

File

U.S. ENVIRONMENTAL PROTECTION AGENCY  
 REGION 10  
 1200 SIXTH AVENUE  
 SEATTLE WASHINGTON 98101



DEC 15 1987

REPLY TO  
 ATTN OF HW-112

Mr. Jack Keating  
 Assistant Manager for  
 Safety, Environment, and Security  
 Department of Energy  
 Richland Operations Office  
 Richland, Washington 99352

Dear Mr. Keating:

We have previously discussed with you and your staff the resource problems that EPA encounters in attempting to deal with hazardous waste problems on the Hanford reservation. Hanford's size (in terms of the number of facilities and waste disposal areas) is so much larger than a typical RCRA or Superfund site that the resources we normally receive through our own budget process simply do not begin to allow us to review the technical issues at Hanford in an adequate or timely way.

We therefore are requesting assistance from the Department of Energy. Since we do not yet have an agreed schedule for all future work at Hanford, it is not possible to foresee just what the level of workload will be. Pending agreement on that schedule, therefore, we anticipate a need for EPA of \$183,200 for the remainder of FY88:

- (1) \$34,100 for support of 0.8 FTE (annual basis of 1.2) on RCRA permitting.
- (2) \$47,500 for support of 0.9 FTE (annual basis of 1.2) of Superfund oversight.
- (3) \$75,000 for Superfund contractor assistance.
- (4) \$26,600 for 0.6 FTE (annual basis of 1.2) for an on-site EPA liaison in Richland.

In addition, we are requesting that you provide the dollars necessary to support 0.8 FTE (annual basis of 1.2) at the U.S. Geological Survey for RCRA permitting support, using DOE-RL's existing Interagency Agreement with USGS.

These positions are described in more detail in the attachment. The variation in cost and FTE reflect our best predictions about the time that these positions would be filled, together with the grade and salary projected for each.

We understand that the appropriate mechanism to implement this request consists of an Interagency Agreement between DOE-RL and EPA Region 10, together with the allocation of reimburseable workyears to EPA from OMB. (This IAG, by the way, is the conventional kind between any two government agencies, not the agreement referred to under Section 120 of the Superfund Amendments.) I suggest that we seek to conclude this IAG as rapidly as possible, and include in it language that makes the funds for FTE contingent on EPA receiving the reimburseable workyears. Then, with this signed IAG and DOE's support at the D.C. level, we may be able to obtain the reimburseable workyears relatively rapidly.

This request would take care of our needs for the balance of FY88. As to future years, I believe that we should develop the principles and procedures for this type of resource support as part of the overall Consent Order and Compliance Agreement.

We appreciate the Department of Energy's willingness to address these resource needs. If EPA, the state, and the USGS all are able to spend the time necessary to do adequate and timely technical reviews of Energy's work, then both your organization and the public will be better served.

Please contact Randy Smith, Deputy Director of the Hazardous Waste Division, for further action on this proposal.

Sincerely,

Charles E. Findley, Director  
Hazardous Waste Division

cc: Marc Horton, Department of Ecology

## I. RCRA Permitting

- A. Background: Prior to the beginning of FY 88, RCRA permitting work was focused on §3004(u) (past practices) requirements and other HSWA provisions and working with the state to develop a facility management plan for permitting or closing all of Hanford's regulated units. The State now has several people dedicated to Hanford and is beginning to review closure plans and permit applications at a rate of one every two to three months.

The EPA permit writer will assist the State with application and Part 265 reviews; do limited oversight reviews of State Notices of Deficiency; write NODs on HSWA provisions such as liner requirements and waste stabilization; but will continue to focus on the COCA and Action Plan (including integration of §3004(u) requirements into the permit and CERCLA processes).

In addition, EPA wishes to retain USGS as its RCRA hydrogeologic consultant for the remainder of FY 88 (with the potential to extend the contract if desired by EPA and USGS). In this capacity, USGS will review the investigations underway at the three operating land disposal units.

- B. Resource Needs: 0.8 FTE EPA (annual basis of 1.2)      \$34,100  
0.8 FTE USGS (annual basis of 1.2)      \$ to be determined

## II. Superfund

- A. Ongoing Work: EPA and USDOE began to address past practices in FY 87 by using RCRA §3004(u) authorities and USDOE "CERCLA" funding, respectively. Since Hanford will soon be proposed to be added to the National Priorities List, the majority of past practices work now will conform to CERCLA requirements. USDOE has started three or more remedial actions already; however, the pace of future RI/FSSs is yet to be negotiated.

For the remainder of FY 88, the EPA site manager will review work already underway and work with USDOE and the state in developing workplans for upcoming PA/SIs and RI/FSSs.

- B. Resource Needs: 0.9 FTE EPA (annual basis of 1.2)  
\$75K contractor assistance

### III. On-site Liaison

- A. DOE and EPA management have discussed the value of having EPA assign a staff person to a full-time liaison position in Richland. This person would increase EPA's access to the on-site technical meetings involving hazardous waste at Hanford, and would also provide DOE and its contractors with a better understanding of EPA's personnel, organization, and policies. While these discussions have not yet gone far enough to specify under what arrangements this liaison would be established, we are including a budget request for it, in anticipation of working out an arrangement satisfactory to all.
  
- B. Resource Needs: 0.6 FTE EPA (annual basis of 1.2)      \$26,600