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Richland Operations Office
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00-ERD-151

AUG 14 2000

Ms. Jane A. Hedges
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State of Washington
Department of Ecology
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EDMC

Mr. Douglas R. Sherwood
Hanford Project Manager
U.S. Environmental Protection Agency
712 Swift Boulevard, Suite 5
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Addressees:

TRANSMITTAL OF 200 AREA WORK PLANS

Please find attached a copy of each of the following documents:

- "200-CW-1 Operable Unit RI/FS Work Plan and 216-B-3 RCRA TSD Unit Sampling Plan," DOE/RL-99-07, Revision 0;
- "200-CS-1 Operable Unit RI/FS Work Plan and RCRA TSD Unit Sampling Plan," DOE/RL-99-44, Revision 0;
- "200-CW-5 Operable Unit RI/FS Work Plan," DOE/RL-99-66, Rev. 0;
- Final Comment Resolutions for Official EPA Comments on DOE/RL-99-66, "Draft A 200-CW-5 Operable Unit RI/FS Work Plan," and 52361
- Draft Hanford Federal Facility Agreement and Consent Order Change Package.

These are the first three work plans completed that follow the assessment approach outlined in the, "200 Areas Remedial Investigation/Feasibility Study Implementation Plan – Environmental Restoration Program," (DOE/RL-98-28) for characterization and remediation in the 200 Areas. They contain the elements of a Comprehensive Environmental Response, Compensation and Liability Act of 1980 remedial investigation/feasibility study (RI/FS) work plan and Resource Conservation and Recovery Act of 1976 treatment, storage, and disposal unit sampling plan. A sampling and analysis plan and waste control plan accompany each work plan as appendices.

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Public review comments received on the Draft B 200-CW-1 and 200-CS-1 Work Plans have been dispositioned and incorporated accordingly. Comments received on the review of Draft A of the 200-CW-5 Work Plan from the U.S. Environmental Protection Agency have been dispositioned and incorporated, where appropriate. A copy of the final comment resolutions is attached. In addition, for all three work plans, project schedules (section 6.0) to complete the RI/FS process for the operable units have been revised.

If you should have any questions, please contact Bryan L. Foley, Environmental Restoration Division, at (509) 376-7087.

Sincerely,



Jon K. Yerxa, Acting Program Manager
Office of Regulatory Liaison

ERD:BLF

Attachments:

1. DOE/RL-99-07, Revision 0, "200-CW-1 OU RI/FS Work Plan and 216-B-3 RCRA TSD Unit Sampling Plan"
2. DOE/RL-99-44, Revision 0, "200-CS-1 Operable Unit RI/FS Work Plan and RCRA TSD Unit Sampling Plan"
3. 200-CW-5 Operable Unit RI/FS Work Plan, DOE/RL-99-66, Rev. 0
4. Final Comment Resolutions for Official EPA Comments on DOE/RL-99-66, Draft A, "200-CW-5 Operable Unit RI/FS Work Plan"
5. Draft Hanford Federal Facility Agreement and Consent Order Change Package

cc: See page 3

Addressees
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cc w/o attaches:

B. H. Ford, BHI
M. J. Graham, BHI
M. E. Todd, CHI
C. D. Wittreich, CHI
W. Burke, CTUIR
R. Jim, YN
P. Sobotta, NPT
R. F. Stanley Ecology
J. S. Hertzell, FHI
M. B. Reeves, HAB
M. L. Blazek, Oregon Energy

cc w/attaches: Admin Record, H6-08 (200 Area)

cc w/attach 1:

W. W. Soper, Ecology
T. A. Wooley, Ecology
L. C. Treichel, EM-43

cc w/attach 2:

M. Mills, Ecology
W. W. Soper, Ecology
L. C. Treichel, EM-43

cc w/ attach 3:

W. W. Soper, Ecology
L. C. Treichel, EM-43

**Final Comment Resolutions for Official EPA Comments on DOE/RL-99-66,
Draft A 200-CW-5 Operable Unit RI/FS Work Plan**

1. Page 1-1; The new revision of the Tri-Party Agreement should be used as the reference throughout this workplan. Previous versions do not contain the correct operable unit breakdown and are therefore misleading to the reader. Please revise the reference list.

Response: Comment accepted. The Tri-Party Agreement reference has been revised accordingly.

2. Page 2-7, Section 2.2.2, paragraph 2, "Data..." This paragraph suggests that confirmatory sampling is built into remedial design planning. Since remedial design planning has not been done, this statement appears to be false. In the final sentence of the paragraph, the analogous site approach will allow for "early cleanup actions to be performed." This inference is not supported by any facts. The primary purpose, as I see it, was to limit the cost of characterization and pre-select waste sites to be characterized in lieu of the nearly 750 sites within the 200 Area. This paragraph needs work!

Response: Comment accepted. The paragraph will be corrected accordingly.

3. Section 3.2 Environmental Monitoring/3.4 Potential Impacts to Human Health and the Environment; These sections that discuss environmental monitoring are inadequate. The implication of these sections seems to be that little or no environmental monitoring has been done in the 200 Area, and when we find contamination, we cover it with soil. Many of the sites within 200-CW-5 have undergone some level of environmental monitoring. An effort is needed to evaluate what environmental data exists of these sites. EPA would like to discuss this issue with Ecology, DOE, and its contractors to better define the approach to considering and assessing environmental impacts.

Of particular concern is the statement at the top of page 3-14, which states that the preferred land use for the region surrounding the 200 Area is preservation and conservation, yet where in this work plan does it describe the resources to be conserved or protected? EPA does not support the inclusion of ecological sampling on an operable-unit-by-operable-unit basis, but does support an approach that can be used to define the goals of preservation and conservation and assess impacts. The suggestion that if we find contamination, we simply stabilize it by covering with clean soil does not seem to support preservation and conservation and is not a good long-term solution EPA can endorse.

Response: Comment accepted. The response to this comment is provided in two parts:

- *Sections 3.2 "Environmental Monitoring", 3.3 "Nature and Extent of Contamination" and 3.4 "Potential Impacts to Human Health and Environment" of the work plan have been expanded in response to this comment.*

- *RL agrees with EPA's point that ecological sampling on an operable-unit-by-operable-unit basis is not appropriate, but that some approach to assess environmental impacts may be needed to better define remediation goals. RL would like to prepare a white paper on this subject for the 200 Area ER program, which would be used to initiate focused discussions with the regulators later this year.*
4. Table A2-1a, Analytical Performance Requirements for Spectral Gamma Logging; After reviewing the Preliminary Action Levels, it was noted that Americium-241 and Plutonium-239/240 had action levels set at the TRU-Waste designation level of 100 η Ci/g. Since Neptunium-237 is a TRU Analyte, should its preliminary action level also be the same? If not, why not!

Response: Comment accepted. Table A2-1a has been revised to show the TRU-Waste designation level of 100 η Ci/g for Neptunium-237.

5. Page A3.3.3.3, Logging in Existing Wells; After review of this section and the corresponding Table A3-1, it appears the Spectral Gamma Logging (SGL) is only included for 216-Z-11 Ditch and those adjacent Z-Ditches. Additional SGL would be a valuable method to help confirm our approach to characterization as it relates to representative sites. EPA suggests an expansion of the SGL sampling efforts to selected other sites with existing dry wells to confirm the depth of contamination and validate our representative site approach. Simple comparisons of the nature and extent of contamination using SGL will help to support not only the use of representative site concept during characterization, but it is hoped that these data could be used in lieu of additional characterization and sampling during Remedial Design.

Response: Comment acknowledged. A review of the 200-CW-5 OU wells reveals that the only unique waste site (other than 216-U-10 Pond, 216-U-14 Ditch, or Z-Ditches) within the 200-CW-5 OU with an accessible well is the 216-U-9 Ditch. However, because the associated well (699-35-78A) is located approximately 50-ft. west of the ditch, it is not a viable candidate for collection of meaningful SGL data. Therefore, no additional wells have been specified for SGL within the 200-CW-5 OU.

Change Number M-13-2000-xx	Federal Facility Agreement and Consent Order Change Control Form Do not use blue ink. Type or print using black ink. Confidential Interim Negotiation Product, Do Not Distribute	Date August 9, 2000 Draft
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 the 200-CW-1, 200-CS-1, and 200-CW-5 Operable Unit Assessment Activities		
Description/Justification of Change <p>The 200 Areas RI/FS Implementation Plan (DOE/RL-98-28, Rev.0) established the framework for characterization of ER soil waste sites (approximately 700) in the 200 Areas and grouped the waste sites into 23 process-based operable units. Based on the Implementation Plan, Tri-Party Agreement M-13 milestones were established (TPA change number M-13-97-01) for the submittal of RI/FS work plans for individual operable units. The following milestones under M-13-00 and associated operable units have been met by the submittal of Draft A work plans:</p> <ul style="list-style-type: none"> • M-13-20, 200-CW-1 Gable Mountain/B Pond and Ditches Cooling Water Group Operable Unit • M-13-21, 200-CS-1 Chemical Sewer Group Operable Unit • M-13-22, 200-CW-5 U Pond/Z-Ditches Cooling Water Group Operable Unit. <p>As specified in Section 11.6 of the Action Plan to the Tri-Party Agreement, the work plans must specify interim milestones for the OUs. The work plans include a project schedule with target project milestones. Based on these work plan schedules, the following interim milestones are added to the Tri-Party Agreement to implement the activities for the Remedial Investigation/Feasibility Study process for these OUs:</p> <p><u>200-CW-1</u> M-13-20A: Submit Draft A Feasibility Study and RCRA TSD Unit Closure Plan – September 28, 2001.</p> <p><u>200-CS-1</u> M-13-21A: Complete Field Work through Sample Collection and Analysis – September 30, 2003 M-13-21B: Submit Draft A Remedial Investigation Report – May 31, 2004 M-13-21C: Submit Draft A Feasibility Study and RCRA TSD Unit Closure Plan – September 30, 2005.</p> <p><u>200-CW-5</u> M-13-22A: Complete Field Work through Sample Collection and Analysis – September 30, 2002 M-13-22B: Submit Draft A Remedial Investigation Report – May 15, 2003 M-13-22C: Submit Draft A Feasibility Study – August 16, 2004.</p> <p>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.</p> <p>Based on an annual evaluation of 200 Area OU priorities, the reprioritization of the 200-PW-1 and 200-PW-4 OUs is recommended. As the source for carbon tetrachloride in the 200 West groundwater, the assessment of 200-PW-1 waste sites is required to support an integrated approach to remediation including science and technology needs. Therefore, this change replaces the 200-PW-4 OU Draft A work plan with the 200-PW-1 OU Draft A work plan under Interim Milestone M-13-26 with no change to the milestone date.</p>		
Impact of Change. Addition of interim milestones under M-13-20. Addition of interim milestones under M-13-21. Addition of interim milestones under M-13-22. Substitute the submittal of the 200-PW-1 Draft A Work Plan for the submittal of the 200-PW-4 Draft A Work Plan under Milestone M-13-26 (June 30, 2001).		

