



Department of Energy
Richland Operations Office
P.O. Box 550
Richland, Washington 99352

0049111

057701



Mr. J. R. Wilkinson
Confederated Tribes of the
Umatilla Indian Reservation
P.O. Box 638
Pendleton, Oregon 97801

Dear Mr. Wilkinson:

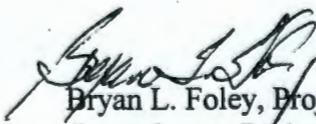
**REQUEST FOR MEETING REGARDING 200 AREA REMEDIAL INVESTIGATION/
FEASIBILITY STUDY (RI/FS) IMPLEMENTATION PLAN FOR THE ENVIRONMENTAL
RESTORATION PROJECT**

The U.S. Department of Energy, Richland Operations Office (RL), would like to request an opportunity to hold direct discussions with the Confederated Tribes of the Umatilla Indian Reservation regarding the development of a planning document draft titled the 200 Area RI/FS Implementation Plan for the Environmental Restoration Project. Once you have completed your review of this very early draft of the attached annotated outline for this document, I along with other members of the Tri-Party development team (including representatives from the U.S. Environmental Protection Agency, the State of Washington Department of Ecology, and RL's Environmental Restoration Contractor) would be happy to meet with you to discuss any issues and/or concerns you may have regarding the development of this plan.

This transmittal is in keeping with RL's commitment to continued sharing of key documentation affecting cleanup activities at the Hanford Site, as early as possible.

Please feel free to contact me at (509) 376-7087 if you have any questions. I will call your office in the next week or so to follow-up on this offer to conduct a consultation.

Sincerely,


Bryan L. Foley, Project Manager
Groundwater Project

GWP:BLF

Attachment

cc w/o attach:
J. W. Donnelly, Ecology
V. R. Dronen, BHI
R. Jim, YIN

G. B. Mitchem, BHI
T. C. Post, EPA
D. L. Powaukee, NPT
L. C. Treichel, EM-442

**200 AREA RI/FS IMPLEMENTATION PLAN
OUTLINE SUMMARY**

EXECUTIVE SUMMARY
TABLE OF CONTENTS
ACRONYM LIST

- 1.0 INTRODUCTION**
 - 1.1 OVERVIEW OF ASSESSMENT ACTIVITIES AT HANFORD
 - 1.2 PURPOSE AND SCOPE OF THE IMPLEMENTATION PLAN

- 2.0 APPROACH AND RATIONALE TO INTEGRATION OF RCRA AND CERCLA PROCESSES**
 - 2.1 CERCLA PROCESS DESCRIPTION
 - 2.2 RCRA PROCESS DESCRIPTION
 - 2.3 INTEGRATION OF RCRA AND CERCLA

- 3.0 IMPLEMENTATION OF CHARACTERIZATION**

- 4.0 200 AREA SETTING AND BACKGROUND**
 - 4.1 PHYSICAL SETTING OF THE 200 AREA
 - 4.2 OPERATIONAL HISTORY
 - 4.3 CONTAMINANTS/SOIL INTERACTIONS

- 5.0 CONCEPTUAL EXPOSURE PATHWAY AND RISK ASSESSMENT**

- 6.0 POTENTIAL APPLICABLE OR RELEVANT AND APPROPRIATE REQUIREMENTS**

- 7.0 DQO PROCESS AND CHARACTERIZATION REQUIREMENTS**
 - 7.1 DQO PROCESS
 - 7.2 CHARACTERIZATION REQUIREMENTS

- 8.0 PROJECT MANAGEMENT AND PROGRAMMATIC INTEGRATION**
 - 8.1 WORK BREAKDOWN STRUCTURE
 - 8.2 PROJECT MANAGEMENT
 - 8.3 INTERFACE WITH OTHER PROGRAMS AND AGENCIES
 - 8.4 SCHEDULE

- 9.0 REFERENCES**

APPENDICES

- A - Quality Assurance Project Plan
- B - Health and Safety Plan
- C - Information Management Overview/Data Management Plan
- D - Preliminary Remedial Action Objectives, General Response Actions, Remedial Action Alternatives, Technologies Assessment/ Treatability testing needs
- E - Waste Management/Control Plan

200 AREA RI/FS IMPLEMENTATION PLAN
ANNOTATED OUTLINE

2/23/98 Outline7.doc

EXECUTIVE SUMMARY

TABLE OF CONTENTS

ACRONYM LIST

1.0 INTRODUCTION

1.1 OVERVIEW OF ASSESSMENT ACTIVITIES AT HANFORD

Overview of observational approach, analogous sites concept, aggregate area approach, Technical Baseline Reports, and AAMS reports; introduce the waste site groupings document; introduce 23 group specific work plans vs. geographically based groups.

1.2 PURPOSE AND SCOPE OF THE IMPLEMENTATION PLAN

A description of the purpose of the Implementation Plan, including a description of the layout of the remainder of the document. Discuss concept of work plan materials to be presented here followed by group specific work plans. Include a discussion of enforceable schedules and the purpose and content of future Group Specific Work Plans. (*Note: This last item could be discussed in Section 2.3 or 3.0 instead.)

2.0 APPROACH AND RATIONALE TO INTEGRATION OF RCRA AND CERCLA PROCESSES

Include either here or in Section 1.1 a discussion explaining the approach and rationale going from operable unit to groups.

2.1 CERCLA PROCESS DESCRIPTION

Discuss the CERCLA process that results in a decision document, then on to remediation, and closeout. Include a discussion of the overall regulatory approach, including a reference to potential ARARs. Include a typical schedule showing milestones and document types, and describe both schedules used by CERCLA (one in work plan and one later in RDR/RAWP). Describe the public involvement process.

2.2 RCRA PROCESS DESCRIPTION

Discuss RCRA TSD and RCRA Past-Practice (RPP) processes including the Hanford Facility RCRA Permit, the RCRA permitting process and closure plan regulatory requirements, a discussion of remediation, closure performance standards, schedule, and enforceable conditions. This will also include closure options and post closure permitting and a discussion of MTCA regulations as applicable to cleanup standards (emphasizing MTCA limits are not arbitrary but are risk based values). Include a typical schedule showing milestones and document types. Describe the public involvement process.

2.3 INTEGRATION OF RCRA AND CERCLA

Describe the benefits of an integrated approach, then describe how RCRA and CERCLA documentation requirements and activities will be integrated. Mention that only 6 of the 23 waste groups include TSD units. Identify in which documents and steps of the integrated process the RCRA and CERCLA requirements will be met. Identify the RCRA TSD requirements that will be complete in the Work Plan (i.e., TSD unit Description, Waste Characteristics and Inventory, Waste Generating Processes, Groundwater evaluation, and Sampling and Analysis Plan for Characterization). Specifically identify that, if a waste group includes TSD units, those TSD units will be characterized along with other representative sites for each waste grouping. Include a discussion of specific documents and deliverables. Include an integrated schedule and describe the public involvement process for the integrated approach.

(*Note: Implementing corrective action is still being developed and will be incorporated into the Hanford Facility RCRA Permit. It is the intent of the Tri-parties to implement the most efficient cleanup process. RCRA past practice sites in the 200 Area will utilize the CERCLA process to allow disposal to ERDF; no re-designation is required within Appendix C of the Tri-Party Agreement. While this is the preferred pathway, other options do exist and can be implemented by the Washington State Department of Ecology to address RPP sites. Further discussion in group-specific work plans may be needed to describe the ongoing corrective action process being developed.)

3.0 IMPLEMENTATION OF CHARACTERIZATION (*Note: This could be placed in Section 2.0 as 2.4 or moved to Section 7.2)

Refer to Section 2.0 as the "big picture" and then address here how characterization will be addressed utilizing the analogous site approach. Include how RCRA/CERCLA integration drives site characterization activities to be performed prior to remedy selection, and how both RCRA & CERCLA processes include confirmation of remedy selection, and verification sampling later in the process, as appropriate. (This latter verification sampling is however not truly characterization sampling but rather a confirmation of attaining cleanup standards or closure performance standards.) Include a discussion of what the group specific work plans will include from a characterization perspective.

4.0 200 AREA SETTING AND BACKGROUND

Describe how existing information (AAMS, Technical Baseline Reports, Site Wide Environmental Monitoring, etc) is available and how it can be used to aid in characterization and remedial alternative selection. Not only discuss existing information that can be found in the AAMS reports but also include the broad data gaps that were identified, as well as the broad knowledge of what we do know. Note that these data gaps will be discussed further in the group specific work plans.

4.1 PHYSICAL SETTING OF THE 200 AREA

Discuss the 200 Area, 200 East, 200 West, 200 Other and include topics such as Topography, Meteorology, Surface Water Hydrology, Human Resources, and Environmental Resources. Discuss the aspects that are common to all of the 200 Area in this section, including soil characteristics and vadose zone hydrogeology, then discuss the aspects that are specific to a particular area (East, West, Other,

etc.). Include a discussion of groundwater (e.g., contamination plumes, pump and treat performance and impacts).

4.2 OPERATIONAL HISTORY

Discuss in terms of 200 East, 200 West, 200 Other. Describe the major processes/plants, and waste chemistry from the process/plant level of detail, bringing in what type of waste sites (ponds, ditches, cribs, etc.) were used and in what context. Include a discussion of the contaminants based on available data, thereby introducing the Contaminants of Potential Concern. It would include maps of the 200 Area color coded to show the different waste site groups. (*Note: This might be the place to introduce the distinctions between Environmental Restoration, Waste Management, and Tank Farms programs.) Introduce the existing programs and provide an overview to give them a higher level of visibility here, and point to section 8.0 for more detail.

4.3 CONTAMINANTS/SOIL INTERACTIONS

Describe the interactions between the process waste (e.g., chemistry, and volumes discharged) and the soil (e.g., physical and geochemistry) in general terms at the ponds, ditches, cribs, burial grounds, tanks, etc. levels and introduce a general contaminant distribution model. Bring in Waste Site Groupings report here (rationale for how waste site groups were derived, a brief description of each waste group, and the list of waste sites in each of the groups. Reference the physical contaminant distribution models that were developed for each waste group in the Groupings report and state that refinement of these will occur in the group specific work plans.

5.0 CONCEPTUAL EXPOSURE PATHWAY AND RISK ASSESSMENT

This would be a discussion of a general exposure pathway model applicable to the 200 Area, associated risk assessment concepts and requirements, and how it fits into the integrated RCRA/CERCLA process. (Note: Specific detailed discussions, as needed, would be referred to each subsequent group specific work plan. Discuss how these conceptual ideas are part of the purpose of the characterization activities, to confirm or revise the physical conceptual model or characterization needs. This is the place to introduce the types of contaminant transport models that have been successfully applied in the past (e.g., Resrad, Porflow, etc.) in a general discussion (e.g., lessons learned) that indicates that the group specific work plans will determine what will be used for each group. Reiterate the differences between generalized conceptual exposure pathway models and a physical contaminant distribution model.

6.0 POTENTIAL APPLICABLE OR RELEVANT AND APPROPRIATE REQUIREMENTS

This section identifies federal and state standards, requirements, criteria, or limitations that may be considered relevant to the 200 Area. A tabulated listing of all potential ARARs will be provided. Included in the discussion will be statements that indicate that refinement of the ARARs will be performed at the group specific level.

7.0 DQO PROCESS AND CHARACTERIZATION REQUIREMENTS

(*Note: Don't forget to include RCRA terminology, not just CERCLA terms.)

7.1 DQO PROCESS

Describe the principles, process, and how DQO's will be utilized in one subsection. A second subsection will address generic information that is applicable to all waste groups [developed from the Gable Mtn/B Pond DQO (if completed in time)]. An example of this information would be how data quality would be addressed (reference back to Appendix A).

7.2 CHARACTERIZATION REQUIREMENTS (*Note: to be coordinated with 2.4/3.0)

Initial characterization: Discuss the rationale for characterization needs, in that the characterization of the representative sites will be applied for the entire group. Discuss concepts of boreholes, test pits, surface sampling, cone penetrometer borings, etc. Describe the effort that went into picking representative sites to be used for each group, and the general approach to characterization of the sites for each grouping. (Note: Finalization of the representative sites for each group will occur during development of the group specific work plans.) Emphasize the analogous sites approach and the idea that TSDs are being characterized prior to remedy selection to facilitate closure decisions. Discuss how characterization is influenced by potential ARARs and Remedial Action Objectives, Remedial Alternatives, etc. and how site specific information will be found in group specific work plans.

Characterization to confirm remedy selection: Describe the sampling that will be performed to confirm that analogous conditions exist and that the remedial alternative decision is appropriate for each of the waste sites in a particular group. Describe the course of action that will occur if analytical results indicate that a waste site should be placed in another waste group. Include flexibility to perform this step either pre- or post-ROD to take advantage of timing and funding situations; i.e., describe the timing of when this step occurs. Note that since TSDs will be characterized prior to remedy selection this section does not apply to TSDs. Also note that a SAP will be generated before any sampling is performed.

Verification sampling (Note: It may be appropriate to place this into a separate section such as 7.3): Describe the process of sampling to verify that remedial actions and/or verification of closure have been completed (i.e., performance standards have been met). This is not a characterization activity but is performed to verify completion.

8.0 PROJECT MANAGEMENT AND PROGRAMMATIC INTEGRATION

8.1 WORK BREAKDOWN STRUCTURE (used to manage the project)

8.2 PROJECT MANAGEMENT

(Note: Both 8.1 and 8.2 may become appendices.)

8.3 INTERFACE WITH OTHER PROGRAMS AND AGENCIES

(How are EPA/Ecology/DOE going to work together to develop the 200 Area IP, etc.)

TWRS Activities

On Going Cleanup Activities

Vadose Zone Integration Plan, etc.

Other agencies include the HAB, DOH, Tribes, IAMIT, Stakeholders, etc.

Include discussion on public participation.

8.4 SCHEDULE

This schedule will be the master integrated schedule and the text will include a discussion of the enforceable milestones, closure plan, proposed plan, Remedial Design Report/Remedial Action Work Plan, etc. Note that the group specific work plans will contain the enforceable milestones or TSD “enforceable schedule” applicable to each group, and describe what is contained within this master schedule versus the group specific work plan schedules. Describe the public involvement process.

9.0 REFERENCES

APPENDICES

- A - Quality Assurance Project Plan
- B - Health and Safety Plan
- C - Information Management Overview/Data Management Plan
- D - Preliminary Remedial Action Objectives, General Response Actions, Remedial Action Alternatives, Technologies Assessment/ Treatability testing needs
- E - Waste Management/Control Plan – How to manage waste during investigations (IDW); refer back to Section 3.0 or 7.0 for introduction to this topic or possibly in Section 8.1. Include a discussion of AOC.