



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

JUL 28 2004

04-AMCP-0267

Mr. John B. Price  
State of Washington  
Department of Ecology  
1315 W. Fourth Avenue  
Kennewick, Washington 99336

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EDMC

Dear Mr. Price:

RESPONSE TO REQUEST FOR REVISION OF THE 200-IS-1/200-ST-1 OPERABLE UNITS  
REMEDIAL INVESTIGATION FEASIBILITY STUDY WORK PLAN ✓

This letter responds to the State of Washington, Department of Ecology (Ecology) letter dated August 19, 2003, which requested a revision to the Tanks/Lines/Pits/Boxes/Septic Tank and Drain Field Waste Group Operable Units Remedial Investigation/Feasibility Study Work Plan and RCRA TSD Unit Sampling Plan (DOE/RL-2002-12, Revision 0). The attachment to this letter provides detailed responses regarding the specific revisions which U.S. Department of Energy (RL) understands are necessary to gain Ecology approval of the subject work plan. Since remedial investigation activities are planned for the spring of 2005 for these operable units, the revision of the work plan needs to be completed by the end of Calendar Year 2004 to support those field efforts.

RL would like to propose a series of meetings in the near future to finalize the scope of the work plan revision leading to a clear understanding by all parties of the scope of the revision. RL is proposing to finish revision 1 of the work plan, including the decision logic for the pipelines, for submittal to the regulators by December 31, 2004, to achieve subsequent approval of the document by February 2004.

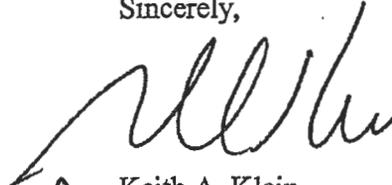
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We look forward to working with Ecology on the completion of this effort. If you have questions, please contact me, or your staff may contact Matt McCormick, Assistant Manager for the Central Plateau, on (509) 373-9971, or Joel Hebdon, Director, Office of Environmental Services, on (509) 376-6657, for regulatory issues.

Sincerely,



A Keith A. Klein  
Manager

AMCP:BLF

Attachment

cc w/attach:

B. H. Ford, FHI

M. E. Todd-Robertson, FHI

M. A. Wilson, Ecology

Environmental Portal

## Attachment

### **Tanks/Lines/Pits/Boxes/Septic Tank and Drain Field Waste Group Operable Units Remedial Investigation/Feasibility Study Work Plan and RCRA TSD Unit Sampling Plan (DOE/RL-2002-12, Revision 0)**

The State of Washington, Department of Ecology (Ecology) letter dated August 19, 2003, requested a revision to the subject work plan to provide additional evaluation of remedial technologies. Ecology further requested that the revision address processing of multiple tanks as a likely response scenario and that ecological characterization needs be identified in the revised work plan.

In addition to the formal letter discussed above, Ecology provided an email to Bryan Foley, U.S. Department of Energy, Richland Operations Office (RL) on August 7, 2003, recommending that RL consider an additional focus beyond representative site characterization, on the potential use of an observational approach/accelerated cleanup and provided some criteria for applying the acceleration decisions as follows:

- Small sites (<100 cubic yard estimated waste volume): remove and dispose, with sampling in the bottom of the excavation
- Larger, shallow, less contaminated structures:
  - Demolish the structure (improving access and therefore getting a more representative sample), then make a decision to remove and dispose
  - Grout the void, and sample the grouted monolith to evaluate risk, with alternatives including institutional controls or capping.

During informal discussions with RL, Ecology has also indicated concern that a number of sites assigned to the 200-IS-1 and 200-ST-1 Operable Units (OUs) are organizationally assigned to CH2M Hill. Ecology requested that this issue be resolved through the revision to the work plan.

One additional area of concern over the revision to this work plan has been raised through the Central Plateau Interagency Management Integration Team (IAMIT). The IAMIT has identified the need for a unified approach to the decision making process and remediation of Central Plateau pipelines. The Tanks/Lines/Pits/Boxes/Septic Tanks and Drain Fields Work Plan has been identified as a potential document to address the decision criteria and process for resolving the pipeline remediation planning issues.

The U.S. Department of Energy agrees to the following revisions to the Tanks/Lines/Pits/Boxes/Septic Tanks and Drain Fields Work Plan in the understanding that these changes will lead to Ecology's approval of the work plan:

1. A more in depth review of potential remedial technologies that may be considered for remediation of the waste sites in these OUs and the potential impact that additional technologies may have on the sampling design.
2. A review of the waste sites to evaluate the potential to bypass a more extensive Remedial Investigation/Feasibility Study process by using the observational approach, similar to work currently being done in the 200-UR-1 OU work plan.
3. Reconciliation of the ownership/responsibility for sites that were not considered in the Revision 0 work plan as they are currently assigned to the U.S. Department of Energy, Office of River Protection/CH2M Hill.

The processing of multiple tanks will not be evaluated in the work plan, but will be an element of the feasibility study for these OUs. This is a remedial implementation and cost issue and not necessarily a remedial investigation issue. The identification of ecological data needs for the 200 Area OUs is being addressed by the Central Plateau Ecological Data Quality Objective and Sampling Analysis Plan. Surface samples at the representative sites will be considered in the work plan; however, as opportunistic sampling to obtain information on near-surface soils to support the Central Plateau ecological risk assessment to be completed in Fiscal Year 2007.

The work plan revision provides an opportunity to document efforts by the IAMIT and others to develop a logical process for characterizing and ultimate remediation of pipelines. While this is not necessarily a driver for revision or a requirement for Ecology approval, RL does feel that this work plan is the appropriate place to document the decision logic for the pipelines. In the unforeseen event that the decision logic for the pipelines can not be delineated in time to support the proposed December '04 re-submittal schedule, RL will issue the document on schedule without the decision logic, and work unresolved issues at a later date.