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U.S. ENVIRONMENTAL PROTECTION AGENCY REGION 10

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Hanford Project Office
Federal Building, Rm. 178
P.O. Box 550, A7-70
Richland, Washington 99352

August 3, 1989

REPLY TO
ATTN OF: A7-70

Roger D. Freeberg, Chief
Restoration Branch
U.S. Department of Energy
P.O. Box 550 (A6-50)
Richland, Washington 99352

Re: Review of Environmental Investigations and Site
Characterization Manual

Dear Mr. Freeberg:

Enclosed are the Environmental Protection Agency's comments on the referenced manual which was submitted April 27, 1989. We read the comments made by the Department of Energy's consultants and, to the best of our ability, tried not to duplicate these comments. As such, we strongly recommend that the consultant's comments be given serious consideration by the authors of this manual. Our comments are detailed in two enclosures to this letter. Enclosure 1 is a review conducted by U.S. Geological Survey and Enclosure 2 is a review conducted by Planning Research Corporation-Environmental Management.

Although the purpose and objective of the manual was not stated, we assumed that this was to be a detailed discussion of the standard techniques to be used by Hanford Site personnel in conducting the site characterization tasks at the Remedial Investigation of the CERCLA and RCRA sites, the purpose of which was to reduce redundant discussion of investigation techniques in each individual work plan. With a few notable exceptions, such as a generally acceptable discussion of aquifer testing in Section 10.0, this document falls far short of this objective.

In its present form, the document primarily describes project management techniques such as assignment and delegation of responsibilities, report tracking procedures, and technical oversight without committing to or giving details of individual technical procedures such as well drilling, well completion, and borehole geophysics. In fact, the characterization manual contains no discussion nor does it acknowledge the use of surface geophysics, groundwater sampling, or soil-gas sampling--all of which are important site characterization techniques proposed in each of the three RI/FS work plans we have reviewed so far.

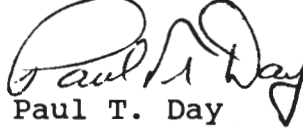


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In conclusion, we recommend a thorough revision of this manual to incorporate the comments from your consultants, to include detailed documentation of the site characterization techniques described above, and to include the comments specified in the two enclosures.

If you have questions or comments, please contact me at (509) 376-6623.

Sincerely,



Paul T. Day
Hanford Project Manager

Enclosures

cc: (with enclosure) .
Roger Stanley, Ecology
George Hofer, EPA
✓ Jack Waite, WHC
Ward Staubitz, USGS
Emily Pimentel, PRC
Administrative Record: General Reference File -- EIIs

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Subject
REVIEW OF ENVIRONMENTAL INVESTIGATIONS AND SITE CHARACTERIZATION MANUAL

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