inconsistent with elevations cited in Section 2.1.1 (620 ft and 755 ft, respectively).
Response: Accepted. The high end elevation of the Cold Creek Bar has been modified to 230 m (755 ft) to be consistent with the source reference. The discussion in Section 2.1.1 reflects the elevations in the vicinity of the 200-PW-2 waste sites, not necessarily the Cold Creek Bar. The paragraph in question has been modified to make this more clear and the elevation range in the 200 East Area has been updated.		
19.	Section 2.1.3, 1 st ¶	Text refers to "West Lake" to define a boundary, but the reference location doesn't show up on a suitable figure (any of Figures 2-8 through 2-12).
Response: Accepted. A reference to Figure 2-2 will be added to the text.		
20.	2.1.3 ¶1 - 4 th sentence ¶4 - 1 st sentence	Both sentences refer to perched water. This implies a need to describe the vertical and horizontal location of the water in relation to the contaminants. This need is not addressed anywhere in this work plan. Descriptions of perched water should show up in Section 2.5.
Response: One of the main purposes of the work plan is to refine the conceptual model and provide data to support remedial decisions and closure of the RCRA TSD units. As outlined in the Implementation Plan and this work plan, the initial phase of characterization involves the collection of data from TSD sites, and worst case and typical waste sites in terms of contaminant inventory (i.e. the representative sites). This task is implemented with the collection of data to determine the vertical distribution of contamination beneath these sites. Little data, with the exception of some RLS data, will be acquired to evaluate the lateral extent of soil contamination or perched water at this time. The lateral extent of soil contamination and perched water (if present) will be addressed during other phases of sampling (confirmation and verification sampling) as outlined in the Implementation Plan. Note that effluent has not been discharged to these waste sites since 1988. Therefore, it is not anticipated that perched water is present at these sites. If perched water is encountered beneath representative sites and TSDs, the information will be incorporated into a revision of the waste site conceptual contaminant distribution model. Some clarification will be added to the text of the first paragraph.		
21.	2.1.3 ¶3 - 7 th sentence	The text refers to discharges "from sanitary sewers." This should be clarified as to whether its leakage or discharge of treated effluent. Also, this implies a need to describe the vertical and horizontal location of the "discharge" in relation to the contaminants. This need is not addressed anywhere in this work plan.
Response: Acknowledged. The text was meant to imply discharge of effluent via a drain field. The text will be clarified to read "...discharges from sanitary sewer system drainfields, ...". The discussion of potential impacts from discharges from other sites relative to PW-2 waste sites will be addressed in later stages of the RI/FS process. None of the representative waste sites being characterized are affected by adjacent discharges. As a point of information there are only 2 septic system drainfields (2607-W5 and 2607-W7) located relatively close to PW-2 waste sites (216-U-1&2 cribs, and 216-U-5 and 216-U-6 cribs, respectively) to be considered. The 2607-W5 system was evaluated and reported as part of the 200-UP-2 LFI (DOE/RL-95-13) in 1995 and was considered during development of the PW-2 work plan. The second (2607-W7) was abandoned in 1999.		
22.	2-5, 2 nd ¶, 1st sentence	Insert "Historical" at start of sentence, i.e., "Historical discharges to the ground ..."
Response: Accepted.		
23.	2-5, 4 th ¶	As it reads, the sentence essentially communicates that "the water table is in the Hanford Formation except when it isn't." It can be inferred that the sentence is meant to communicate that the Hanford Fm. lies unconformably on the Ringold Fm. or basalt, so that in places the top of those formations extends above the water table. But the sentence would need to be re-written to communicate that clearly.

Comment #	Section/ Page/ Paragraph/ Sentence	Comment
<p>Response: No change. The Hanford formation does lie unconformably above the Ringold formation, basalt or both, in the vicinity of the 200 East Area. However, the intent was not to explain the depositional variability in geologic units across the 200 East Area as it relates to erosional surfaces. The intent is to reflect that the water table surface beneath the 200 Area can be located within the Hanford formation, the Hanford formation/PPU (?), and/or the Ringold Formation. This relates to the depth to which the characterization boreholes will be placed, as described later in Section 4.</p>		
24.	2.1.4, 5 th ¶	<p>This paragraph would be obscure to anyone except those on the inside of the Hanford groundwater technical core. It appears to be a conglomeration of poorly stated facts rather than following the classic form of topic sentence – supporting sentences – concluding sentence. It could be re-written to greatly improve clarity and to introduce the concepts presented in Section 2.1.5. Some specific comments and questions are:</p> <ul style="list-style-type: none"> • Is the groundwater flow direction difficult to measure (a) in general, or (b) using traditional 3-point approach (i.e., w/o using in-situ velocity measurements) • Do contaminant plumes truly suggest that <u>current</u> flow is primarily to the northwest and southeast (if so, insert the word “current”), or are the plumes simply a relict of historical discharges to ground? • “. . . 200 Areas suggest that groundwater flow is primarily to the northwest and southeast.” lumps together an area of tens of square miles, whereas Figure 2-2 appears to subdivide that same area.
<p>Response: Accepted. Replace the 5th through 7th sentences with the following: “Groundwater flows primarily in two directions in this general area. Groundwater flow is to the northwest through Gable Gap (located between Gable Mountain and Gable Butte on Figure 2-2) and to the southeast. However, the location of the divide between the flow to the northwest and flow to the southeast is not discernable because the water table is nearly flat (PNNL 2000). The very gently sloping water table corresponds to a high transmissivity zone that extends through the 200 East Area (PNNL 2000).” With regard to the bulleted items: Bullet 1. Groundwater flow direction is difficult to determine since the gradient is very flat in the 200 East Area. Bullet 2. The geometry of “current” groundwater plumes suggests past and current flow direction is northwest and southeast. The plumes reflect historical discharges to the ground, possibly from 200-PW-2 and other waste sites in the 200 Areas. Bullet 3. Reference to the “200 Areas” has been deleted in the rewrite of this paragraph.</p>		
25.	2-7, 2 nd ¶	<p>2nd & 3rd sentences redundantly use “the average flow rate has been slowly decreasing as a result of a slight flattening of the water table in the vicinity of the crib” and one usage can be deleted.</p>
<p>Response: Accepted. The first two sentences will be deleted.</p>		
26.	2-8, (Sec. 2.2.1, 1 st ¶	<p>Capitalization & lower-case usage of “Building” in the same sentence seems inconsistent.</p>
<p>Response: No change. The reference to 224-U Building is correct since it is being used as a noun and part of the name. The text is correct as written.</p>		
27.	Sec. 2.2.1, 1 st ¶	<p>5th paragraph reads as if the bismuth/phosphate waste was reused in the reactor plants. Rewrite.</p>
<p>Response: Accepted. In the discussion in the 6th paragraph the sentence will be reworded as follows: “From 1952 to 1965, B Plant was used for various waste treatment operations.”</p>		
28.	Table 2-1	<p>6th column is “Contaminant/Volume Released” but some entries don’t include a volume. Each entry should at least be annotated as to volume, e.g., “Volume unknown” or some other statement.</p>
<p>Response: Accepted. “Volume released is unknown” was added to the text where appropriate.</p>		
29.	Table 2-1	<p>Depth of 200-W-22 is reported as “NR” but table is not footnoted and acronyms do not include “NR.” Include an explanation.</p>
<p>Response: Accepted. Not Reported will be spelled out.</p>		

Comment #	Section/ Page/ Paragraph/ Sentence	Comment
30.	Table 2-1	For 200-W-42 Dates of Operation, change "1858" to "1958" (presumably)
Response: Accepted.		
31.	Table 2-1	For 216-A-28 General Description, change "french" to "French"
Response: No change. The usage is appropriate in the context of the sentence.		
32.	Table 2-1	For 216-S-8 "allowing no close inspections of the area" <u>may</u> be out of sequence within the description (i.e., may more logically follow statement later in the text).
Response: Accepted. This phrase will be deleted.		
33.	Table 2-1	UPR-200-E64: the "source facility" is more descriptive than the "general description" and the latter could be rewritten. What is "radioactive speck contamination"?
Response: Accepted. The general description has been rewritten to the following: "Ants burrowed into contaminated soil originating from a swab riser pipe that is associated with an underground pipeline in the vicinity of the 270-E-1 Neutralization Tank and the 216-B-64 Basin. Wind blown contamination has resulted in a posted soil contamination area." Speck contamination refers to the small particles brought to the surface by the ants that are then blown around by the wind.		
34.		<i>reserved</i>
Response: Per the 3/2/01 email from J. Price there will be no comment here.		
35.	3-13, 2 nd ¶	Parenthetical near end of paragraph appears to group "feces" as an animal. Rephrase.
Response: Accepted.		
36.	Sec. 3.3.3 Sec. 3.5.3.2	This discussion of Environmental Information and Ecological Risk is explained more completely in this work plan than in some other 200 Area documents (e.g., 200-CW-1 work plan). For example: <ul style="list-style-type: none"> pg. 3-13, 2nd ¶ has a coherent explanation of the sample bias >10 pCi/g Exposure to animals > 1 rad/day can be explained as prior to stabilization
Response: Acknowledged. This reflects the availability of data that was collected as part of the 200-UP-2 LFI.		
37.	Figure 3-2 Figure 3-3	The plumes aren't labeled or shaded as to inside & outside the plumes. The inside & outside can be inferred by their lobate shape in some but not all cases (e.g., I-129 in Fig. 3-3). That inference would be beyond the grasp of many layman. The figures should be revised in some manner to better depict the plume locations.
Response: Accepted. The figures have been revised slightly to be more explicit, including Figures 3-7 and 3-8 as well.		
38.	Figures 3-10 through 3-15	These could require revision depending on further evaluation of perched water significance (General Comment #2). Some lateral spreading is depicted in the figures, but without a horizontal scale it's not possible to bound the significance. NOTE: the legends do state "Not to Scale" and it is appropriate to show these models conceptually without a horizontal scale.
Response: Acknowledged. See the response to General Comment #2. Effluent has not been discharged to these waste sites since 1988. Therefore it is not anticipated that perched water is present at these sites. If perched water is encountered during subsequent sampling efforts (confirmation or verification) the information will be incorporated into the site conceptual models. Where data were available, such as for 216-A-10 and 216-A-36B cribs, some degree of lateral spreading has been indicated on the conceptual model.		
39.	Figures 3-10 through 3-15	The legend depiction of "Contaminant Pathway:" has closely spaced vertical lines, whereas the conceptual model has more widely spaced lines. It may not be clear to the layman that the conceptual model shows any "Contaminant Pathway."

Comment #	Section/ Page/ Paragraph/ Sentence	Comment
Response: No change. This is intended as a general depiction to explain the meaning of the vertical lines and is consistent with the way this has been represented in other documents.		
40.	Figure 3-14	It may be useful to show "Ringold Unit A" all on the same level immediately below the solid line dividing the formation, as on this figure it straddles the dashed line designating the water table and could be confusing.
Response: Accepted.		
41.	Figure 3-14 Figure 3-15	The two small shaded polygons are not explained in the legend and it is not clear what they represent.
Response: No change. As discussed in note #4 and as shown by the coloration scale in the legend, the two small polygons represent lenses of medium level contamination found within the H2. Note: This is found only on Figure 3-14.		
42.	Section 5.1	<p>This statement is too broad:</p> <p style="padding-left: 40px;">"By applying CERCLA authority concurrently with RCRA closure and corrective action requirements through integration, cleanup will be addressing <i>all</i> (italics added for emphasis) regulatory and environmental obligations at this OU as effectively and efficiently as possible."</p> <p>The paragraph doesn't mention MTCA, therefore, it can't be stated that <u>all</u> regulatory obligations have been met.</p>
Response: Accepted. Both CERCLA and RCRA authorities for cleanup include the obligation to perform remedial and corrective actions in compliance with MTCA requirements. MTCA requirements are CERCLA ARARs (applicable in this case). RCRA includes compliance with MTCA requirements by way of WAC 173-303-610 (MTCA cleanup levels) for RCRA TSD closures and -646 for RCRA corrective actions. However, in light of this comment, MTCA will be added to Section 5.1 to specify MTCA as an example of requirements that will be complied with. The sentence will read: "By applying CERCLA authority concurrently with RCRA closure and corrective action requirements through integration, cleanup will be addressing all regulatory and environmental obligations at this OU, including compliance with MTCA, as effectively and efficiently as possible."		
43.	Figure 3-16 Appendix B	The conceptual model includes biotic uptake, and one of the waste sites (UPR-200-W-163) was generated by biotic uptake. The sampling plan is therefore deficient because it doesn't address characterization of this secondary release mechanism. The Department of Ecology has previously discussed with DOE that a comprehensive approach to ecological assessment is required for the 200 Area. Discussions are currently underway to define that approach. Accordingly, the Department of Ecology will not require revision of Appendix B this time. The existing statement on page 3-24 is sufficient to address this comment, and no revision of the Work Plan is requested.
Response: Acknowledged.		

Change Number M-15-00-06	Federal Facility Agreement and Consent Order Change Control Form Do not use blue ink. Type or print using black ink.	Date July 12, 2001																		
Originator Bryan Foley, DOE		Phone 376-7087																		
Class of Change <input type="checkbox"/> I – Signatories <input checked="" type="checkbox"/> II – Executive Manager <input type="checkbox"/> III – Project Manager																				
Change Title Interim Milestones for 200-PW-2 Uranium-Rich Process Waste Group Operable Unit RI/FS Work Plan and Process Waste RCRA TSD Unit Sampling Plan Assessment Activities																				
Description/Justification of Change The 200 Areas Remedial Investigation/Feasibility Study (RI/FS) Implementation Plan (DOE/RL-98-28, Rev.0) established the framework for characterization of ER soil waste sites in the 200 Areas and grouped the waste sites into 23 process-based operable units (OUs). These 23 OUs are divided into nine major waste groups. The 200-PW-2 OU is one of 2 representative OUs for the Process Condensate/Process Waste Group. Based on the Implementation Plan, Tri-Party Agreement M-13 milestones were established (TPA Change Request M-13-97-01) for the submittal of RI/FS work plans for individual OUs. The 200-PW-2 OU RI/FS work plan was assigned to Tri-Party Agreement interim milestone M-13-25 (TPA Change Request M-13-99-01) which was met with the submittal of the 200-PW-2 Draft A Work Plan. Based on recent discussions with Ecology and EPA on ways to further streamline 200 Area assessment planning, two additional RCRA TSD units have been added into the RI/FS process as part of the 200-PW-2 OU. This more focused approach was also discussed during the annual review of 200 Area work scope priorities. As a result of this meeting, Ecology agreed that the assessment of the 216-A-37-1 Crib and 207-A South Retention Basin RCRA TSD units (from the 200-PW-4 General Process Waste Group) may be addressed as part of the 200-PW-2 OU work plan to accelerate the investigation of all process waste-type RCRA TSD units. A separate Sampling and Analysis Plan will be prepared for these two RCRA TSD units in FY2002; the implementation of which will be integrated with the 200-PW-2 RI, which would occur in FY2003. <ul style="list-style-type: none"> As specified in the Tri-Party Agreement, Section 11.6, work plans must specify interim milestones for the OU that identify completion dates for major tasks and deliverables specified in the work plans. The 200-PW-2 OU work plan (Continued on page 2)																				
Impact of Change.																				
Compliance due date for the M-20 Major Milestone will need to be modified.																				
Affected Documents The Hanford Federal Facility Agreement and Consent Order, as amended. 200-PW-2 Uranium-Rich Process Waste Group Operable Unit RI/FS Work Plan and Process Waste RCRA TSD Unit Sampling Plan (DOE/RL-2000-60).																				
Approvals <table border="0" style="width: 100%;"> <tr> <td style="width: 40%; border-bottom: 1px solid black;"> <i>W. Wade Ballard</i> DOE </td> <td style="width: 15%; border-bottom: 1px solid black;"> 7/23/01 Date </td> <td style="width: 10%; border-bottom: 1px solid black;"> <input checked="" type="checkbox"/> </td> <td style="width: 10%; border-bottom: 1px solid black;"> Approved </td> <td style="width: 10%; border-bottom: 1px solid black;"> <input type="checkbox"/> </td> <td style="width: 10%; border-bottom: 1px solid black;"> Disapproved </td> </tr> <tr> <td style="border-bottom: 1px solid black;"> EPA </td> <td style="border-bottom: 1px solid black;"> Date </td> <td style="border-bottom: 1px solid black;"> <input type="checkbox"/> </td> <td style="border-bottom: 1px solid black;"> Approved </td> <td style="border-bottom: 1px solid black;"> <input type="checkbox"/> </td> <td style="border-bottom: 1px solid black;"> Disapproved </td> </tr> <tr> <td style="border-bottom: 1px solid black;"> Ecology </td> <td style="border-bottom: 1px solid black;"> Date </td> <td style="border-bottom: 1px solid black;"> <input type="checkbox"/> </td> <td style="border-bottom: 1px solid black;"> Approved </td> <td style="border-bottom: 1px solid black;"> <input type="checkbox"/> </td> <td style="border-bottom: 1px solid black;"> Disapproved </td> </tr> </table>			<i>W. Wade Ballard</i> DOE	7/23/01 Date	<input checked="" type="checkbox"/>	Approved	<input type="checkbox"/>	Disapproved	EPA	Date	<input type="checkbox"/>	Approved	<input type="checkbox"/>	Disapproved	Ecology	Date	<input type="checkbox"/>	Approved	<input type="checkbox"/>	Disapproved
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Ecology	Date	<input type="checkbox"/>	Approved	<input type="checkbox"/>	Disapproved															

and Process Waste RCRA TSD unit sampling plan includes a project schedule with target project milestones. Based on this work plan schedule, the following interim milestones are proposed under the Tri-Party Agreement to implement the activities for the RI/FS process for this OU:

- M-15-43A: Complete 200-PW-2 OU Field Work through Sample Collection and Analysis – September 30, 2003
- M-15-43B: Submit 200-PW-2 OU Draft A Remedial Investigation Report to Ecology – June 30, 2004
- M-15-43C: Submit 200-PW-2 OU Draft A Feasibility Study/Process Waste Closure Plans and Draft A Proposed Plan/Permit Modification to Ecology – December 31, 2005.

These interim milestone dates are consistent with the major milestone M-15-00C to complete the 200 Area operable unit RI/FS process by 2008 but the completion date for proposed Interim Milestone M-15-43C exceeds the completion date for the associated M-20 major milestone. Since a Major Milestone is impacted, a Class I Tri-Party Agreement Change Request will be developed and will require public review/comment. In the spirit of good faith negotiations, a formal commitment for completion of the Class I Change Request will be formalized and agreed to as Tri-Party Agreement commitment _____

Submit Draft Class I Change Requests addressing the
impact to Tri-Party Agreement Major Milestone M-20 and M-13-00

August 31, 2001