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STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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June 14, 1999

Mr. Bryan Foley  
U.S. Department of Energy  
P.O. Box 550, MSIN: HO-12  
Richland, Washington 99352

Dear Mr. Foley:

Re: Washington State Department of Ecology Comments on the *200-CW-1 Operable Unit RI/FS Workplan and 216-B-3 RCRA TSD Unit Sampling Plan, DOE/RI-99-07, Draft A*

Enclosed for your review and resolution are the Washington State Department of Ecology's (Ecology) comments on the above subject document. The document requires modification prior to public comment.

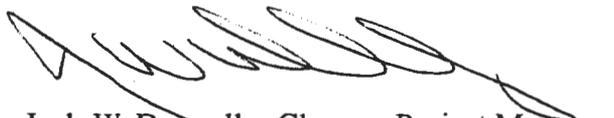
For convenience, Ecology separated the comments into three (3) areas: general, specific, and administrative. We are asking for written responses to Ecology's general and specific comments only. The administrative comments are provided for information to improve the document.

Ecology encourages the U.S. Department of Energy (USDOE) to proceed with the field investigations prior to the actual approval of the workplan should carryover funds be available for expediting fieldwork, well installations, or sampling.

Ecology will work with USDOE to resolve the comments. We are aware of funding problems associated with the project; however, Ecology will not dismiss developing milestones to implement this workplan. USDOE should proceed in developing a Tri-Party Agreement Milestone Change Package for milestones to implement Section 6, while the enclosed comments are being resolved.

If you have any questions, please contact me at (509) 736-3013.

Sincerely,



Jack W. Donnelly, Cleanup Project Manager  
Nuclear Waste Program

cc: Michael Graham, BHI  
Dennis Faulk, EPA  
Dirk Dunning, OOE  
Administrative Record: 200-CW-1 Operable Unit and 216-B-3 RCRA TSD (D-2-5)



London

bcc: Laura Cusack, Ecology  
Phil Staats, Ecology  
Ted Wooley, Ecology



# Official Ecology Comments on DOE/RL-99-07 Draft A 200-CW-1 Work Plan and 216-B-3 RCRA TSD Unit Sampling Plan

## General Comments

1. The entire document lacks standard terminology for authorizing RCRA TSD closure actions and the decision mechanism. A thorough search needs to occur to establish a unified approach for implementing the RCRA TSD closure as well as the CERCLA process. Most sections concentrate only on the CERCLA decision process rather than a combination of RCRA and CERCLA. Ecology is disappointed that after the development of the *200 Area Implementation Plan* and the flow-charts that we must make this point in the workplan.
2. The workplan references a closure plan (200-BP-11) and other documents (i.e., Aggregate Management Studies) which have not been approved. They are effectively moot documents that focus on past actions/failures, and provide no decision-making matrix or a path forward for the future investigations and eventual cleanup of these waste sites and TSD units. Use appropriate information from these documents in this workplan relative to the waste sites and TSD unit and delete the references. Furthermore, Sections 2 and 3 of a Closure Plan are not readily apparent in this workplan as described in the *200 Area Implementation Plan*. This workplan must solely include the "Facility Description and Location Information" and "Process Information" sections of a Closure Plan and can not be referenced.
3. Milestone 20 is entirely omitted from the document. This milestone describes the overall requirement for all closure plan submittals. This further amplifies the lack of RCRA terminology to foster good communication and integration.
4. Discussing preliminary remedial alternatives in a workplan is useful information but Ecology must have a statement in the workplan that these will be further developed and agreed to in the Focused Feasibility Study, Proposed Plan, and eventual Record of Decision and Permit Modification. Approval of this workplan DOES NOT constitute approval of the listed alternatives as described. Include language in the beginning of the workplan to explain this aspect or delete all language regarding the alternative analysis.
5. Ecology WILL NOT use the approval of the workplan to constitute as a contained-in-determination for hydrazine. Ecology accepts the workplan for identifying this as a need and the determination will be through alternate correspondence and will not hold up the investigation schedule.
6. The Project Schedule is not adequate to approve the workplan. An enforceable schedule with proposed milestones for the start of investigative work, RI report,

FS report, Closure Plan, and Proposed Plan must be included. The workplan must state the USDOE shall submit a Tri-Party Agreement (TPA) Class II change request to Ecology for approval.

7. Appendix A, the Sampling and Analysis Plan contains columns in Table A2-1 under the "Preliminary Action Levels" for radionuclides that are inappropriate at this time and will require further development. Delete the "Indus, Cons, CI/Close" terms.
8. The document needs extensive work in critical areas prior to public review. The document generally follows the Implementation Plan but does not flow well. Ecology wishes to resolve the comments as soon possible. Ecology is willing to allow field investigative work to proceed in parallel with public review to take advantage of available funding and scheduling should that be necessary.

### Specific Comments

1. Page 1-1, 1<sup>st</sup> paragraph: Explain that this operable unit consists of 28 waste sites that includes 4 TSD units, and 24 RPP waste sites and that different regulatory pathways exists but through integration efforts this workplan will streamline the process and will satisfy the requirements of the various regulations.
2. Page 1-1, 1<sup>st</sup> paragraph: The introduction should describe the facilities that generated the cooling water. Also, clarify that the unplanned releases can include the failure of equipment in the facilities leading to unplanned releases of radioactive materials to the trenches, ditches, and ponds. Unplanned releases historically have included minor spills outside of facilities that have little or nothing to do with the facility. Please provide the clarification.
3. Page 1-1, 3<sup>rd</sup> paragraph: Include a discussion on the M-20 milestone and the proposed milestones stated in the general comments.
4. Page 1-1, Section 1.1, 1<sup>st</sup> paragraph: Add language to include options for remedial actions that may only address some waste sites in the Operable Unit rather than every waste site in the Operable Unit. Records of Decision may include multiple waste groups. Additionally, add language to address general comment number 4.
5. Page 1-1, Section 1.1, 2nd paragraph, last sentence: Add waste management to the text.
6. Page 1-1, Section 1.1, 3rd paragraph: No RCRA language exists for the Closure Plan and Permit Modification. Add necessary text. See general comment 1.
7. Page 1-3, Figure 1-1: Public involvement (PI) requirements for the RCRA closure plan need modification. The first block indicates that chapters 2, 3, 4, and 5 of the Closure Plan will be included in the RI/FS work plan. The third block indicates

that chapters 6, 7, and 8 will be addressed in the FS/Closure Plan. The FS/Closure Plan is one of the documents to be available through the administrative record for public review. The problem with dividing the chapters between the workplan and the FS/Closure Plan is that not all closure chapters will be subjected to public review.

8. Page 2-4, Section 2.2, 1<sup>st</sup> paragraph: Add the TPA to the first sentence.
9. Page 2-4, Section 2.2, 1<sup>st</sup> paragraph, last sentence: Table 2-1 has 24 RPP sites. Change the "Twenty-six" to "Twenty-four."
10. Page 2-4, Section 2.2, 2<sup>nd</sup> paragraph: The detailed description of the facilities and processes must be in this workplan and not referenced. These portions fulfill Sections 2 and 3 of a Closure Plan as stated in Figure 1-1. Also see general comment 2.
11. Page 2-5, Section 2.2, 4<sup>th</sup> paragraph: The number of RPP sites and TSD units does not match Table 2-1.
12. Page 2-5, Section 2.2, 5<sup>th</sup> paragraph, last sentence: Change to a positive statement that the integration allows for addressing all contaminants, including radiological, and that the original Closure Plan did not consider radiological contaminants, and was not required to be based on RCRA.
13. Page 2-6, Section 2.2.2, 2<sup>nd</sup> paragraph, 2<sup>nd</sup> sentence: Change "may be" to "will be."
14. Page 2-7, Section 2.2.2, 4<sup>th</sup> paragraph: Change to state that the analogous approach is applied to RPP sites only - not the representative site approach.
15. Page 2-7, Section 2.2.2.1: Include the borehole data from 1998 in this section since the section is describing the waste site descriptions and history.
16. Page 2-8, 1<sup>st</sup> paragraph: Delete the sentence "A draft closure plan for ... 1990)."
17. Page 2-8, 2<sup>nd</sup> paragraph: Clarify this paragraph to ensure that the 200-BP-11 Closure Plan is not longer applicable and that a new Closure Plan and integration with 200-CW-1 is the regulatory path forward. As written, it leads one to believe that another Closure Plan exists and will be implemented.
18. Page 2-26 to 2-29, Table 2-1: Table is incomplete and should include the Source Facility for each waste site.
19. Page 3-8, 2<sup>nd</sup> paragraph, last sentence: Delete sentence; see general comment 5.

20. Page 3-10, Section 3.3.3.4: Include the current monitoring wells (network), well numbers, monitoring frequency, and mode of monitoring as stated in the most recent ICN.
21. Page 3-10, Section 3.3.3.5: Add a conclusion statement whether B-3 pond did or did not contribute to the groundwater contamination. If so, then clearly identify which contaminants.
22. Page 5-1 – 5-2, Section 5.1: The integration process is missing all RCRA language regarding the Closure Plan and Permit Modification. See general comment 1.
23. Page 5-2, 1<sup>st</sup> paragraph: This paragraph lists the closure chapters (chapters 1-4) that will be provided within this work plan. This contradicts Figure 1-1, which indicates chapters 2-5.
24. Page 5-2, Section 5.1, 2<sup>nd</sup> paragraph: This paragraph discusses satisfying the requirements for a CMS report. Please add clarifying language.
25. Page 5-2, Section 5.1, 1<sup>st</sup> paragraph: Ecology was unable to clearly identify within this workplan where the facility description and information as well as the process information are contained. Throughout the document there were statements showing that this section will serve for the Closure Plan. See general comment 2.
26. Page 5-2, Section 5.1, 3<sup>rd</sup> paragraph: This paragraph is incorrect. A ROD will not be used to authorize a TSD Closure. The Closure Plan and Permit Modification accomplish this. The ROD allows for more economical disposal, addressing all contaminants, and for scheduling/planning (i.e., milestones).
27. Page 5-6, Section 5.2.5.3: This section needs more discussion relative to whether quantitative risk assessments may be useful and why. Earlier, 100 Area qualitative risk assessments (QRA's) needed much improvement, and the 200 Area QRA's should learn from past actions. This should be discussed further.
28. Page 5-6, Section 5.3: Closure performance standards are determined in the Closure Plan and Permit Modification. It is critical to identify the performance standards as early as possible. This could happen at various stages, and not just at the feasibility stage. Modify the text to allow more flexibility in the timing for developing closure performance standards.
29. Page 5-7, Section 5.3, number 6: The remedial action alternatives do not address RCRA Closure terminology such as landfill, modified closure, clean closure and a description of those terms. Include a discussion on these items. See general comment 4.

30. Page 5-7, number 6: Explain the origin of the criteria, and provide an explanation of the NEPA values.
31. Page 5-8, Section 5.4, 1<sup>st</sup> paragraph: This paragraph is incorrect. A ROD will not be used to authorize a TSD Closure. The Closure Plan and Permit Modification accomplish this. The ROD allows for more economical disposal, addressing all contaminants, and for scheduling/planning. See general comment 1.
32. Page 5-9, Section 5.5, 1<sup>st</sup> paragraph: This paragraph is incorrect. A ROD will not be used to authorize a TSD Closure. The Closure Plan and Permit Modification accomplish this. The ROD allows for more economical disposal, addressing all contaminants, and for scheduling/planning. See general comment 1.
33. Page 5-9, Section 5.5, 2<sup>nd</sup> paragraph: The integration process is missing all RCRA language regarding the Closure Plan and Permit Modification. See general comment 1.
34. Page 5-9, Section 5.5, 2<sup>nd</sup> paragraph, last sentence: Delete this sentence. Closeout activities will be specified in the ROD and RD/RA workplan and Permit conditions; not as identified in the *200 Area Implementation Plan*.
35. Page 6-1, 1<sup>st</sup> paragraph: The integration process is missing all RCRA language regarding the Closure Plan and Permit Modification. See general comment 1.
36. Page 6-1, 2<sup>nd</sup> paragraph: See general comment 6 and add text to submit a change request.
37. Appendix A: The organic methods may create data on contaminants not listed as Contaminant of Concern (COC) list. Add text to show how this information will be handled and how new COC's will be dealt with.
38. Page A1-2, 3<sup>rd</sup> paragraph, Appendix A: Any past data generated from building a road across this ditch should be included and results discussed.
39. Page A2-9, Appendix A: Since this is a TSD, Land Disposal Restriction (LDR) action levels should also be looked at. Further discussions are necessary on the RESRAD look up values for radionuclides and what levels will be used.
40. Page B-2, Waste Control Plan, Non-Regulated Material Disposal Location(s): Liquid disposal language needs to be adjusted to reflect the options specified in the revised Investigative Derived Waste (IDW) strategy.
41. Appendix C: A more recent revision of Part A, Form 3 for the 216-B-3 Pond exists and should be included (Revision 6). Additionally, the figure on page 6 of 7 shows the TSD boundary. The boundary map does not show the entire footprint. Although there is a legend note indicating where the boundary extends, it is

unclear whether the concrete structure is part of the TSD boundary or if the boundary stops at the concrete structure. Provide a complete map with the boundaries.

### **Administrative Comments**

1. Page 1-1, 1<sup>st</sup> paragraph, 3<sup>rd</sup> sentence: Delete the word "also."
2. Page 1-2, Section 1.2: Move entire section to after the introduction.
3. Page 2-10, Section 2.3: Move entire section to Section 2.2.1.