



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10 HANFORD/INL PROJECT OFFICE
309 Bradley Boulevard, Suite 115
Richland, Washington 99352

September 11, 2008

Mr. Al Farabee
Federal Project Director
U.S. Department of Energy
PO Box 550, A5-11
Richland, WA 99352

Re: EPA Comments on the Revised U Plant Ancillary Facilities Removal Action Work Plan

Dear Mr. Farabee:

The U.S. Environmental Protection Agency has reviewed the *U Plant Ancillary Facilities Removal Action Work Plan, Phase II* (DOE/RL-2004-83, Draft A, Revision 1). We have enclosed our comments on the work plan.

To address some of our comments, it would be beneficial if the Tri-Party Agency project managers for the U Plant area meet to facilitate resolution of any potential issues. After you have reviewed our comments, please contact me at 509 376-8665 to arrange a meeting.

Sincerely,

A handwritten signature in cursive script that reads "Craig Cameron".

Craig Cameron
Project Manager

Enclosure

cc: Margo Voogd, DOE
Wade Woolery, DOE
Rick Bond, Ecology
John Price, Ecology
✓ Administrative Record: 200-UW-1

RECEIVED
SEP 15 2008
EDMC

U.S. Environmental Protection Agency Comments on *U Plant Ancillary Facilities Removal Action Work Plan, Phase II, DOE/RL-2004-83, Draft A, Revision 1* Submitted as Part of the 221-U Facility IAMIT Dispute Resolution Agreement

Craig Cameron

September 11, 2008

General

1. The draft document is over all in really good shape and is consistent with the earlier version. The document was generally modified adequately to focus on the second phase and does a good job of explaining why the one building (2712-U Instrument Building) still has a purpose and so will be part of a third phase. A little more bounding information about schedule and cost for the third phase would be helpful so that it isn't totally open-ended. DOE must have baseline information for this little building that could at least bound the scope of the removal action. That information needs to be included in this work plan.
2. Cost estimate information, with extra detail on the second phase, must be included in the work plan. This could be done with an appendix. It is not adequate to just describe the cost tracking process.
3. The language about the schedule and funding is too weak. The Tri-Parties need to get together and come up with some language for these types of projects where there isn't an urgent need to perform them now but a certain amount of work needs to continue to be able to conclude the cleanup activities to meet the overall schedule for the 200 Area.

Keep in mind that the start dates are part of an IAMIT dispute resolution agreement and should not be referred to in the work plan in such noncommittal terms. EPA suggests that the project managers meet to try to come up with language that would satisfy all for the schedule in the work plan. We should be able to arrive at language consistent with the dispute resolution agreement that took into account the uncertainties about the upcoming contract dates that could be sooner. Finally, it is not clear where the 9/30/2012 completion date in the dispute resolution agreement fits into the schedule provided in the work plan.

Specific

1. *Page 4, Section 1.4.* Since there is not a larger scale map showing the Hanford site, please describe in the text about how many miles away the Columbia River is from the U Plant area.
2. *Page 8, Section 1.4.2, 2712-U Instrument Building.* Add a sentence to the end of the section describing the building to indicate that this building is part of phase III and will be decontaminated and demolished (D&Ded) under this removal action unless the Tri-

Parties agree to perform the work under other CERCLA authority after the proper transfer or inclusion of the building under another CERCLA decision document.

3. *Page 9, Section 1.4.3, Radiological Material Inventory.* Please provide a copy or link to WHC-SD-WM-TPP-052 to the EPA project manager.
4. *Page 11, Section 1.4.4, PCBs.* Write the titles of the CFR citations to be consistent with the other citations and for readability.
5. *Page 11, Section 2.1, last sentence.* Please change "may be" to "are."
6. *Page 12, Section 2.1.2.* Provide a couple examples S&M frequencies and activities that are driven by ARARs.
7. *Page 12 and 13, Section 2.2.2.* There needs to be a description somewhere in here about the possible characterization of pipe openings that lead below grade and slab surveys. This is required according to the SAP and needs to have a description in the work plan.
8. *Page 14, Section 2.2.3, last paragraph.* There should be more information on the verification sampling in the schedule and budget. Also, the verification sampling needs its own heading to call it out.
9. *Page 32, Section 5.2.* Text needs to be added to explain when changes are significant enough for EPA and DOE become involved in the change management/configuration control process and how that involvement would work. There may be such language in the SAP to draw from.