



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

3100 Port of Benton Blvd • Richland, WA 99354 • (509) 372-7950

November 3, 2009

Mr. Mark S. French, Program Manager
Richland Operations Office
United States Department of Energy
P.O. Box 550, MSIN: A3-04
Richland, Washington 99352

Re: Transmittal of the Signed Waste Site Reclassification Form for the Remaining Sites Verification Package (RSVP) for 100-D-61 and documentation of the Department of Ecology's (Ecology) Comparison of Site Data with Washington Administrative Code (WAC) 173-340 (2007) Requirements

Dear Mr. French:

Enclosed is the signed TPA-MP-14 Waste Site Reclassification Form (enclosure 1) for the 100-D-61, Utility Pole and Fixture Debris Piles for interim reclassification to "Interim Closed Out." Ecology's approval of this interim reclassification is based on the requirements for waste site reclassification identified in the *Remedial Design Report/Remedial Action Work Plan for the 100-Area*, DOE/RL-96-17, Revision 5, which identifies WAC 173-340 (1996) cleanup levels.

In anticipation of the final Record of Decision (ROD) for the 100-D Area, we now evaluate data for consistency with corrective action requirements that will be updated within the final ROD. Therefore, we compared the data in the RSVP for 100-D-61 against WAC 173-340 (2007) requirements (enclosure 2). Ecology will consider this evaluation when the 100-D-61 waste site is evaluated for final reclassification under the final ROD.

If there are any questions, contact Jacqueline Seiple at 509-372-7925 or me at 509-372-7916.

Sincerely,

Mandy Jones
Acting Environmental Restoration Project Manager
Nuclear Waste Program

js/aa
Enclosures (2)

cc: See page 2

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cc w/enc:

Joanne Chance, USDOE
John Neath, USDOE
Megan Proctor, WCH
Stuart Harris, CTUIR
Gabriel Bohnee, NPT
Russell Jim, YN
Susan Leckband, HAB
Ken Niles, ODOE
Administrative Record: 100-D Area
Environmental Portal
Hanford Operating Record General File
USDOE-RL Correspondence Control

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WASTE SITE RECLASSIFICATION FORM		Control Number: 2008-047
Date Submitted: <u>08/27/09</u>	Operable Unit(s): <u>100-DR-1</u>	
Originator: <u>M. L. Proctor</u>	Waste Site Code: <u>100-D-61</u>	
Phone: <u>372-9227</u>	Type of Reclassification Action:	
	Closed Out <input type="checkbox"/> Interim Closed Out <input checked="" type="checkbox"/> No Action <input type="checkbox"/>	
	RCRA Postclosure <input type="checkbox"/> Rejected <input type="checkbox"/> Consolidated <input type="checkbox"/>	

This form documents agreement among parties listed authorizing classification of the subject unit as Closed Out, Interim Closed Out, No Action, RCRA Postclosure, Rejected, or Consolidated. This form also authorizes backfill of the waste management unit, if appropriate, for Closed Out and Interim Closed Out units. Final removal from the NPL of No Action and Closed Out waste management units will occur at a future date.

Description of current waste site condition:

The 100-D-61 waste site is located within the 100-DR-1 Operable Unit and consisted of several piles of loosely sorted construction-related debris staged at ground surface. The piles contained utility poles, railroad ties, light fixtures, scrap wire and cable, scrap construction wood, and other miscellaneous debris. The site has been remediated and presently exists as an open excavation. Remediation and verification sampling of this site have been performed in accordance with remedial action objectives and goals established by the *Interim Action Record of Decision for the 100-BC-1, 100-BC-2, 100 DR-1, 100-DR-2, 100-FR-1, 100-FR-2, 100-HR-1, 100-HR-2, 100-KR-1, 100-KR-2, 100-IU-2, 100-IU-6, and 200-CW-3 Operable Units, Hanford Site, Benton County, Washington* (Remaining Sites ROD), U.S. Environmental Protection Agency, Region 10, Seattle, Washington. The selected action involved: (1) evaluating the site using available process information, (2) remediating the site, (3) demonstrating through verification sampling that cleanup goals have been achieved, and (4) proposing the site for reclassification to Interim Closed Out.

Basis for reclassification:

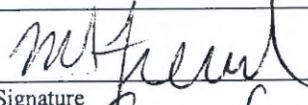
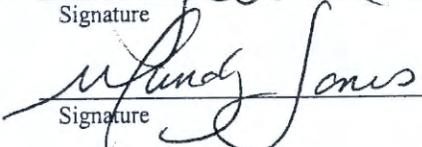
In accordance with this evaluation, the verification sampling results support a reclassification of this site to Interim Closed Out. The current site conditions achieve the remedial action objectives and the corresponding remedial action goals established in the Remaining Sites ROD. The results of verification sampling show that residual contaminant concentrations do not preclude any future uses (as bounded by the rural-residential scenario) and allow for unrestricted use of shallow zone soils (i.e., surface to 4.6 m [15-ft-] deep). The results also demonstrate that residual contaminant concentrations are protective of groundwater and the Columbia River. Site contamination did not extend into the deep zone soils; therefore, institutional controls to prevent uncontrolled drilling or excavation into the deep zone are not required. The basis for reclassification is described in detail in the *Remaining Sites Verification Package for the 100-D-61 Utility Pole and Fixture Debris Pile* (attached).

Regulator Comments:

Approval of the WSRF documents regulator agreement that the 100-D-61 waste site qualifies for "Interim Closed Out" under the Interim Action ROD. In addition, Ecology has evaluated the data for this site against WAC 173-340 (2007) clean-up levels for direct contact, groundwater protection, and river protection. This evaluation is documented in the letter transmitting Ecology's approval of this site's interim reclassification to "Interim Closed Out."

Waste Site Controls:

Engineered Controls: Yes No Institutional Controls: Yes No O&M Requirements: Yes No
 If any of the Waste Site Controls are checked Yes, specify control requirements including reference to the Record of Decision, TSD Closure Letter, or other relevant documents.

M. S. French DOE Federal Project Director (printed)	 Signature	10/21/09 Date
M. Jones Ecology Project Manager (printed)	 Signature	10/22/09 Date
N/A EPA Project Manager (printed)	Signature	Date

Enclosure 2

The Department of Ecology's Comparison of Supporting Data for the 100-D-61 Remaining Sites Verification Package (RSVP) with WAC 173-340 (2007) Requirements

Overall summary: Based on 1996 cleanup levels, 1 contaminant exceed the RAGs; RESRAD has been used to predict that Barium and Benzo(a)anthracene won't reach groundwater. 2001/2007 MTCA cleanup levels are exceeded for one contaminant. Additional evaluation of contaminants exceeding ecological risk screening values is necessary for final action.

Summary of Exceedences (Yes = concentration exceeds cleanup/screening level)

Contaminant	Groundwater Protection (1996)	River Protection (1996)	RESRAD (Kd ml/g)	WAC 173-340 Ecological Protection	WAC 173-340 Human Health (2007)
Barium	No	No	Pass (25)	Yes	No
Boron	No	--	--	Yes	No
Chromium VI	No	No	--	No	Yes
Selenium	No	No	--	Yes	No
Benzo(a)anthracene	Yes	Yes	Pass (25)	--	No

Note: This table does not include contaminants with soil concentrations below background or the PQL. When soil concentrations are less than background or the PQL, cleanup levels default to background or the PQL.

Outstanding Issues:

- State eco-risk screening levels exceeded for antimony (<background), barium, boron, manganese (<background), selenium, vanadium (<background), and zinc (<background).
- MTCA 2001/2007 levels are exceeded for hexavalent chromium.
- In the RSVP, a percentile was not provided, for background data that corresponds with the high barium values in some of the verification samples (values such as 150, 173, 204 and 380 mg/kg).
- Boron concentrations are relatively high at the site, with values of up to 31 mg/kg (Phase II). The concentrations exceed 0.5 mg/kg for protection of plants. The RSVP mentions examining additional lines of evidence. Only a small percentage of RCBRA Upland sites had values exceeding the maximum for this site, limiting the number of lines of evidence available. This further encourages evaluation of a Hanford-specific (or river corridor) background value for boron.
- Aroclors 1254 and 1260 exceed soil concentrations for protection of surface water based on WAC 173-340 (2007) for Phase I sample location 9 (Aroclor-1254) and Phase I sample location 8 (Aroclor-1260). The protective concentrations are 1.71E-03 mg/kg (Aroclor-1254) and 3.32E-02 mg/kg (Aroclor-1260). This represents 10% of sample locations for each of Aroclor-1254 and -1260.