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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10 HANFORD PROJECT OFFICE  
712 SWIFT BOULEVARD, SUITE 5  
RICHLAND, WASHINGTON 99352



March 30, 1995

Steven H. Wisness  
Tri-Party Agreement Manager  
U.S. Department of Energy  
P.O. Box 550, A5-15  
Richland, Washington 99352

Re: Proposed Plan for the 300-FF-1 Operable Unit (DOE/RL-95-10) 40712

Dear Mr. Wisness:

The purpose of this letter is to inform the U.S. Department of Energy (USDOE) that the U.S. Environmental Protection Agency (EPA) and the Washington State Department of Ecology (Ecology) are rejecting the proposed plan referenced above because it is inadequate. For example, there are no applicable or relevant and appropriate requirements (ARARs) listed, nor are any numeric cleanup standards provided. In addition, the summary of site risks must be completely rewritten. The estimated costs of the excavation and disposal alternatives are grossly inflated compared with the actual cost of the expedited response action for the process trenches. Finally, and most importantly, the preferred alternative described in the plan is totally unacceptable; the "institutional controls" alternative for the burial grounds in the 300-FF-1 Operable Unit cannot be supported by the available data and the "waste consolidation" alternative for the process waste units constitutes illegal placement under RCRA.

EPA, Ecology and USDOE agreed during the 300-FF-1 Operable Unit Remedial Investigation to a minimal investigation of the 300-FF-1 burial grounds. This agreement was predicated on the assumption that, because these burial grounds are adjacent to the Columbia River, the buried wastes would be exhumed and disposed of in an acceptable location, such as the Environmental Restoration Disposal Facility (ERDF). Insufficient data was collected to support a decision to leave the waste in place. On the contrary, the data indicate that waste in one of the burial grounds is regularly in contact with the groundwater during high water stages. The proposal to leave the buried waste in place is not protective.

The process waste units include the 300 Area Process Trenches (APT). USDOE has submitted a demonstration that the contaminated spoils pile within the boundary of the 300 APT, generated by the Expedited Response Action, should no longer be managed as dangerous waste. This demonstration is currently being considered by Ecology through the closure process for a "contained in" determination. This determination will be based

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on the comparison of known concentrations of listed wastes currently present in the spoils pile with MTCA Method B numeric cleanup levels, including 100X groundwater cleanup levels. An unconditional contained in determination will not be granted unless the concentration of each listed waste present, or expected to be present, is below MTCA Method B as described above. If concentrations are found to be above 100X groundwater cleanup levels, but below direct contact levels for soils, Ecology will, through approving a conditional contained in determination, require the spoils pile to be disposed of to a RCRA-compliant disposal facility. Examples of such facilities would include ERDF and the RCRA trenches of the Low Level Burial Grounds (e.g., W-025). USDOE's preferred alternative describes disposal of this waste from this unit in a non-compliant manner. Placement of the waste in this manner would constitute illegal disposal under RCRA if the contained in determination is conditional. EPA and Ecology will not consider management of the spoils pile or any similar contaminated media within the 300 APT or the 300-FF-1 Operable Unit in a manner that is not compliant with CERCLA and RCRA.

The preferred alternative supported by the data is exhumation and disposal in ERDF of wastes in those burial grounds outside of the 300 Area (e.g., 618-4, 618-5, and landfills 1a through 1d). This includes soil contaminated by waste migration. In addition, soil from the process waste units contaminated above the cleanup standard (25 mrem) should be removed and disposed in ERDF.

Please revise the proposed plan as soon as possible, so that the project schedules can be maintained. If you have any questions, please call Dave Einan (EPA) at (509) 376-3883 or Ted Wooley (Ecology) at (509) 736-3012.

Sincerely,



Douglas R. Sherwood  
U.S. Environmental  
Protection Agency



Steve Alexander  
Washington State  
Department of Ecology

cc: D. Einan, EPA  
M. Harmon, DOE-HQ  
R. Holten, DOE-RL  
M. Jaraysi, Ecology  
R. McLeod, DOE-RL  
R. Stanley, Ecology  
T. Wooley, Ecology  
Administrative Record (300-FF-1 Operable Unit)