



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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June 30, 1999

Mr. Glenn Goldberg  
U.S. Department of Energy  
P.O. Box 550, MSIN: HO-12  
Richland, Washington 99352



Dear Mr. Goldberg:

Re: Comments on the *100 Area Burial Ground Focused Feasibility Study* (FFS), Draft B

51204

Enclosed for your review and resolution are the Washington State Department of Ecology's (Ecology) and U.S. Environmental Protection Agency's (EPA) comments on the above subject document. The document requires significant modification prior to preparation of the Proposed Plan.

For convenience, the comments are presented in three (3) areas: general, specific, and administrative. We are asking for written responses to our general and specific comments only. The administrative comments are provided for information to improve the document.

If you have any questions, please contact Jack Donnelly at (509) 736-3013 or Dennis Faulk at (509) 376-8631.

Sincerely,

Jack Donnelly, Cleanup Project Manager  
Nuclear Waste Program

Dennis Faulk  
EPA Project Manager

FB:JD:DF:sb  
Enclosure

cc: Rick Donahoe, BHI  
J.R. Wilkinson, CTUIR  
Pat Sobotta, NPT  
Russell Jim, YIN  
Administrative Record: 100 BC-1, BC-2, 100-HR-2, 100-DR-2, 100-FR-2, and 100 KR-2

**Official EPA/Ecology Comments on DOE/RL-98-18 Draft B  
100 Area Burial Ground Focused Feasibility Study**

**General Comments**

1. EPA and Ecology disagree with the U.S. Department of Energy's (USDOE's) preferred alternative. EPA and Ecology have no interest in writing a phased Record of Decision (ROD). The regulatory agencies believe that remove, treat, and dispose (RTD) is the appropriate alternative for the 100 Area burial grounds. In addition, EPA and Ecology recommend that instead of remediating all the small sites first, a strategy of combining a mix of small sites and large sites is more appropriate and will help levelize material to Environmental Disposal Restoration Facility (ERDF).
2. EPA and Ecology have a fundamental concern that the containment alternative is inconsistent with the 100 Area interim action ROD (September 1995) for liquid waste disposal which selected the RTD alternative and allowed for the unrestricted use of *all* land surface areas. Leaving contaminants in the ground, particularly unknown contaminants, and restricting the land use through institutional controls is not prudent for lands so close to the Columbia River.
3. There is no regulatory citation in the Model Toxics Control Act (MTCA) for a "Restricted Rural Residential" or "Recreational" use. Under the current regulations, Ecology uses Method B cleanup values for residential use.
4. The RTD alternative is clearly the preferred cleanup action based on the requirements of MTCA as specified under Washington Administrative Code (WAC) 173-340-360, Selection of Cleanup Actions. WAC 173-340-360(3)(a) states that "permanent solutions to a cleanup action should be used to the maximum extent practicable." WAC 173-340-360(5)(c) states that "containment of hazardous substances and/or institutional controls alone are not permanent solutions."  
  
WAC 173-340-360(4)(a) states that "cleanup of hazardous wastes sites shall be conducted using technologies which minimize the amount of untreated hazardous substances remaining at a site." With regard to selecting technologies for remediation, this same section of MTCA gives a higher priority to on-site or off-site disposal at an engineered facility than to isolation or containment with engineering controls. WAC 173-340-360(5)(e)(iv) states that "a cleanup action relying primarily on institutional controls and monitoring shall not be used where it is technically possible to implement a cleanup action alternative that utilizes a higher preference cleanup technology for all or a portion of the site."
5. Throughout the FFS you discuss the Applicable or Relevant and Appropriate Requirements (ARAR) of 15 mrem/yr above background but fail to mention that the EPA guidance (EPA, 1997) states that this level should be in effect for 1000 years following remediation (as you did state in Appendix C, page C1-2).
6. With regard to the time frame of effectiveness as discussed above, EPA and Ecology also is concerned about the long-term effectiveness and permanence of the containment alternative. Is 100 years really long enough for the radioactive wastes to decay to acceptable levels or will a

significantly longer period (up to 1000 years) possibly be needed? If a time frame longer than 100 years is chosen, cost tables will need to be changed to reflect this.

7. The FFS seems to reiterate throughout the entire document land use discussions contained in the *Hanford Remedial Action Environmental Impact Statement and Comprehensive Land-Use Plan* (HRA-EIS). It would be useful to have the land use discussion in one area versus repeat it throughout the entire document.
8. USDOE's preferred alternative for the 118-F-2 burial ground is capping even though the wastes in this burial ground could come in contact with aquifer during high water conditions. This makes no sense, how can capping 118-F-2 be protective of the environment?
9. The first half of the document makes many absolute statements regarding contaminants of concern, leachability, and stability of burial grounds. Other areas of the document speak to the uncertainty of burial ground contents. EPA and Ecology agree with the latter statement and suggest the document be revised to highlight the uncertainty of burial ground contents.
10. EPA and Ecology questions the large discrepancy in the costs of the two alternatives. There is not enough cost detail provided in the FFS to know if the cost estimates and assumptions are valid. For example, the cost and source of capping and backfill material is unknown (all lumped together under Site Restoration), the cost to monitor contained sites may be significantly more if the time frame for containment is possibly 1000 years instead of 100 years, and costs details for Barrier #1 (Section 4.0 and page 4.8) should be included.

With regard to costs, the burial grounds cannot be capped without first having better knowledge of what you are capping, and characterization of the burial grounds will add significant cost to the containment alternative.

11. The costs presented in Table E-1 of Appendix E do not match the costs presented in Table 8-1 of Section 8.0. This discrepancy makes it difficult to review the document and accurately compare costs.
12. It cannot be stated with confidence at this time that the containment alternative is "protective and ARAR-compliant" because very little is known about what is contained in the burial grounds. Also, it is not known with certainty that the contaminants in the burial grounds are immobile as stated in the report. For example, it is true that there is no driving force for moving waste out of the burial grounds if in fact they contain only solid wastes. However, if liquid wastes are contained in some of the burial grounds, the potential for migration does exist. Also, it is not known whether high level radioactive wastes were disposed in some of these burial grounds.
13. The Risk Assessment Methodology presented in Appendix C seems incorrect in that the Rural Residential alternative should have the lowest risk because under this alternative the contamination has been removed. The risk of the Restricted Rural Residential alternative should be next because the contamination is left in place but is capped. The greatest risk would be associated with the No Action alternative.

### Specific Comments

1. Page ES-4, 1<sup>st</sup> sentence at top of page: The containment alternative does not meet the remedial action objective of “unrestricted rural residential use for all surface areas” (see page ES-2, last paragraph) and is not compliant with ARARs. The text should be modified to reflect this.
2. Page ES-1, 3<sup>rd</sup> paragraph: MTCA should be included with the list of regulations.
3. Page ES-4, 2<sup>nd</sup> sentence from top of page: It is difficult to understand why the RTD alternative only performed “slightly” better than the containment alternative for long-term effectiveness and permanence. It would appear that RTD is better than leaving in place and capping with respect to long-term effectiveness and permanence. Please clarify.
4. Page ES-4, Top paragraph, 2<sup>nd</sup> to last sentence: In the long term, it seems that NEPA values (i.e., impacts to natural, cultural, and historical resources; socioeconomic impacts; cumulative impacts; and irreversible and irretrievable commitments of resources – FFS, page 1-2) would be fulfilled better under the RTD alternative rather than the containment alternative. Please explain.
5. Page ES-4, Top paragraph, last sentence: This sentence is misleading by stating that containment is less costly than RTD for both small and large burial grounds and that containment is significantly less costly than RTD for large burial grounds. In fact, the findings of the report (see Table 7-1) show that RTD is less costly than containment for the 21 smallest burial grounds and the costs are relatively close for the next 8 largest burial grounds. The text should be modified to reflect this.
6. Page ES-4, Last paragraph: This paragraph states that “to address regulatory agency concerns regarding burial grounds contents, USDOE-RL recommends that the burial ground remediation process be phased.” What regulatory agency concerns does this refer to? EPA and Ecology are unaware of specific concerns. In addition, EPA and Ecology believe the RTD alternative is the most appropriate alternative for burial grounds in the 100 Areas. The text should be revised to reflect this.
7. Page 2-5, 2<sup>nd</sup> paragraph: This paragraph states that the only reason the rural residential scenario was retained in the FFS was because the USDOE land use plan “is not yet final.” Several points should be clarified regarding land use plans. First, land use plans are subject to change over time, and second, cleanup levels do not automatically change if a land use plan is adopted.
8. Page 2-5, 3<sup>rd</sup> bullet: This bullet should be expanded to discuss tribal uses.
9. Page 2-7, last bullet: This document had no regulatory review and is not a USDOE document. Please clarify.
10. Page 2-11, Section 2.3.2: Include the North Slope burial grounds information in this section.
11. Page 2-17, 2<sup>nd</sup> paragraph, last sentence: This statement assumes no irrigation of the 100 Area will occur based on the HRA-EIS. EPA and Ecology do not agree with this statement and remind USDOE that prior to the establishment of the Hanford Project the land use in the 100 Area was

irrigated agriculture, and also that land use plans are subject to change. We recommend revising the paragraph to reflect this.

12. Page 2-18, 2<sup>nd</sup> paragraph: This paragraph makes an absolute statement that the burial ground contents are stable and have low solubilities but provides no data to support this claim. Recommend changing the sentence to state that contents are assumed to be stable.
13. Page 2-18, 1<sup>st</sup> paragraph following the bullets: This paragraph should be revised to discuss the effects of irrigation on burial ground contents.
14. Page 2-18, last paragraph: Item 3 in this paragraph should be revised to reflect that under current conditions the burial grounds pose a low threat of leachability.
15. Page 3-2, 2<sup>nd</sup> paragraph: Cleanup standards are defined by ARARs. Please modify.
16. Page 3-2, last paragraph: This paragraph discusses future land use but fails to mention tribal uses. Revise paragraph accordingly.
17. Page 3-3, 2<sup>nd</sup> and 3<sup>rd</sup> paragraphs: The Restricted Land Use alternative is not consistent with the land use being applied to the liquid effluent waste sites located in the 100 Area and will not be acceptable for the 100 Area burial grounds. A final land use for the 100 Area has not been established, and as such, MTCA Method B and 15 mrem/yr will apply. Please explain your justification for the selection of a restricted land use scenario.
18. Page 3-3, 3<sup>rd</sup> paragraph, last sentence: This sentence is confusing. What point is the sentence trying to convey? Please clarify.
19. Page 3-4, 1<sup>st</sup> paragraph, 1<sup>st</sup> sentence: Isn't the unrestricted land use also compatible? Please clarify.
20. Page 3-4, 3<sup>rd</sup> paragraph: This paragraph indicates that seven days per year is based on EPA guidance. EPA and Ecology are not aware of this guidance. Is the text referring to HSRAM? If it is, the text should be changed to reflect that HSRAM is a Tri-Party Document. The last sentence regarding allowable time in a campsite is incorrect. In Washington, most campsites allow up to 14 days. Also, this paragraph makes no provision for multiple visits.
21. Page 3-4, last paragraph: Which MTCA method, A, B, or C, was used to establish cleanup standards for a recreational use scenario? Please clarify.
22. Page 3-5, Section 3.3.1.2: This paragraph talks about exposure to burial ground waste under a rural residential exposure scenario. It is not clear if this paragraph is trying to portray risk if a residence was built in burial ground waste. Under the RTD alternative, the waste would be removed, and therefore, no residence would be built in waste material. Please clarify.
23. Page 3-5, Section 3.3.1.4: This paragraph discusses institutional controls. The second sentence indicates that institutional controls are conservatively assumed by NRC to be lost in 100 years. Did NRC use the word conservatively? If not, delete the word. It appears that Table B-1 has a different value than 500 mrem/yr for exposure to an inadvertent intruder. Please clarify. Also, it

appears that the last sentence does not take into account the 118-B-1 hot spot. Text should be revised to reflect this data.

24. Page 3-6, 3<sup>rd</sup> paragraph: This paragraph concludes that migration of contamination from burial grounds to the Columbia River is unlikely. Was irrigation considered? If not, it should be and the text modified accordingly.
25. Page 3-7, last paragraph: The last sentence states that ARARs will be negotiated between the parties. ARARs are not negotiable and will be finalized in the ROD. The text should be modified accordingly.
26. Page 3-9, 1<sup>st</sup> paragraph following the bullet at top of page: The statement "it is unlikely that burial ground contamination would leach significantly and/or migrate to groundwater or the river" is too vague and uncertain. It does not provide any confidence that contaminants will not leach out of some burial grounds, especially when our knowledge of the burial grounds is limited. Please modify.
27. Page 3-9, Section 3.6, bullets under For Direct Exposure: How do we know if these standards are being met if the sites have not been characterized? The EPA guidance is 15 mrem/yr above background for 1000 years following remediation (EPA 1997) as stated in Appendix C, page C1-2. For the second bullet, MTCA does not recognize recreational and restricted residential scenarios. Please clarify.
28. Page 3-10, 4<sup>th</sup> paragraph: This paragraph makes a statement that Preliminary Remediation Goals (PRGs) that are protective of human health are also protective of ecological receptors. This may not be true in all cases such as with strontium-90. Also, Cr<sup>+6</sup> cleanup levels will be set to be protective of aquatic life. The text on page 3-11 (Ecological Exposure) should be modified to reflect this.
29. Page 3-13, 2<sup>nd</sup> paragraph: Delete the first sentence.
30. Page 4-2, Section 4.2, 2<sup>nd</sup> paragraph: This paragraph discusses natural attenuation. The paragraph discusses radionuclides but totally ignores other hazardous constituents. Text should be added to discuss the affects of natural attenuation on other hazardous constituents.
31. Page 4-3, 1<sup>st</sup> paragraph: What is the purpose of discussing hot spot removal? How would this achieve RAOs? Please clarify.
32. Page 4-3, 2<sup>nd</sup> and 3<sup>rd</sup> bullets under the 2<sup>nd</sup> paragraph: These bullets make no mention that both safety procedures and the documents for commitment of lands for ERDF are already in place. The text should be modified to reflect this.
33. Page 4-5, 1<sup>st</sup> paragraph: The third to last sentence should be changed to reflect that this is true under today's conditions.
34. Page 4-5, 3<sup>rd</sup> paragraph: The third sentence should not read that the 100 Area Burial Grounds "do not" contain Category 3 waste but should indicate we think they do not contain Category 3 waste.

35. Page 4-5, 4<sup>th</sup> paragraph: The first sentence discusses design requirements. What design requirements? Please clarify. Also, how does a barrier reduce regulatory compliance time? Please clarify.
36. Page 5-2, 1<sup>st</sup> paragraph: Please include text to describe the differences and the similarities between the municipal and military landfill remediation sites and the 100 Area Burial Grounds with regard to your statement that extensive waste characterization is not required (or encouraged) at these sites to support containment. Also, the text in this paragraph should be expanded to discuss the information gained from burial ground 118-B-1.
37. Page 5-3, Section 5.3.1, 1<sup>st</sup> paragraph: It needs to be identified where the soil backfill will come from for both the RTD and Containment alternatives. The location of the source will be a big factor in the cost of the alternatives and this factor has not been clearly addressed.
38. Page 5-5, Section 5.4.1, 1<sup>st</sup> paragraph: Since the wastes in the burial grounds have not been characterized, how do we have any confidence that 100 years of protection is enough? Please expand to clarify. Also see General Comment #6.
39. Page 5-5, 4<sup>th</sup> paragraph: EPA and Ecology understand that the materials from McGee Ranch are protected and will not be used for backfill. Please clarify.
40. Page 5-6, last paragraph: How can we say with confidence that existing information is adequate to predict the reduction of radiation for the 100 Area Burial Ground wastes if the burial ground wastes have not been characterized and are "unknown" as you stated on page 5-1, Section 5.1, in the 1<sup>st</sup> paragraph. Since the radiation levels are not known, they will need to be monitored. Please clarify.
41. Page 6-9, 4<sup>th</sup> paragraph, last sentence: This statement should recognize that the expansion of ERDF has already been discussed with the public and an evaluation of impact to resources has already been completed. Modify the text to include.
42. Page 6-9, last paragraph: This paragraph is based on work at 618-4 but totally ignores the work done at 118-B-1. EPA and Ecology believe most of the burial ground work will be similar to the work completed at 118-B-1 where no level B Personal Protective Equipment (PPE) was required. The text should be modified to reflect this. In addition, costs for RTD should be re-evaluated.
43. Page 6-11, last paragraph: Are the costs shown for the RCRA-compliant surface barrier only for that portion that would contain the wastes from the 45, 100 Area burial grounds? Please clarify.
44. Page 6-13, 1<sup>st</sup> and 4<sup>th</sup> paragraphs: These paragraphs are contradictory in that the 1<sup>st</sup> paragraph states "the surface barrier would also eliminate any potential for contaminants to migrate to the groundwater," whereas the 4<sup>th</sup> paragraph states "should a burial ground contain inventories of mobile contaminants, the containment alternative is still considered protective of human health and the environment" and "should groundwater be impacted, contingency plans would remain in place to provide corrective action." The main point here is that we don't know what is contained in the burial grounds, not even whether or not mobile wastes are contained in them. Under these circumstances, the containment alternative is not a viable option. Please modify as needed to be more consistent.

45. Page 6-13, Section 6.2.3.1.2: Compliance with ARARs – Please state specifically which ARARs the containment alternative is compliant with, and more specifically, list the ARAR for the restricted rural residential use scenario. Just saying “The containment alternative **would be expected to comply with all ARARs** is not definitive.
46. Page 6-14, 3<sup>rd</sup> paragraph: The document states that “nonradionuclide contaminants will require a longer period of time to attenuate to protective levels.” In other parts of the document it is stated that the contaminants under the cap **will not be mobile**; therefore, there is no mechanism for many of these contaminants (i.e., metals) to attenuate since they do not decay or breakdown, and they will not disperse if they are not mobile. Please clarify.
47. Page 6-14, Section 6.2.3.1.4: MTCA does not recognize attenuation as a treatment action and EPA and Ecology have not used decay as a treatment in past RODs. Please include this language. Also, the paragraph ignores all hazardous constituents that are not radioactive. The text should be modified to discuss hazardous constituents.
48. Page 6-15, 2<sup>nd</sup> paragraph: This paragraph should discuss environmental impacts to borrow sites.
49. Page 6-16, Section 6.2.3.2, 1<sup>st</sup> paragraph: There is no discussion of non-radioactive contaminants in this paragraph. Expand text to discuss the affects of natural attenuation on non-radioactive contaminants. Also, it is not true that “no future land use for the 100 Area considered by the USDOE would be affected by the containment alternative.” Please clarify.
50. Page 6-18 and 6-19, Tables 6-1 and 6-2: There is not enough data provided in the text or in Appendix E to know how the cost numbers presented in these tables were derived and why there is such a discrepancy in the costs for the two alternatives. More cost detail is needed to justify the much higher costs for the RTD alternative. Also see general comments #10 and #12.
51. Page 7-1, Section 7.1.2, 1<sup>st</sup> paragraph: EPA and Ecology disagree that Containment alternative complies with ARARs (see general comments). Please add more specific justification. Also, why is the discussion of 118-F-2 located here? Please delete.
52. Page 7-2, 3<sup>rd</sup> paragraph: This paragraph discusses long-term effectiveness of the barrier but the detailed analysis only carries out to 100 years. Given the unknown natural of burial ground contents, EPA and Ecology require the analysis to be carried out to 1000 years. Cost tables should be revised accordingly. Also see general comment #4.
53. Page 7-3, 1<sup>st</sup> paragraph: On page 6-13, 1<sup>st</sup> paragraph it was stated that “the surface barrier would also eliminate any potential for contaminants to migrate to the groundwater” while in other places in the document you state that the contaminants beneath the cap will be essentially immobile. In this paragraph you are now saying that “an engineered surface barrier would limit infiltration, thereby **reducing** the mobility of any contaminants.” You can’t have it both ways and if containment can’t guarantee that contaminants will not migrate to groundwater, the alternative is not acceptable. Please clarify.
54. Page 7-3, 2<sup>nd</sup> paragraph in Section 7.1.5: This paragraph states that multiple handling of material would be required. EPA and Ecology believe that most of the material will not require multiple

handling. It is not clear how USDOE's assumption about multiple handling factored into the cost for RTD. Please clarify. Also, this paragraph should be modified to indicate that the waste sites are already located in disturbed areas. See General Comment #14.

55. Page 7-4, Section 7.1.7: Not enough information is provided to know if the cost differential is really accurate. For example, what were the assumed costs for transportation and backfill material for the RTD alternative, what were the assumed cost for transportation and cover material in the containment alternative, what were the assumed long-term monitoring and security costs for the containment alternative, and what will the containment costs be if the time frame is more than 100 years. Please provide additional information to clarify.
56. Page 7-5, Section 7.1.8, 2<sup>nd</sup> paragraph: It does not appear that excavation would cause much disturbance to cultural resources contained at the site because these area have already been excavated and disturbed when the materials were initially buried. Modify text.
57. Page 7-5, 2<sup>nd</sup> and 3<sup>rd</sup> paragraphs in Section 7.1.8: The whole discussion on irreversible and irretrievable commitments of natural resources is biased towards containment. Please explain how the RTD alternative could impact the environment more than capping.
58. Pages 7-10 and 7-11, Figures 7-1 and 7-2: These figures are useful but EPA and Ecology question the large discrepancies in the costs of the too alternatives. As discussed in some of the above comments, not enough cost data has been provided in the FFS to know if these cost numbers are realistic.
59. Page 8-1, Section 8.1, 2<sup>nd</sup> paragraph: EPA and Ecology disagree with the statement "the RTD would be significantly more costly to implement than the protective and ARAR compliant containment alternative." Given our earlier comments, the RTD alternative performs better than the containment alternative. EPA and Ecology believe the costs presented for RTD are overstated while containment has been minimized. Based on our previous comments, the text should be modified.
60. Appendix A, Page A-8, Table A-3: Table A-3 should include a column for the Operable Unit designation as per the Tri-Party Agreement (TPA).
61. Appendix B, Page B-2, Section B2.0, 2<sup>nd</sup> paragraph: The EPA guidance is 15 mrem/yr above background for 1000 years following remediation (EPA, 1997) as you have stated in Appendix C, page C1-2. Please modify.
62. Appendix B, Page B-21 and B-24, Table B-2: Under the column Applicable, Relevant and Appropriate, to be Considered, all rows stating "Relevant and appropriate" for MTCA should also state "Applicable."
63. Appendix B, Page B-28, Table B-2: We question the last ARAR Citation, *Richland Pretreatment Ordinance*, City of Richland Ordinance No. 35-84. It should probably be removed from the table.
64. Appendix C, Page C1-2, Section C1.2: The MTCA requirements are clearly stated in the first paragraph of this section. The fact that "groundwater is unlikely to become contaminated through

migration of burial ground contamination,” as stated in the second paragraph of this section is not sufficient assurance that the MTCA requirements will be satisfied. Please clarify.

65. Appendix C, Page C1-11, Table C1-3: The risks presented in this table for Unrestricted Land Use are really the risks for the No Action alternative and should be labeled accordingly. Under the Unrestricted Land Use alternative, the waste would be removed and the risks should essentially be zero, not greater than the Restricted Land Use alternative. Please clarify.
66. Appendix D, Pages D-1 and D-2, Table D-1: The “Relative Cost” for excavation and disposal (onsite) are listed as “Low” in this table whereas the “Relative Cost” for an engineered cap is listed as “Medium.” This is inconsistent with what you have stated throughout the document. Please clarify.
67. Appendix E, Page E-4, 7<sup>th</sup> bullet: How is access to the contained burial grounds going to be controlled if security fencing and signs *are not* required? WAC 173-340-440 requires institutional controls if containment is selected as the cleanup action for a site and the controls must remain in place until residual hazardous substance concentrations no longer exceed site cleanup levels established under MTCA.
68. Appendix E, Page E-4, Section E3.2, 1<sup>st</sup> paragraph: O&M costs for the barriers will be needed for 100 years and 1000 years. Please include both.
69. Appendix E, Pages E-6 through E-9, Tables E-1 and E-2: It appears that these two tables were switched in that Table E-1 presents the costs for the Containment alternative and Table E-2 presents the costs for the RTD alternative. The RTD alternative costs presented in Table 8-1 on page 8-4 match the Containment alternative costs presented in Table E-2. Please make the necessary changes. Also see General Comment #12.

### Administrative Comments

1. Page ES-2, last paragraph, 2<sup>nd</sup> sentence: The 9 criteria of CERCLA should be added to the list of what was used to evaluate the protectiveness of the alternatives.
2. Page 1-2, 2<sup>nd</sup> paragraph: The third sentence should say "EPA and Ecology" will... Delete the last sentence of this paragraph.
3. Page 1-2, 3<sup>rd</sup> paragraph: First and second sentences should be combined and read "After the interim action ROD is signed, Ecology will **coordinate the modification of the Hanford Facility RCRA Permit (Ecology 1994)** to incorporate the burial ground CERCLA remedial action ROD into the RCRA Permit for RPP sites.
4. Page 1-3, 1<sup>st</sup> paragraph: Delete the words "and RCRA permit modification."
5. Page 2-4, last sentence in Section 2.1.7.1: Add the following to the end of the sentence: "and disposed in the 200 West Area as stated in a separate ROD."
6. Page 3-9, 1<sup>st</sup> bullet under Section 3.6: Add "for radionuclides" to the end of the sentence.
7. Page 4-4, last paragraph: Change "should satisfy" to "will satisfy."
8. Appendix C, Page C1-2, Section C1.2, 2<sup>nd</sup> paragraph: Kd is a distribution or adsorption coefficient, not a diffusion coefficient.
9. Appendix C, Page C1-3, 5<sup>th</sup> paragraph: The first sentence should read "...in direct contact with the contents *of the* burial grounds or from..."
10. Appendix C, Page C1-4, 3<sup>rd</sup> paragraph: The third sentence should read "Under the Recreational Land Use alternative, nine of the 27 ~~of the~~ burial grounds *for which data were available* present total risks of ..."