



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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Mr. Kevin Bazzell
U.S. Department of Energy
Richland Operations Office
P.O. Box 550, MSIN A3-04
Richland, Washington 99352

Re: Comments on Draft *Action Memorandum #3 for the 300 Area Facilities*

Dear Mr. Bazzell:

I would like to thank you for the chance to review the Draft *Action Memorandum #3 for the 300 Area Facilities* (AM#3). The progress of the ongoing removal actions in the Hanford 300 Area has been impressive. I look forward to continued progress as the work proceeds on facilities in the southern portion of the 300 Area. Preliminary comments on AM#3 were delivered by hand to Rudy Guercia, of your staff, on October 18. I have some general comments that are related below.

1. The acceleration of the D4 process in the 300 Area by Washington Closure Hanford has so far been very successful. The planned streamlining of building characterization with the D4 process may save more time and money in the future. The Endangerment Determination (section 4.0 of AM#3) states that this removal action is necessary to protect public health or welfare or the environment from the substantial threat of release of hazardous substances. The list of "potentially contaminated" facilities included in AM#3 is somewhat in conflict with this "substantial threat of release" determination. CERCLA §104(a)(3) states that action will not be taken for a release from products which are part of the structure of, and result in exposure within a building or structure. It is currently unknown if there is a substantial threat of release from the potentially contaminated list of facilities. It is the Department of Energy's responsibility to ensure that buildings are removed under proper authority. At this time, buildings demolished under authorization other than CERCLA may not be disposed of in the Environmental Restoration Disposal Facility (ERDF).

2. Facilities currently occupied by Pacific Northwest National Laboratories (PNNL) that are being considered for long-term use should be removed from AM#3. Although there is no official decision on the long-term occupation of these facilities, there is no imminent threat of release while the facilities are in use. Facilities that will need to be maintained to support possible long-term PNNL functions should also be removed from AM#3 lists. If a decision is made to excess these facilities within the next few years, another action memorandum can be written based off of the existing EE/CA #3. Some

updates to cost estimates would need to be made, but this would be relatively simple to perform. A short explanation of the omission should be inserted into AM#3.

3. In the summary of potentially contaminated facilities (page 8 of AM#3) one facility is listed as MO-XXX for miscellaneous mobile trailers that may yet be installed. Please delete this item. It should not be assumed that future structures will become contaminated in a manner that will present an imminent threat of release of hazardous substances to the environment. If such contamination does occur in the future, it can be dealt with by future authority.

4. Section 5.3.2 has a discussion about control and monitoring of emissions on page 20 of AM#3. The last sentence includes the phrase, "...once the removal action is initiated under an EPA-approved air monitoring plan." Please add some specificity to what constitutes initiation of the removal action to this section. The selected removal action is deactivation, decontamination, decommission, and demolish (D4). Surveillance and monitoring prior to initiating D4 is not part of the CERCLA action.

5. The final paragraph in section 5.3.2 regarding the radiological counting facility (RCF) should be deleted from AM#3. If the RCF has an existing permit for releases to the environment, it is not considered an onsite facility under CERCLA §104(d)(4). Current operations prior to initiation of D4 are not part of the removal action authorized by AM#3 and will continue with any existing permitting until such operations cease.

If you have any questions concerning these comments or the 300 Area in general, feel free to contact me at 509-376-4919.

Sincerely,



Alicia L. Boyd
300 Area Project Manager

cc: Rick Bond, Ecology
Administrative Record: 300 Area Facilities