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Approach and Plan for Cleanup Actions in the 100-IU-2 and 100-IU-6 Operable Units of the Hanford Site



United States
Department of Energy
Richland, Washington



For External Review

Approach and Plan for Cleanup Actions in the 100-IU-2 and 100-IU-6 Operable Units of the Hanford Site

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**United States
Department of Energy**

P.O. Box 550
Richland, Washington 99352

For External Review

Focus

**APPROACH AND PLAN FOR CLEANUP ACTIONS IN THE
100-IU-2 AND 100-IU-6 OPERABLE UNITS
OF THE HANFORD SITE****1.0 INTRODUCTION**

An administrative approach similar to that recently developed for the 100-KR-2 Operable Unit (DOE-RL 1995a) will be used to reach cleanup decisions under the *Comprehensive Environmental Response, Compensation, and Liability Act* (CERCLA), also known as "Superfund," for the 100-IU-2 and 100-IU-6 Operable Units. The previous approach included production of a work plan, a limited field investigation report, a qualitative risk assessment, a focused feasibility study, and a proposed plan, all culminating in an interim action record of decision.

The current approach will use an abbreviated work plan, called a "focus package" (this document), as a scoping activity per Section 7.2.2 of the *Hanford Federal Facility Agreement and Consent Order* (Tri-Party Agreement), to summarize the information gathered to date relating to the 100-IU-2 and 100-IU-6 Operable Units and to determine the extent of evaluation necessary to make cleanup decisions for identified sites. The current approach will combine the limited field investigation and qualitative risk assessment reports into the focused feasibility study. The focused feasibility study will analyze methods and costs for cleaning up waste sites. Consolidating the documents will reduce the time to complete the CERCLA process by 16 months, compared to the previous approach. The proposed plan, to be produced by the U.S. Department of Energy (DOE) based on the focused feasibility study, will recommend a preferred alternative for cleaning up waste sites for public comment and review. The record of decision will select a cleanup alternative.

Public participation in the planning and approach for cleanup of the 100-IU-2 and 100-IU-6 Operable Units is requested. If you would like to provide written comments on the information and approach presented in this focus package, write to the lead regulatory agency (U.S. Environmental Protection Agency [EPA]) for the 100-IU-2 and 100-IU-6 Operable Units. Please submit written comments on this focus package by XXXXXX, 1996, to the following:

Larry Gadbois
U.S. Environmental Protection Agency
712 Swift Blvd, Suite 5
Richland, Washington 99352
or call (509) 376-9884 if you have questions

Information about the Hanford Site in general and the 100-IU-2 and 100-IU-6 Operable Units in particular is available in the Administrative Record for the Hanford Site at the following locations:

PORTLAND: PORTLAND STATE UNIVERSITY

Branford Price Millar Library
Southwest Harrison and Park
Portland, Oregon 97207
Attn: Michael Bowman or Susan Thomas
(503) 724-4729

RICHLAND: WASHINGTON STATE UNIVERSITY-TRI-CITIES

Public Reading Room
100 Sprout Road
Richland, Washington 99352
Attn: Terri Traub
(509) 376-8583

SEATTLE: UNIVERSITY OF WASHINGTON

Suzzallo Library,
Government Publication Room
Seattle, Washington 98195
Attn: Eleanor Chase
(206) 543-4664

SPOKANE: GONZAGA UNIVERSITY

Foley Center
East 502 Boone
Spokane, Washington 99258
Attn: Lewis Miller
(509) 328-4220 Ext. 3125

2.0 100-IU-2 AND 100-IU-6 AREA INFORMATION

The 100-IU-2 Operable Unit includes the site of the former town of White Bluffs and vicinity. Until 1943, White Bluffs was an agriculture-based community of about 500 people that existed before the Manhattan Engineering District (MED) project era (Figure 1). Many of the sites within the 100-IU-2 Operable Unit are remnants of that town and the surrounding farms. When the government took over the site, many of the houses were demolished and new temporary buildings such as blacksmith shops, receiving and storage warehouses, and offices were erected. While most government activities in the 100-IU-2 Operable Unit ceased early in the 1950's, it was not until the 1970's that virtually all the remaining facilities were removed (Carpenter 1995). The 100-IU-5 Operable Unit, called the Pickling Acid Cribs, is contained within the borders of the 100-IU-2 Operable Unit. However, cleanup actions for the Pickling Acid Cribs are addressed under separate documentation (e.g., DOE-RL 1993).

The 100-IU-6 Operable Unit is located at the site of another former agriculture-based town, called Hanford, that existed before the government takeover (Figure 1). By 1942, Hanford had grown to a few hundred farm families. After 1942, the area was used as a temporary housing camp for more than 45,000 construction workers. In general, the sites within the 100-IU-6 Operable Unit include surface debris, oil spills, trash dumps, building foundations, surface depressions, and ash piles, either from the pre-MED towns or MED-era activities (Deford 1995). Except for graphite machining, which continued until the early 1950's, government operations at the Hanford townsite had ceased by 1945.

Both of these operable units are source operable units concerned with hazardous substances that have been released, or have the potential to be released, to the environment. Hydrocarbon contamination and lead are considered to be the most likely indicators of potential groundwater contamination from sites in these operable units. December 1995 searches of the groundwater database for 100-IU-2 and 100-IU-6 vicinity wells for occurrences of benzene, ethyl benzene, xylene, and toluene (gasoline additives and indicators of hydrocarbon contamination) showed no levels above detection limits (see locations of groundwater monitoring wells searched for evidence of hydrocarbon contamination, Figure 2). Searches of all 600 Area wells for lead contamination above detection limits showed no occurrences for lead in any well near the 100-IU-2 or 100-IU-6 Operable Units.

In addition, characterization of groundwater quality beneath the 100-IU-2 Operable Unit has been evaluated through the monitoring of isolated wells in the 600 Area, including wells 699-77-36, 699-81-38, 699-83-36, and 199-F1-2 (Figure 2), as wells as through characterization work completed for the 100-FR-3 Groundwater Operable Unit (DOE-RL 1995b). DOE-RL (1995b) reported groundwater contamination by trichloroethylene (TCE) to 29 ppb under the 100-IU-2 Operable Unit (see Table 1). If, in the future, additional groundwater contamination is attributed to waste sites within the 100-IU-2 Operable Unit, the contamination will be addressed as part of the 100-FR-3 Groundwater Operable Unit.

Figure 1. Approximate Proposed Boundaries of the 100-IU-2 and 100-IU-6 Operable Units.

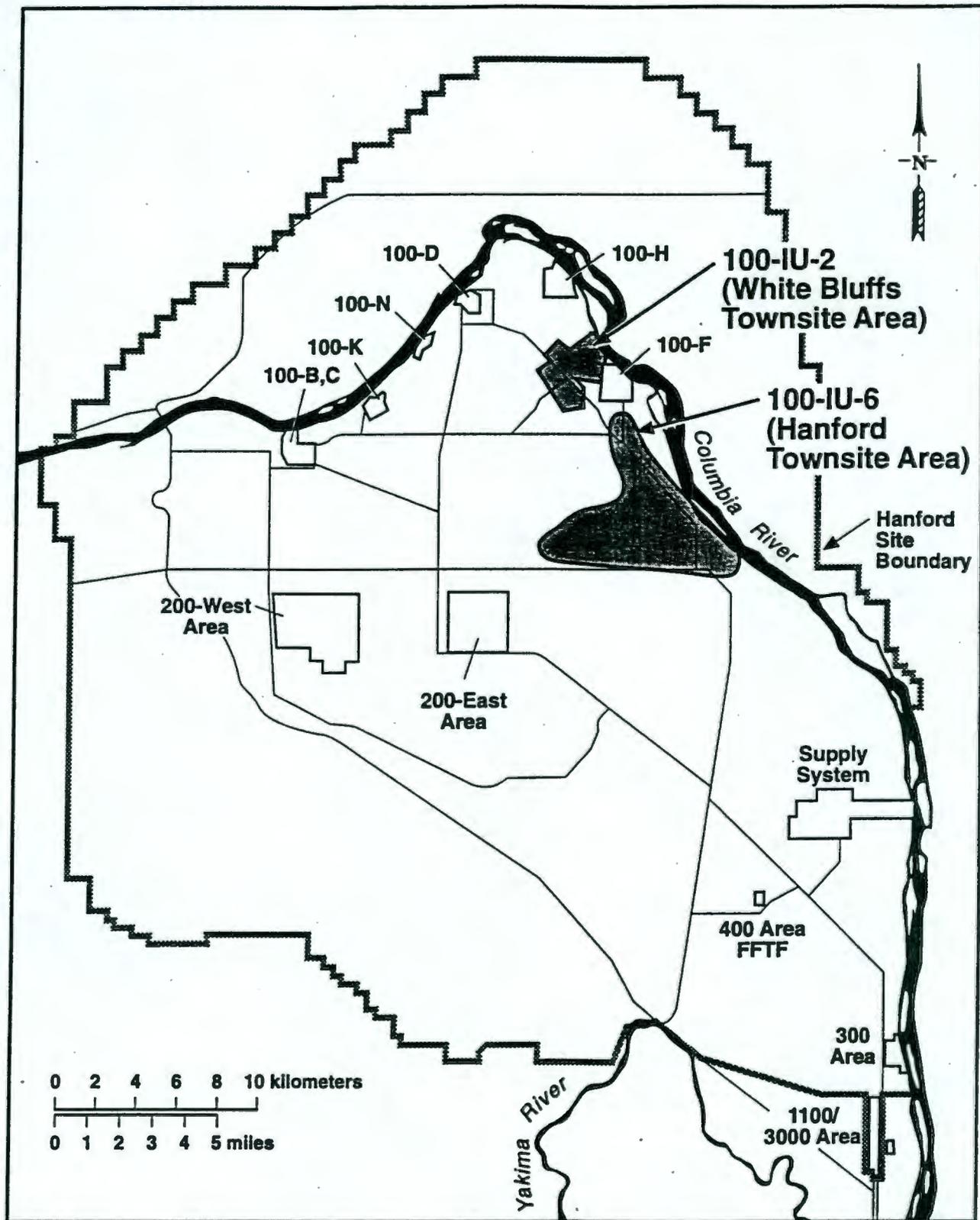
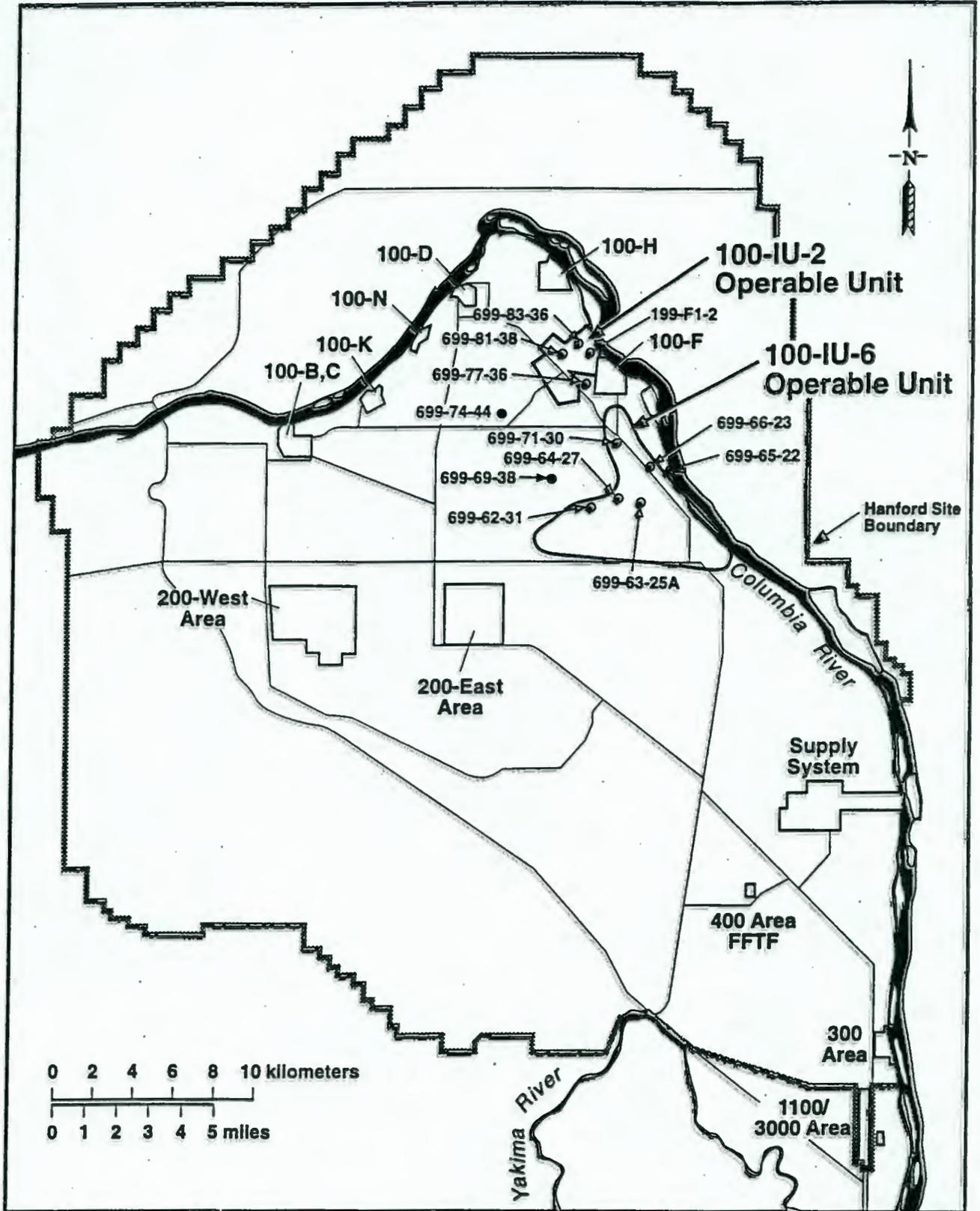


Figure 2. Approximate Locations and Number of Monitoring Wells Near the 100-IU-2 and 100-IU-6 Operable Units Searched for Hydrocarbon Contamination.



Groundwater quality beneath the 100-IU-6 Operable Unit is monitored at isolated wells in the 600 Area, including 699-62-31, 699-63-25A, 699-64-27, 699-65-22, 699-66-23, 699-69-38, and 699-71-30 (Figure 2). Known groundwater contamination underlying the 100-IU-6 Operable Unit has its origin primarily in liquid waste disposal that formerly occurred in the 200 East Area. Maps showing the distribution of radionuclides and hazardous chemicals (presented in the sitewide groundwater surveillance report for 1994) provide evidence of this (Dresel et al. 1995, Figures S.1 and S.2). Additional description of hydrogeologic conditions near the operable unit can be found in Luttrell et al. (1992). No sources for groundwater contamination from within the 100-IU-6 Operable Unit have been identified to date. If sites within the 100-IU-6 Operable Unit are subsequently identified that do have potential to contaminate groundwater, additional characterization activities and groundwater monitoring may be warranted.

Figure 1 shows the approximate proposed boundaries of the 100-IU-2 and 100-IU-6 Operable Units. Because of the large number of reported sites in each operable unit, maps showing precise locations of the individual sites within these operable units are not included. More detailed information on the locations, history, and descriptions of the sites can be found in the technical baseline reports for the 100-IU-2 area (Carpenter 1995) and for the 100-IU-6 area (Deford 1995). Background information on geology and meteorology used to evaluate the sites can be found in the 100-FR-1 and 100-FR-3 Work Plans (DOE-RL 1992a and DOE-RL 1992b, respectively).

The ecological and cultural resource concerns for these areas have been shaped by their past uses. Most of the houses and facilities were removed, and the sites have had almost 50 years to naturally revegetate. In many places, the sites have returned to shrub-steppe vegetation. Other areas, such as the old cultivated fields, have remained in cheatgrass and tumbled mustard with varying amounts of other weeds or bunchgrasses. The return of native shrub-steppe appears to depend on the soil quality, amount of previous disturbance, proximity of native seed sources, and depth of the water table. In addition, many trees remaining from the early townsites provide shelter for mule deer, birds, and other wildlife. Bald eagles roost in trees along the river in winter. Ecological concerns during cleanup activities will depend in large part on what habitat is present at a site and will be addressed at the time of cleanup actions. Because vegetation succession is under way at many of these sites, mitigation actions to protect or replace shrub-steppe during cleanup activities may become more significant as time elapses and the sites eventually return to mature sagebrush.

The 100-IU-2 and 100-IU-6 Operable Units are located in a prehistorically and historically rich area of the Hanford Site. Native American Tribes in the Mid-Columbia region frequented this area as early as 7,000 years ago during seasonal hunting, gathering, and fishing rounds, establishing camp and village locations. During the late 1800's, the area was inhabited by Euro-American settlers who established ranches, farms, and the towns of Hanford and White Bluffs.

Many prehistoric and historic archeological sites have been identified in these operable units. Potential cultural resource concerns include cleaning up historic archeological artifacts and features, disturbing archeological site integrity, following state requirements for proper recording of archeological sites, determining eligibility for listing on the National Register of Historic Places, and determining mitigation efforts. Such issues will be addressed through involvement with the cultural resources staff and tribal representatives.

3.0 WASTE SITES

The 100-IU-2 and 100-IU-6 sites are identified in the Waste Information Database System (WIDS) and/or the technical baseline reports for these areas (Deford 1995, Carpenter 1995). These sites, or types of sites (such as building foundations and oil spills) and general descriptions, are listed in Table 1 for 100-IU-2 and Table 2 for 100-IU-6.

4.0 SITE SCOPING

4.1 SYSTEM FOR CATEGORIZING SITES

Since the takeover of the White Bluffs and Hanford townsites by the federal government in 1943, the use of these operable units was virtually all residential and light industrial, such as warehouses, ice plants, graphite milling, and pipe fabrication. The exception to this is the P-11 site where criticality experiments were conducted in a converted farmhouse. The site was remediated (except for the septic system) after a fire in 1951. Most activities at these operable units were concluded before the 1950's. Thus, the types of sites and expected hazards are substantially different from those associated with operable units at nuclear reactors, where significant amounts of liquid and solid radioactive wastes were disposed to the soil.

To establish the scope of work necessary to reach cleanup decisions for these operable units under the Tri-Party Agreement, the sites in the 100-IU-2 and 100-IU-6 Operable Units have been categorized into groups based on the likelihood of the existence of a CERCLA release and the extent of evaluation required for a site-specific cleanup decision. This categorization activity is consistent with the scoping activity provisions of Section 7.2.2 of the Tri-Party Agreement and with the *Hanford Past-Practice Strategy* (DOE-RL 1991). The *Hanford Past-Practice Strategy* encourages a "bias for action" that helps to initiate and complete cleanup actions earlier than usual for Superfund projects and makes maximum use of existing data, rather than acquisition of new data, in arriving at cleanup decisions.

Table 1. Summary of Sites Described in the 100-IU-2 Technical Baseline Report (Carpenter 1995) with Proposed Category Assignments.

Site Type or Facility Name	Section (Carpenter 1995)	Description	Proposed Category*
Pre-Manhattan Engineering District (MED) Community Dump Site	4.1	This several-acre area is scattered with debris from the White Bluffs town and Manhattan Engineering District activities (e.g., barrels, oil cans, electrical parts). Groundwater contamination by TCE (to 29 ppb) may have originated from barrels in this dump.	Category 2 for TCE barrels: In a July 13, 1995, meeting, the 100-FR-3 team (ERC/DOE/EPA/Ecology) concluded that low, widespread levels of TCE posed no risk and an IRM was not justified. Source of TCE not positively identified; draft report appears to indicate barrels (now empty) at trash dump were possible cause. Category 4 for trash.
White Bluffs City Landfill White Bluffs Landfill White Bluffs City Dump Other MED-era trash dumps and debris	4.2.3, 4.2.4, 4.2.7, 4.8, 6.1.3, 6.14	Former townsite and MED-era landfills, trash dumps, and debris. Historical information on pre-MED activities and site surveys of debris (e.g., nonhazardous plumbing fixtures, wooden and metallic debris) indicate little likelihood of a CERCLA release.	Category 5
Farm, Domestic, and MED-era Debris, building sites and foundations	4.2.1, 4.2.6, 4.2.7, 4.2.9, 4.13, 4.14, 4.16, 5.1, 5.8, 5.9, 6.1, 6.3, 6.5	Building foundations and sites with no evidence for or likelihood of a release of a hazardous substance (as determined through field surveys and historical information). Scattered debris includes nonhazardous porcelain plumbing fixtures, pipes, glass, metal fragments, and wood. Bucket of lead (described in Section 4.2.9) removed and recycled in December 1995.	Category 1
600-52 White Bluffs Surface Basin	4.5	Site received waste water from the ice house facilities and overflow from the adjacent Pickling Acid Crib (100-IU-5), which is expected to soon have a final no-action record of decision.	Category 5
Oil, solvent, and paint drain and dump sites, burn pits, asbestos, fumigation building site, french drain	4.2.2, 4.2.5, 4.2.10, 4.2.12, 4.2.13, 4.3, 4.4, 4.9, 4.10, 4.12, 4.15, 4.17, 4.18, 5.3, 5.4, 5.6, 5.7, 6.1 (sites 40 and 41), 6.2, 6.4, 6.6, 6.7, 6.8, 6.9, 6.10, 6.11	Across the operable unit are many burn pits and sites where oil cans were drained or spilled, or where waste solvents and paint were drained. Because of the age of these sites (about 50 years), there is little potential for volatile or semivolatile petroleum products to remain.	Category 4 Potential gas storage tank (Sections 4.1.8 and 6.1 [sites 40 and 41] at service station to be addressed through underground storage tank program procedures
Ash piles	4.7, 5.2	Ash piles have been found in several locations. Sampling of other ash piles indicates no hazardous levels of metals in the ash.	Category 4
Surface depressions	4.2.8, 4.11, 6.12	The operable unit has numerous surface depressions, dug for irrigation reservoir, overflow water, or other unknown purposes.	Category 1
Physical hazards	4.2.11, 5.5, 5.10	Several potential physical hazards have been identified, such as a cistern and underground structures (e.g., valve boxes) that are caving in.	Category 1

*See document text for description of categories.

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Table 2. Summary of Sites Described in the 100-IU-6 Technical Baseline Report (Deford 1995) with Proposed Category Assignments. (sheet 1 of 3)

Site Type\ Facility designation	Section (Deford 1995)	Site Purpose	Proposed Category*
Trash Dumps\ 600-3 Excess Material Storage Yard\Paint Pit	3.3	Large area (about 34 acres) of overlapping dump and burial sites; received various classes of refuse. Site contains metal scrap, paint cans, electrical parts, transite, and other debris. Some areas with stained soil and no vegetation. Possibly subsurface debris. Radiation survey in 1992 detected no contamination.	Category 4
600-26 Hanford Townsite Burn Pile	3.9	Dumping area for Hanford Townsite; reportedly contains construction refuse burn pile and possibly asbestos and barrels. 8-ft-deep pit near tank cleaning site (see above), west of Hanford Townsite. Reported to be nonhazardous and nonradioactive (Deford 1995). Deford could not locate.	
Hanford Townsite Landfill Hanford Townsite Landfill 2 Hanford Trailer Camp Landfill Graphite Dump Site	3.6, 3.7, 4.3, 4.8,	Trash dumps from the Hanford Townsite; contain domestic and light industrial wastes (concrete scraps, rebar). Historical information and site surveys of debris (e.g., nonhazardous glass, metal fragments, fabric, rubber, concrete) indicate a low likelihood of a release or presence of CERCLA hazardous materials.	Category 5
Burn pits and Industrial Trash Dumps	4.13, 4.2	Four Burn and Burial Pits, Burn and Burial Trench Landfills (Trash Dumps) and burn pits mostly received some pre-1944 household trash, but as burn pits may have also received oils, solvents, or paints	Category 4
Petroleum Wastes\ UPR-600-18 Gasoline Spill near 100-F	3.12	Unplanned Release 600-18. In 1987 a fuel tanker truck overturned 1/2 mile south of 100-F reactor site, spilling an estimated 1,344 L (355 gal) of gasoline, diesel, and ethylene glycol. Site cleanup was planned in 1987, involving excavation of 20 yd ³ of soil. However, no record discovered if accomplished. Site unable to be located; no evidence of accident or spill remains in area.	Category 2
Septic Facilities	4.1, 4.4, 4.10	213J and 213-K Guard House Toilet Pit, Septic Tanks and Sewage Treatment Plants, Honey Dump Stations. Received domestic wastes; no evidence of hazardous materials.	Category 1
Septic Facilities\ Septic Tanks and Drain Field, P-11 Site	4.14	Suspect Site. Two septic tanks and a drain field were used at the Critical Mass Laboratory and probably have not been removed. One tank is of pre-Manhattan-era origin. The replacement tank is 500 gal, with a 60-ft-long drain field.	Category 4
Underground Storage Tank\ Service Stations and Potential Underground Tanks	4.9	Suspect Sites. Four automobile service stations are reported to have been at the Hanford Construction Camp. Deford (1995) reports that three are locatable and two (at least) had underground fuel tanks. These three sites are currently grassy fields, with some asphalt rubble, but no other obvious evidence of facilities. Ground-penetrating radar scans and site surveys with former residents were not able to locate any underground tanks.	Address gasoline storage tanks through underground storage tank program procedures
Nonhazardous\Nonradioactive Waste Sites\ 213-J and 213-K Plutonium Storage Vaults	3.1	Concrete vaults, each 12 ft wide, 40 ft deep under Gable Mtn, 8-ft ceiling. Steel door, concrete loading dock, four ventilation ducts above each vault. Used 1944 to present; initially built to store plutonium, but used only briefly (if at all) for that purpose. Used for storage of explosives and radioactive-sodium-contaminated hardware. Now used for seismic testing and soil sample storage.	Category 5

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Table 2. Summary of Sites Described in the 100-IU-6 Technical Baseline Report (Deford 1995) with Proposed Category Assignments. (sheet 2 of 3)

Site Type\ Facility designation	Section (Deford 1995)	Site Purpose	Proposed Category*
Nonhazardous\Nonradioactive Waste Sites\ 213-J and 213-K Crib Sites	3.2	1944-? Drained loading docks; no evidence of drains to the cribs from inside the vaults. Were located on each side of the 213 Storage Vault entrance. Cribs have been surveyed and removed.	Category 2 with appropriate documents, Category 4 if not
Nonhazardous\Nonradioactive Waste Sites\ 600-24 Anti-Aircraft Artillery Compound and Dump Site	3.4	Inactive dumping site; foundations, well sites, and surface debris visible. Some D&D has been done, and unexploded ammunition detonated	Category 5
Nonhazardous\Nonradioactive Waste Sites\ 600-20 Tank Cleaning Site	3.8	Two 3,000-gal tanks held asphalt. Site is adjacent to railroad tracks 300 m west of Route 2. Tanks above ground on concrete cradles. Site is nonhazardous and nonradioactive (Deford 1995). Nearby pit (3 x 3 x 1-m deep) has waste asphalt.	Category 4
Nonhazardous\Nonradioactive Waste Sites\ Power House Ash Pile	4.6	Ash pile about 250 x 60 x 10 ft deep, characteristic of power house ash and probably from coal-fired power houses used at Hanford Construction Camp from 1943 to 1945. Smaller ash pile northwest of large pile.	Category 4
Nonhazardous\Nonradioactive Waste Sites\ Construction Camp Boiler House Ponds	4.7	Eighteen power plants generated steam for construction camp; some had liquid waste disposal ponds for waste water and most likely water softener brine (salt). Ponds are about 60 x 20 x 5 ft deep, filled in with tumbleweeds.	Category 5
Miscellaneous\600-27 Well and Volatile Organics Site	3.5	Inactive monitoring wells (one in which volatile organics were detected). Small amounts of transit and debris in general area, possibly herbicides	Category 4
Miscellaneous\ P-11 Site - Critical Mass Laboratory Site and Crib	3.10	Site of Hanford's first Critical Mass Laboratory and liquid waste crib. Criticality event and fire damaged building and spread plutonium (see below). Building was demolished and removed, as was associated crib. Crib had up to 30,000 dpm (plutonium) in soil on bottom. No contamination found below 3 inches. Laboratory location marked with concrete benchmark. Site released from radiation zone status.	Category 2 with appropriate documentation; if not, Category 4
Miscellaneous\UPR-600-16-P-11 Fire and Contamination Spread	3.11	Unplanned release 600-16. A 1951 fire at Critical Mass Laboratory spread contamination through building and to 180- x 100-ft area around building. Area stabilized with 2 ft of clean soil, which was later removed along with contaminated soil in 1974. Removed from radiation zone status. Unplanned release UPR-600-16 received Hazardous Ranking system score of 16.25	Category 2 with appropriate documentation; if not, Category 4
Miscellaneous\ UPR-600-19 Lime Sulfur Spill	3.13	Wooden barrel of insecticide, abandoned in 1943, rotted and spilled about 100 lb of lime sulfur on ground. Lime sulfur is a topical antiseptic, insecticide, and used to treat mange and scabies. Location is about 1/4 mile west of Route 2 north, between Hanford Townsite and 100-F Area, in front of house foundation. Deford (1995) also reports physical hazards nearby, such as open pits from toilets, collapsing irrigation pipe, and cellar.	Category 5 for lime sulphur spill; Category 1 for physical hazards

Table 2. Summary of Sites Described in the 100-IU-6 Technical Baseline Report (Deford 1995) with Proposed Category Assignments. (sheet 3 of 3)

Site Type\ Facility designation	Section (Deford 1995)	Site Purpose	Proposed Category*
Miscellaneous\ Fumigation Chamber	4.5	Originally a small wooden building protected by barbed-wire security fence. Deford (1995) hypothesizes that fumigation, which may have involved methyl bromide and sulfur dioxide, was used on bedding materials for construction camp. Building and foundation have been removed, site is now grass field.	Category 4
Miscellaneous\ Three Trenches	4.11	Three isolated trenches, with adjacent spoil piles, dug for no known purpose, located about 100 ft west of Avenue A extension.	Category 1
Miscellaneous\ Small Arms Range	4.12	A small-arms target range, about 2 miles from the Construction Camp, operated from mid-1940's through 1950s. Used for handguns, rifles, shotguns, machine guns, hand grenades, etc. Hillside behind target areas laden with expended rounds, mostly lead, with steel, brass, and other metals. Potential risk from unexploded ordinance that might remain.	Category 4

*See document text for description of categories.

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The approach for categorizing the potential for hazardous substance releases and risk for each site was developed through field visits and discussions involving the DOE, Richland Operations Office (RL) and EPA, so that the numerous sites in the two operable units could be categorized logically and consistently. The individual waste sites and groups of waste sites identified in the technical baseline reports for these operable units have been evaluated and assigned to a scoping category as shown in Table 1 (for sites in 100-IU-2) and Table 2 (for sites in 100-IU-6). Because of the nature of the past activities at these operable units, no interim remedial measure (IRM) sites (Scoping Category 3) have been identified. Other sites have been determined to show no potential for past release of hazardous substances (e.g., sites listed because of surface trash or physical hazards).

Definitions for the scoping categories are as follows.

- **Scoping Category 1:** Sites whose existence has been documented (in the case of these operable units, in the technical baseline reports, Carpenter 1995; Deford 1995), but for which there is no evidence of a CERCLA release, and for which there is no evidence of any substantial use or storage of a hazardous substance that could have been released.

Sites in this category include nonhazardous human-generated sites such as holes, depressions, building foundations, and individual household debris dumps. These sites are not subject to CERCLA or *Resource Conservation and Recovery Act of 1976* (RCRA) action, and further evaluation is not required. The existence of potential physical hazards shall be addressed through non-Tri-Party Agreement programs as appropriate.

- **Scoping Category 2:** Sites for which evidence of a prior CERCLA release (or potential release) exists, but which have either been cleaned up or characterization data show to be below cleanup action levels. No further action under CERCLA is required. These sites will be designated in WIDS as already remediated and, based on a risk evaluation, will be proposed for no further action in the proposed plan and record of decision.
- **Scoping Category 3:** Sites where a CERCLA release (or potential release) poses a potential threat to human health or the environment under current land use. These sites would be IRM candidates.
- **Scoping Category 4:** Sites where evidence of a CERCLA release (or potential release) exists, but where there is no apparent threat to human health or the environment under current land use, although such a threat might exist under a different future land use, where public access is not restricted. When future land use decisions are made and the potential uses are known, future risks to human health and the environment will be evaluated and cleanup actions for these sites determined. The schedule for performing

the CERCLA risk evaluation and remedial alternative analysis process for these sites will be agreed to when future land use decisions have been made.

- **Scoping Category 5:** Sites for which there is no specific evidence of a CERCLA release, but at which there may have been a CERCLA release resulting from use, storage, or potential disposal of a hazardous substance. These are sites at which the likelihood of a CERCLA release appears to be low, and no action under CERCLA is likely to be required. However, based on the current risk evaluation, these sites are likely to be proposed for no action in the proposed plan and record of decision. Some of these sites may require confirmatory sampling to support a no-action record of decision.

5.0 SCHEDULE

After public review of this focus package has been completed and future land use has been decided for the operable units, the milestones for identifying any necessary site characterization work and submitting a focused feasibility study and proposed plan will be created as needed. Until a remedy is selected, DOE shall continue to exercise control of and limit access to the 100-IU-2 and 100-IU-6 areas. Any activities that would alter access restrictions or interfere with potential remedial activities, including leasing or otherwise relinquishing control of the 100-IU-2 and 100-IU-6 areas, will occur only with EPA and Washington State Department of Ecology concurrence.

6.0 REFERENCES

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