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STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

1315 W. 4th Avenue • Kennewick, Washington 99336-6018 • (509) 735-7581

August 29, 2003

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EDMC

Mr. Bryan Foley  
Richland Operations Office  
United States Department of Energy  
P.O. Box 550; MSIN: A6-38  
Richland, Washington 99352

Dear Mr. Foley:

Re: Tanks/Lines/Pits/Boxes/Septic Tank and Drain Field Waste Group Operable Units  
Remedial Investigation/Feasibility Study Work Plan and RCRA TSD Unit Sampling  
Plan, DOE/RL-2002-14, Revision 0

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The United States Department of Energy's (USDOE) letter 03-RCA-0225 transmitted the subject Remedial Investigation/Feasibility Study (RI/FS) Work Plan. The work plan is incomplete because the following tables do not adequately "identify likely response scenarios and potentially applicable technologies and operable units that may address site problems" as required by 40 CFR 300.430(b)(3):

- Table D-2 of the *200 Areas Remedial Investigation/Feasibility Study Implementation Plan – Environmental Restoration Program (DOE/RL-98-28) (Implementation Plan)* includes some screening of process options for contaminated soils and solid contaminated media.
- Table D-4 of the *Implementation Plan* includes some preliminary remedial action alternatives applicable to the 200-IS-1 and 200-ST-1 Operable Units.

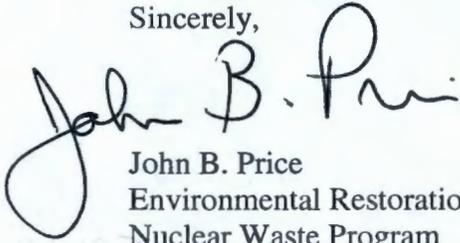
The RI/FS Work Plan (DOE/RL-2002-14) refers to the *Implementation Plan* for the required scoping information. The *Implementation Plan* does not contain enough detail about in-situ grouting or stabilization technologies. The RI/FS Work Plan should be revised to add an evaluation of grouting technologies as both a final remediation and as an interim step in characterization and remediation (e.g., by characterizing the grouted structure). Also, please revise the RI/FS Work Plan to add an evaluation of demolition as an interim step in characterization and remediation (e.g., by characterizing the demolished structure).

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Please refer to USDOE letter 02-WMD-044, "Stabilization Options for the Hexone Tanks." The USDOE identified cost savings related to "the cost of an enclosure [for radiological controls] over multiple facilities." Please amend the RI/FS Work Plan to include processing of multiple tanks as a likely response scenario. The work plan should identify the data quality objectives for sampling necessary to evaluate this response scenario in the feasibility study.

Ecology is again identifying the deficiency in ecological characterization data supporting this RI/FS. Protection of the environment should be included in the evaluation of likely response scenarios. Please identify any and all ecological characterization needed to support the feasibility study. The ecological characterization needs should be based on specifically identified options for the soil point of compliance.

Sincerely,



John B. Price  
Environmental Restoration Project Manager  
Nuclear Waste Program

lkd

cc: Craig Cameron, EPA  
Bruce Ford, FH  
Todd Martin, HAB  
Rick Gay, CTUIR  
Pat Sobotta, NPT  
Russell Jim, YN  
Ken Niles, OOE  
Bob Wilson, Ecology  
**Administrative Record:** 200-IS-1, 200-ST-1, 76-S-141/142 (Hexone) Tanks