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Department of Energy

Richland Operations Office
P.O. Box 550
Richland, Washington 99352

SEP 29 1995

Mr. Douglas R. Sherwood
Hanford Project Manager
U.S. Environmental Protection Agency
712 Swift Boulevard, Suite 5
Richland, Washington 99352

Mr. Roger F. Stanley
Tri-Party Agreement Implementation
State of Washington
Department of Ecology
P.O. Box 47600
Olympia, Washington 98504-7600



Dear Messrs. Sherwood and Stanley:

TRANSMITTAL OF SCHEDULE FOR 200-BP-11 OPERABLE UNIT (OU) RESOURCE CONSERVATION AND RECOVERY ACT (RCRA) FACILITY INVESTIGATION (RFI)/CORRECTIVE MEASURES STUDY (CMS) AND 216-B MAIN POND, 216-B TRENCH AND 216-A-29 DITCH WORK/CLOSURE PLAN, VOLUME 1: FACILITY INVESTIGATION AND SAMPLING STRATEGY (DOE/RL-93-74, DRAFT B) WORK PLAN

40985

References:

- (1) RL ltr. to P. R. Beaver, EPA and B. L. Foley, RL, from N. T. Hepner, Ecology, same subject as above, (Ltr. No. 020157), dtd. August 30, 1995.
(2) RL ltr. to B. L. Foley, RL, from N. T. Hepner, Ecology, same subject as above, (Ltr. No. 018569), dtd. July 20, 1995.

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On September 1, 1995, the U.S. Department of Energy, Richland Operations Office (RL) received a letter from the State of Washington Department of Ecology (Ecology) that indicates their intent to initiate dispute resolution to determine an acceptable schedule for the 200-BP-11 OU RFI/CMS and 216-B-3 Main Pond, 216-B-3 63 Trench, and 216-A-29 Ditch Work/Closure Plan, Volume 1: Facility Investigation and Sampling Strategy (DOE-RL-93-74, Draft B). RL is committed to working with Ecology and the U.S. Environmental Protection Agency to develop an acceptable schedule to complete the work at the 200-BP-11 OU, considering the overall strategy and priority for conducting environmental restoration activities at the Hanford Site.

Attached for your review and approval, is RL's proposed 200-BP-11 Work/Closure Plan implementation schedule. Characterization will be conducted in Fiscal Years 1997 and 1998, and the CMS Report/Proposed Plan, will be submitted to the regulators in September 1999. The RL proposes the following be established as interim milestones for the 200-BP-11 OU:

(1) Submit Validated Data for Fiscal Year 1997 Characterization Activities to the Regulators, September 1997, (2) Submit Validated Data for Fiscal Year 1998 Characterization Activities to the Regulators, September 1998, and (3) Submit the CMS Report/Proposed Plan, September 1999. This schedule supports the Hanford Facility RCRA Permit schedule, which provides for inclusion of the 216-B-3 Main Pond, 216-B-63 Trench, and 216-A-29 Ditch into the year 2000 permit modification. Characterization work on the 200-BP-11 OU is scheduled in Fiscal Year 1997; this allows time for the Tri-Parties to develop a implementation plan to complete the 200 Area remedial action workscope based on projected resources and work priorities. A determination must be made whether, within the scope of the Hanford Federal Facility Consent Order (Tri-Party Agreement), implementation of all or a part the 200-BP-11 OU work scope is a near-term priority.

Funding for the 200-BP-11 OU Work/Closure Plan implementation has not been identified in the current Multiyear Work Plan. Implementation of the workscope identified in the 200-BP-11 OU Work/Closure Plan will impact the progress of high-priority remedial action work in the 100 or 300 Area Projects. The initial estimate for the 200-BP-11 OU Work/Closure Plan scope is approximately \$4.3 million dollars (see Attachment 2). Attachment 2 lists the workplan activities and associated initial cost estimate. This estimate gives the Tri-Parties a general understanding of the magnitude of the work identified for the 200-BP-11 OU. The estimate will be refined after the Tri-Parties have agreed to the overall operable unit schedule. In the event the regulatory agencies decide to direct implementation of the 200-BP-11 work scope described in the Work/Closure Plan, RL requests a follow-on decision regarding what work scope in the 100 and 300 area remedial action projects may be delayed. Please be aware that RL does not agree with this prioritization, but if directed by the regulators to implement, RL will exhaust all efforts to comply.

Ecology has stated in a July 20, 1995, letter to RL that certain future Tri-Party Agreement milestone commitments are based on successfully demonstrating that RCRA and the Comprehensive Environmental Response Compensation, and Liability Act (CERCLA) can be coordinated at the 200-BP-11 OU. A degree of success has already been demonstrated by combining the workplan and closure plan into one document. This work/closure plan identifies a blueprint to coordinate past practice and RCRA closure requirements for the 200-BP-11 OU project. The Tri-Parties have agreed to this approach, which is also being used for the N Area Pilot Project. The RL believes that, upon approval of the 200-BP-11 OU Work/Closure Plan, successful coordination will have been demonstrated, and that completion of the 200-BP-11 OU CMS Report is not necessary to demonstrate successful coordination of past practice and RCRA closure. Therefore, the schedule does not reflect completing the CMS Report by September 1997 as recommended by Ecology.

Messrs. Sherwood and Stanley

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SEP 29 1995

If you have any questions, please feel free to contact Mr. Bryan L. Foley on 376-7087.

Sincerely,



Paul F. X. Dunigan, Jr.
Hanford Project Manager

Attachments

cc w/attach:

D. L. Lundstrom, Ecology
P. R. Beaver, EPA

cc w/o attach:

G. R. Eidam, ERC
G. C. Henckel, ERC
R. K. Tranbarger, ERC
J. G. Woolard, ERC

200-BP-11 OPERABLE UNIT WORK/CLOSURE PLAN IMPLEMENTATION
COST ESTIMATE (FY 1996 DOLLARS)

ACTIVITY	DESCRIPTIONS./ASSUMPTIONS	COST (1,000'S)
Prepare Planning Documents	3 DOWs, RWP, HWOP, Excavation Permits, NEPA, Ecological/Cultural Review, Waste Management Plan	91
Pipeline Integrity Assessment (1)	3300 ft. with rad survey	103
GPR	1 day/survey, 3 surveys total	19
Geodetic Survey	Location of pipelines, surveys, wells, etc.	19
Air Sampling	Portable air samplers around boreholes and test pits.	29
Cone Penetrometer (2)	CPT in 3 areas, 10 holes per area, to 45 feet, includes labor (minimal) and contractor costs.	328
15 Test Pits	4 days/pit, 30/test pit. Includes all labor, supplies, and equipment rental	465
8 Boreholes (3)	3 boreholes to 250 feet; 5 boreholes to 60 feet. Includes all labor and contractor costs	843
Geophysical Logging	Log 7 existing boreholes, log 8 new boreholes	150
Sample Analysis and Validation (Chemical and Radiological) (4)	276 samples (23 sample delivery groups [SGD], 12 samples/sample delivery group). 5 SDGs receive stand-alone deliverables that are validated. 17 SDGs receive summary deliverables that are not validated. 1 SDG is analyzed for rad only, and receives a summary deliverable.	1452
Physical Properties Testing (5) (6)	89 samples type A analysis 21 samples type B analysis	225

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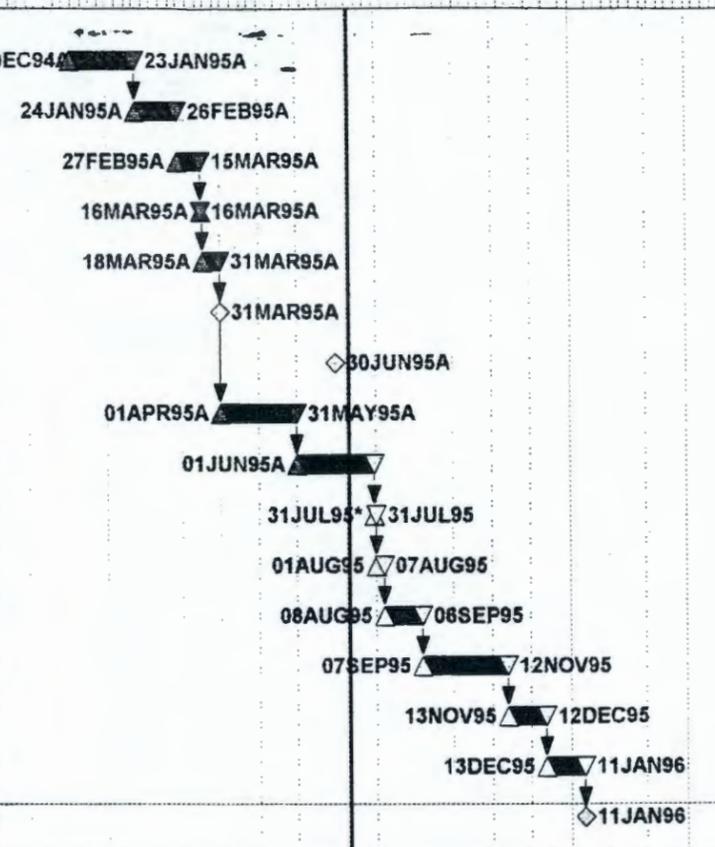
Ongoing Data Evaluation, Risk Analysis, ARARs	Evaluate ongoing data collection, compare to risk based standards.	46
Facility Investigation Report	Document field investigation	310
CMS/PP	Evaluate cleanup options and selected remedy/closure option	335
TOTAL COST (7) (8) (9) (10)		4415

ADDITIONAL ASSUMPTIONS:

- (1) Pipeline Assessment: Assumes that no additional surface samples or test pits will be required as a result of this survey.
- (2) Cone Penetrometer: Assumes that the rods are left in place.
- (3) Boreholes: Assumes none of the boreholes will encounter a perched aquifer that would require the borehole to be completed as a groundwater monitoring well.
- (4) Analytical methods: Arsenic (7060), ICP metals (6010), Mercury (7471), Tin (7870), SemiVoa (8270), Ammonia (350.1), Cyanide (9010), Anions (300), NO2/NO3 (353.1), VOA (8240), Gross Alpha/Beta, Gamma Scan, Am-241/Cm-244, Neptunium 237, Iso Plutonium, Pu-241, Thorium 230/232, Iso Uranium, I-129, Sr-90, Tc-99, Se-79.
- (5) Physical Properties Testing: Type A - Particle Density, Particle Size Distribution, Bulk Density/Moisture Content, pH, Calcium Carbonate. Type B - All Type A Plus - Saturated Conductivity, Unsaturated Conductivity, Soil Moisture Retention Drying Curve, Cation Exchange, Organic Carbon Content, and Mineralogy.
- (6) Physical Properties Testing: Assumes physical properties samples are not archived.
- (7) Total Cost: Assumes that no additional surface radiation surveys will be conducted; surveys provided by the ongoing surveillance and maintenance activities will be adequate.
- (8) Total Cost: Assumes that IDW is stored onsite.
- (9) Total Cost: All costs include project management, oversight, overhead, direct distributables. Borehole drilling is the only activity where contingency is applied.
- (10) Total Cost: Cone penetrometer holes and boreholes abandonment will be addressed during the corrective measures study.

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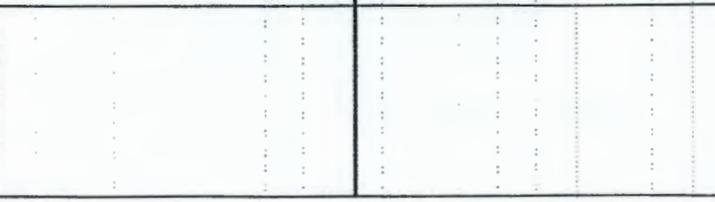
WORK/CLOSURE PLAN PREPARATION		
BPA00000	BHI/DOE CONCURRENT REVIEW OF REVISED WORK PLAN	38
BPA00000	DISPOSITION/INCORPORATION OF BHI/DOE COMMENTS	24
BPA00000	PREPARE WORK/CLOSURE PLAN DRAFT B.	147
BPA00000	TRANSMIT WORK/CLOSURE PLAN DRAFT B TO DOE-RL	1
BPA00001	DOE-RL DOCUMENT PROCESSING/TURN-AROUND	14
BPA00001	DOE-RL SUBMITS DRAFT B. TO REGULATORS FOR REVIEW	0
BPA00001	TPA COMMITMENT: MILESTONE M-20-36	0
BPA00001	60-DAY REGULATOR REVIEW OF DRAFT B.	60
BPA00001	RECEIVE REG. COMMENTS, DISPOSITION, PREP REV. 0	60
BPA00002	TRANSMITTAL OF REV. 0 TO DOE-RL	1
BPA00002	DOE-RL TO SUBMIT REV. 0 TO REGULATORS	7
BPA00002	30-DAY REGULATOR REVIEW OF REV. 0	30
BPA00002	REGULATORS PREPARE REV. 0 FOR PUBLIC REVIEW	67
BPA00002	PUBLIC REVIEW/COMMENT PERIOD	30
BPA00003	RESPONSE BY REGULATORS AND FINILIZE WORK PLAN	30
BPA00003	WORK PLAN APPROVAL	0



DOW PREPARATION		
BPA00009	PREPARE TEST PIT EXCAVATION DOW	60
BPA00010	REGULATOR REVIEW AND COMMENT OF DOW	15
BPA00010	INCORPORATE COMMENTS AND REVISE DOW	15
BPA00011	DOW APPROVED	0
BPA00011	PREPARE CPT/PIPELINE INTEGRITY DOW	60
BPA00012	REGULATOR REVIEW AND COMMENT OF DOW	15
BPA00012	INCORPORATE COMMENTS AND REVISE DOW	15
BPA00013	DOW APPROVED	0
BPA00030	PREPARE BOREHOLE DRILLING DOW	60
BPA00030	REGULATOR REVIEW AND COMMENT OF DOW	15
BPA00030	INCORPORATE COMMENTS AND REVISE DOW	15
BPA00030	DOW APPROVED	0



TASKS 2, 3, 4 AND 5		
BPA00013	NONINTRUSIVE ACTIVITIES (CPT/GPR/Geodetic Survey)	60
BPA00013	PIPELINE INTEGRITY ASSESSMENT	60
BPA00013	MOBILIZATION FOR BOREHOLE DRILLING	10



Project Start: 01DEC94 Early Bar
 Project Finish: 25SEP99 Progress Bar
 Data Date: 11JUL95 Critical Activity
 Plot Date: 22SEP95

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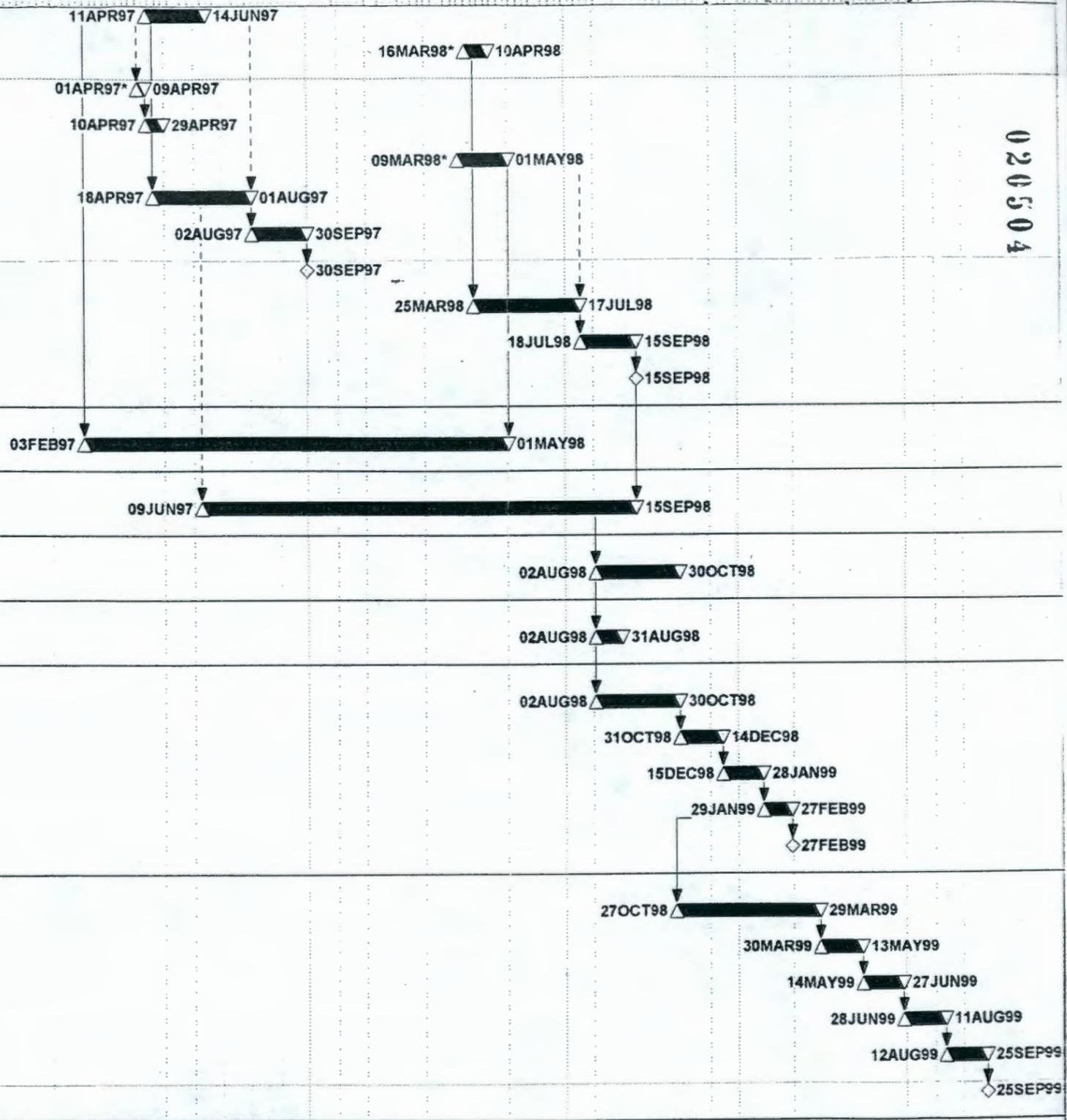
BECHTEL HANFORD, INC.
 200-BP-11 WORK/CLOSURE PLAN

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BPA00013	FY97 BOREHOLE (5) DRILLINGS/SAMPLING	65
BPA00013	FY98 BOREHOLE (3) DRILLING/SAMPLING	20
BPA00013	MOBILIZATION FOR TEST PIT EXCAVATION	7
BPA00014	FY97 TEST PIT EXCAVATIONS/SAMPLING (5)	20
BPA00014	FY98 TEST PIT (10) EXCAVATIONS/SAMPLING	40
BPA00015	LABORATORY ANALYSIS	106
BPA00016	DATA VALIDATION	60
BPA00016	SUBMIT VALIDATED DATA TO REGULATORS	0
BPA00016	LABORATORY ANALYSIS	115
BPA00016	DATA VALIDATION	60
BPA00016	SUBMIT VALIDATED DATA TO REGULATORS	0
TASK 6		
BPA00017	AIR SAMPLING	453
TASK 7		
BPA00017	DATA EVALUATION	464
TASK 8		
BPA00018	RISK-BASED CLEAN-UP STANDARD EVALUATION	90
TASK 9		
BPA00018	CORRECTIVE MEASURE REQUIREMENTS EVAL.	30
TASK 10 - FACILITY INVESTIGATION RPT. (V)		
BPA00019	PREPARE FACILITY INVESTIGATION REPORT	90
BPA00019	ERC REVIEW AND COMMENT	45
BPA00020	45-DAY DOE-RL REVIEW AND COMMENT DISPOSITION	45
BPA00020	INCORPORATION OF DOE-RL COMMENTS/DOC. REV.	30
BPA00021	FACILITY INVESTIGATION REPORT TO REGULATORS	0
CORRECTIVE MSRS. STUDY RPT. & PROP. P		
BPA00021	PERFORM CORRECTIVE MEASURES STUDY (CMS)	154
BPA00022	PREP CMS RPT./CORRECTIVE MEASURES PROPOSED PLAN	45
BPA00022	ERC REVIEW, DISPOSITION AND COMMENT INCORP.	45
BPA00023	45-DAY DOE-RL REVIEW AND COMMENT DISPOSITION	45
BPA00023	INCORPORATION OF DOE-RL COMMENTS/DOCUMENT REV.	45
BPA00024	CMS REPORT & PROPOSED PLAN TO THE REGULATORS	0



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