



May 12, 2005

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Reply to
Attn Of: ECL-117

EDMC

MEMORANDUM

SUBJECT: Memo-to-File Documenting Non-Significant Changes to the 1100 Area Record of Decision, Hanford Site, Benton County, Washington

FROM: Daniel D. Opalski 
Director, Office of Environmental Cleanup
Region 10

TO: Administrative Record (1100 Area)

This memo-to-file documents non-significant/minor changes to the 1100 Area Record of Decision (ROD), Hanford Site, Benton County, Washington. Additional remedial action is warranted at the 600-270 waste site (commonly known as the Horseshoe Landfill) located on the Fitzner-Eberhardt Arid Lands Ecology Reserve. This waste site is approximately 2.8 ha (6.9 acres) and is part of the 1100-IU-1 Operable Unit. The 1100-IU-1 Operable Unit is one operable unit within the 1100 Area.

Horseshoe Landfill was remediated in 1994 under the *Comprehensive Environmental Response, Compensation, and Liability Act of 1980* (CERCLA). The 1100 Area ROD was issued in 1993, and governed the cleanup of the 1100-EM-1, 1100-EM-2, 1100-EM-3, and 1100-IU-1 Operable Units. In 1996, a final closeout report was issued, and the 1100 Area waste sites were deleted from the National Priorities List (NPL) (61 Federal Register 51019).

Following deletion from the NPL, various sampling events occurred at the Horseshoe Landfill between 1998 and 2003. The results of the sampling have been added to the administrative record. The bulk of these sampling efforts are described in the *Evaluation of Risk to Ecological Receptors from DDT at the Horseshoe Landfill*, DOE-RL-2002-35, Rev. 0. Based on sample results, the levels of residual dichlorodiphenyl trichloroethane (DDT) in the soil in portions of the landfill exceed the cleanup level of 1 part per million (ppm). This was the cleanup level established for DDT in 1994 in accordance with the ROD by the U.S. Department of Energy, Richland Operations Office (RL), U. S. Environmental Protection Agency (EPA), and the Washington State Department of Ecology (Ecology) based on *Washington Administrative Code* (WAC) 173-340-740 Method A. WAC 173-340-740 was identified as an applicable or relevant and appropriate requirement (ARAR) in the ROD.

The new data gathered from these sampling events indicates that further remediation of soil contaminated with DDT is necessary at the Horseshoe Landfill to meet Record of Decision requirements. DOE plans to perform cleanup actions in the waste site as described in the approved Richland Environmental Restoration Project Fiscal Year 2005/2006-Detailed Work Plan, DOE/RL-97-44, Rev. 6, Vol. II. Cleanup activities are expected to begin approximately between April and June 2005.

The following non-significant changes are being implemented:

1. Disposal location for any future contamination removed from the site is changed to authorize the use of Hanford's Environmental Restoration Disposal Facility (ERDF), located in the 200 Area, provided the waste meets the ERDF waste acceptance criteria. The original ROD was written before ERDF was available, and hence disposal at an offsite facility was necessary.
2. DOE shall submit a Waste Management Plan to EPA for approval.
3. CERCLA 104(d)(4) allows two or more non-contiguous facilities, reasonably-related on the basis of geography, or on the basis of the threat or potential threat to public health, welfare, or the environment, to be treated as one for response purposes and, therefore, allows the lead agency to manage waste transferred between such noncontiguous facilities without having to obtain a permit. ERDF and the 1100-IU-1 Operable Unit are considered to be a single site for response purposes.
4. DDT is the contaminant of concern at the Horseshoe Landfill. The cleanup level for DDT during the original cleanup in 1994 was 1 ppm based on WAC 173-340-740, Method A. In this instance, the parties have agreed to remove DDT to 0.75 ppm in order to ensure protectiveness.
5. An additional volume of DDT-contaminated soil will require disposal based on existing sampling data.
6. DOE shall utilize applicable sections of the remedial design report, "Remediation Design and Remedial Action Plan for the 1100 Area Hanford Site," DOE/RL-94-08, Rev. 0. Additionally, DOE shall utilize the "100 Area Remedial Action Sampling and Analysis Plan," DOE/RL-96-22, Rev. 4 for additional Quality Assurance/Quality Control requirements, if those requirements are more stringent or if laboratory methods have changed since the time of the 1994 remedial design report for the 1100 Area.
7. Backfill source material may be obtained from offsite, authorized onsite locations, or ERDF stockpiles of clean soil generated from the construction of ERDF disposal cells.

8. DOE shall submit a verification sampling plan or instruction for EPA concurrence or approval prior to beginning verification sampling.
9. DOE shall submit a final report to EPA documenting the actions performed and results of the verification sampling.

If questions arise, please contact Dave Einan at (509) 376-3883.

cc: A. Boyd, EPA
N. Ceto, EPA
J. Price, Ecology
O. Robertson, DOE
J. Zeisloft, DOE
J. Donnelly, BHI
L. Miller, BHI
1100 Area Administrative Record
ERDF Administrative Record (200-DF-1)

Isom, Debra A (Debbi)

From: Zeisloft, Jamie
Sent: Thursday, August 04, 2005 5:49 PM
To: Morrison, Ronald D (Ron); Isom, Debra A (Debbi)
Cc: Wilcox, Debra; Donnelly, Jack W; Bazzell, Kevin D
Subject: RE: Placing the 1100 Area ROD Change Documents in the AR.

Debbi,

After much debate, RL has decided that it would be in our best interest to place the EPA "Memo-to-File Documenting Non-Significant Changes to the 1100 Area ROD" in the admin record. Jack Donnelly (BHI) has a copy of the memo and will get it to you. Thanks for your patience and support.

Jamie

From: Morrison, Ronald D (Ron)
Sent: Thursday, July 21, 2005 11:40 AM
To: Zeisloft, Jamie
Subject: Placing the 1100 Area ROD Change Documents in the AR.

Hi Jamie,

Hope all is well. Regarding the Non Significant Changes to the 1100-EM-1 ROD, you were going to send Debbi Isom (keeper of the AR) a one liner on the decision to place the documents in the AR (and not the Post Decisional File). Know you are swamped but, could you send her something for her files.

Thanks, Ron