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93-ERB-202

JUL 26 1993

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



93130262149

Dear Messrs. Hofer and Stanley:

SUBMITTAL OF THE LIMITED FIELD INVESTIGATION (LFI) REPORT FOR THE 100-BC-1 OPERABLE UNIT (OU), DRAFT A (DOE/RL-93-06) AND THE QUALITATIVE RISK ASSESSMENT (QRA) FOR THE 100-BC-1 SOURCE OPERABLE UNIT (WHC-SD-EN-RA-003, REV. 0) *29536 26951*

Enclosed please find the subject LFI Report (enclosure 1) and QRA (enclosure 2) submitted by the U.S. Department of Energy, Richland Operations Office (RL), to the U.S. Environmental Protection Agency (EPA) and the State of Washington Department of Ecology (Ecology) for review. Submittal of the 100-BC-1 OU LFI Report completes Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) Interim Milestone M-15-08B which requires RL to submit the 100-BC-1 OU LFI report to EPA and Ecology by July 31, 1993. The 100-BC-1 OU QRA is provided to facilitate review of the LFI Report. As the LFI Report is roughly analogous to a Phase I Remedial Investigation Report (RI), defined in Table 9-2 of the Tri-Party Agreement Action Plan as a secondary document, RL requests EPA comments (as the regulatory agency for 100-BC-1) by September 15, 1992.

RL, EPA, and Ecology agreed to the unique concepts of LFIs and QRAs when adopting the Hanford Site Past-Practice Strategy (HSPPS) for use in September 1991 to create a basis for action. An LFI is an effort to collect limited additional site data which are sufficient to support a decision on conducting expedited response actions or interim remedial measures (IRMs). A QRA is a characterization of risk to human health and the environment associated with waste site contamination not based solely on quantification using existing and available site data. Preparation of an OU specific QRA is a task incorporated in the corresponding OU specific LFI Report. Since September 1991, RL, EPA, and Ecology have worked together on a daily basis to implement HSPPS and conduct LFIs at Hanford.

The purpose of the 100-BC-1 OU LFI report is for RL to recommend whether 26 100-BC-1 OU high priority past-practice waste sites, as identified and agreed by RL, EPA, and Ecology, continue to be candidates for an IRM since completion of the 100-BC-1 OU LFI. This LFI report, the first of its kind, is a

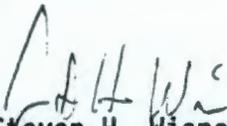
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compilation and analysis of data relevant to the high-priority waste sites in the 100-BC-1 OU as identified in the 100-BC-1 OU RI/Feasibility Study (FS) Work Plan (approved by EPA on July 22, 1992). With this data, and a summary of the associated 100-BC-1 OU QRA, the report provides a basis for making a defensible recommendation for maintaining IRM candidacy on a waste site by waste site basis.

The 19 waste sites in the 100-BC-1 OU recommended by RL for continued IRM candidacy will be included in a focused FS for detailed analysis of remedial alternatives scheduled for submittal by RL to EPA and Ecology by November 1994. Action at five waste sites not recommended for continued IRM candidacy will be deferred to a final remedy selection phase scheduled for completion by September 2018. More information is required to make a recommendation for two remaining sites, therefore RL suggests an additional LFI be conducted at each site.

Please address any comments or questions regarding this correspondence or Hanford Site 100 Area past-practice environmental investigations to Mr. Eric Goller on (509) 376-7326.

Sincerely,


Steven H. Wisness
Hanford Project Manager

ERD:EDG

Enclosures: As stated

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Subject: SUBMITTAL OF THE LIMITED FIELD INVESTIGATION (LFI) REPORT FOR THE 100-BC-1 OPERABLE UNIT (OU), DRAFT A (DOE/RL-93-06) AND THE QUALITATIVE RISK ASSESSMENT (QRA) FOR THE 100-BC-1 SOURCE OPERABLE UNIT (WHC-SD-EN-RA-003, REV. 0) *26951* *29536*

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Enclosure is the same as the enclosure to 9355995D and 9356217D.