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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10 HANFORD PROJECT OFFICE  
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RICHLAND, WASHINGTON 99352

January 17, 1995

Jeffrey M. Bruggeman  
100-KR-1 RL Monitor  
U.S. Department of Energy  
P.O. Box 550, H4-83  
Richland, WA 99352

Re: Regulator Comments: 100-KR-1 Operable Unit Focused Feasibility Study Report, DOE/RL-94-66, Draft A <sup>39199</sup>

Dear Mr. Bruggeman:

Enclosed are comments from the U.S. Environmental Protection Agency on the above mentioned document. If you have any questions, please contact me at (509) 376-9884.

Sincerely,  
*Laurence E. Gadbois*  
Laurence E. Gadbois  
100-K Area Unit Manager

Enclosure:  
Regulator Comments: 100-KR-1 Operable Unit Focused Feasibility Study Report, DOE/RL-94-66, Draft A

cc: Alan Krug, BHI  
Steve Wisness, DOE  
Dave Holland, Ecology  
Roger Stanley, Ecology  
Administrative Record, 100-KR-1, 100-KR-4



Mr. Jeff Bruggeman

January 17, 1995

Enclosure:

Regulator Comments: 100-KR-1 Operable Unit Focused Feasibility Study Report, DOE/RL-94-66, Draft A

General Comment:

The Tri-Parties are currently engaged in discussions regarding the format of the 100-Area Source Operable Unit Focused Feasibility Study (FFS) Reports, specifically in connection with 100-BC-1, 100-DR-1, and 100-HR-1. The result of those discussions should serve as the template for the next revision of this 100-KR-1 FFS report. Therefore, only the data specific portions of this 100-KR-1 FFS document have been included in this review. For clarity, the following provides a listing of the sections that were and were not reviewed.

<u>Section</u>	<u>Reviewed</u>	<u>Not Reviewed</u>
1.0		X
2.1		X
2.2	X	
2.3-4		X
Fig 2-1	X	
Table 2-1,2	X	
Table 2-3,4		X
Table 2-5-10	X	
Table 2-11		X
3.0		X
4.0		X
5.0		X
6.0		X
App A		X
App B		X

Specific Comments:

1. Page 2-2, 1st bullet, especially the last 5 lines

This section needs to be updated. There has been a recent update to the listing status of several species that frequent the Hanford site. This update needs to be reflected in this section. The status of the species used in the documents that are cited are outdated.

The Bald Eagle Management Plan is outdated. Please use the "Bald Eagle Site Management Plan for the Hanford Site, South-Central Washington", DOE/RL-94-150, Revision 0.

There are also other Hanford documents that are relevant to this discussion. Some examples are the "Risk Evaluation of Remedial Alternatives for the Hanford Site", DOE/RL-93-54, Draft A; and the "Sitewide Biological Resources Management Plan", (in preparation).

2. Table 2-1

It would be informative to footnote 116-KW-3 and 116-KE-4 something to the effect that "the above ground steel structure is currently being removed under the D&D program".

It would be informative to footnote 116-K-3 and the "Process Effluent Pipelines" something to the effect that "the in-river portion of the pipelines and up to and including the 116-K-3 outfall structure are part of an expedited response action".

3. Table 2-2

For the second entry "116-K-2" under the "use" column, hydride tanks are mentioned. We do not recall any previous mention of these tanks in the 100-KR-1 Administrative Record documentation. Some discussion of these tanks, (contamination, risks etc) needs to be provided. This could be done as a footnote to the table.

4. Tables 2-5 through 2-10

We are troubled that the authors choose to include essentially only the radioactive contaminants. When and who decided to not include most of the metals data? This omission results in a convenient method to drop them as contaminants of concern. (We note that a total of 11 non-radiological data points are included for all the waste sites in these six tables.)

We have repeatedly expressed concern with the high levels of chromium in the groundwater reaching the Columbia River in the 100-K area. Unfortunately time and again the DOE fails to acknowledge the concern. This document is yet another example.

As an example, draft "A" of the proposed plan for 100-KR-4, proposes no action for the contamination in the aquifer. Now this document drops chromium as a contaminant of potential concern. The 100-KR-4 draft "A" proposed plan proposes points of compliance (near-river wells) and PRGs nearly five times more contaminated than the legal limit, yet when contaminants are consistently measured many time those PRGs in those wells, DOE responds with a preferred alternative of institutional controls and continued current actions (studies). Institutional controls and studies are what has been going on at the 100-K area for decades, and it has not been protective of the groundwater flowing into the Columbia River.

With the omission of metal and inorganic data, it makes a detailed review of much of the rest of the document fairly pointless. Detailed analysis of remedial alternative costs and volumes, treatment effectiveness, et cetera are of limited value if only a portion of the contaminants are addressed.

5. Conclusion

When this document is re-done in response to ongoing discussions for the 100-HR-1 FFS, and the rest of the non-radiological data is included, we plan to do a more in-depth review.