



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10 HANFORD/INL PROJECT OFFICE
309 Bradley Boulevard, Suite 115
Richland, Washington 99352

May 16, 2011

Mr. Joe R. Franco
Assistant Manager
for the River Corridor
U.S. Department of Energy
Richland Operations Office
P.O. Box 550
Richland, Washington 99352

Re: Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) Milestone
M-016-140

Dear Mr. Franco:

This letter is to confirm that the U.S. Environmental Protection Agency (EPA) is in agreement with the dates for K Area cleanup contained in your May 6, 2011 letter (11-AMRC-0136). Please proceed with the development of draft change packages to submit with the revised Remedial Design/Remedial Action (RD/RA) Work Plans (DOE/RL-2010-53 and 2011-15). The enclosure contains EPA comments on the RD/RA work plans.

If you have any questions, feel free to contact Rod Lobos of my staff at (509)376-3749.

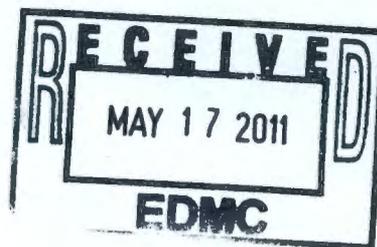
Sincerely,

A handwritten signature in black ink, appearing to read "Dennis Faulk".

Dennis Faulk, Program Manager
Hanford Project Office

Enclosure

cc: Tom Teynor, DOE
Gabe Bohnee, Nez Perce Tribe
Russell Jim, Yakama Nation
Stuart Harris, CTUIR
Ken Niles, ODOE
Jane Hedges, Ecology



Comments for DOE/RL-2010-53

General Comments

It should be stated at the beginning of the document that the 105-K West Demolition and Removal RD/RAWP is following the same path as 105 K East. The document should also account for lessons learned from the K-East work, and this should be explained at the beginning of the document.

The work plan should be reviewed to ensure it is consistent with the governing Record of Decision (ROD) and the ROD amendment. The current documents are not consistent. Temporary storage of sludge is only allowed after it has been treated and waiting for shipment to WIPP.

Specific Comments

- 1) p. 3 line 12 It is not necessary for soil remediation to begin after all of the demolition work scope is completed. Soil remediation should begin when soil is accessible. Both demolition and soil remediation can be done simultaneously.
- 2) p. 17 lines 1 – 6 The activities described in these three bullets should be included in deactivation. These activities are typical of deactivation not demolition. If there is some reason these need to be part of demolition, please explain why.
- 3) p. 22 lines 7-10 Soil remediation efforts may make spraying a soil fixative unnecessary. Soil remediation could be conducted simultaneously with demolition. Work shifting from demolition to soil remediation should be seamless.
- 4) p. 27 line 28 Surveying the excavated area and spraying soil fixative may not need to be "completion criteria" if soil remediation begins before the basin is fully demolished.
- 5) p. 28 The milestone table and the cost schedule table need to be modified to reflect EPA/DOE discussions.

Comments for DOE/RL-2011-15

- 6) p. 7 line 31 Interim storage of sludge before treating is not allowed under the ROD.
- 7) p. 8 line 5-10 Sludge does not have to be interim stored before being shipped; it should be shipped as soon as possible. Sludge should not be interim stored at T-plant before being treated. If the treatment process can only accommodate a limited amount of sludge at a time, then the incidental storing of sludge at T-plant awaiting treatment is acceptable. However, it is not acceptable to plan on storing all of the sludge and then treating it at a later date. This should be corrected in the document.

- 8) p. 19 line 8 Add the words "if needed" after shipment.
- 9) p. 19 lines 16-17 Delete "and placed into interim storage..... in T Plant." This is not consistent with the ROD.
- 10) pp: 33-34 The milestone table and the cost schedule table need to be modified to reflect EPA/DOE discussions.