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

01-ERD-071

**APR 26 2001**

Mr. Douglas R. Sherwood  
Hanford Project Manager  
U.S. Environmental Protection Agency  
712 Swift Boulevard, Suite 5  
Richland, Washington 99352

**RECEIVED**  
MAY 30 2001  
**EDMC**

Dear Mr. Sherwood:

**REQUEST FOR CONCURRENCE ON 100-B-12 REMEDIATION STRATEGY**

As you know, there are four metal boxes containing filters and six filter frames resting on soil in the 100-B-12 Area of the U.S. Department of Energy, Richland Operations Office's (RL) Hanford facility. This site is located in the northwest corner of the 100-BC Area and is classified a radiological materials area (RMA). We believe the filters were brought into the area in the 1980s, before approval of the original 100 Area Record of Decision (ROD) and the Remaining Sites ROD. RL believes that this material qualifies as legacy waste, which may be included in the Remaining Sites ROD, and that adding this site to the ROD is consistent with the U.S. Environmental Protection Agency's (EPA) interpretation of a "minor or non-significant change," as defined by the EPA's "Guide to Superfund Proposed Plans, Records of Decision and other Remedy Selection Decision Documents." The guide provides that such changes need only be documented in the post-ROD file (e.g., RD/RA case file) or in a remedial design fact sheet that can be released to the public.

In this case, however, it appears that the Remaining Sites ROD anticipated the possibility for new sites to be discovered and provided a mechanism for sites with common profiles to be plugged-in to the ROD. The ROD provides that "plug-in" decisions should be brought to the public's attention through "periodic" publication of a document referred to as an Explanation of Significant Differences. Based on this language in the ROD, we believe that removal of the filter boxes and frames for treatment and disposal at the Environmental Restoration and Disposal Facility should proceed immediately.

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If you agree with this approach, please forward your consent to proceed. Otherwise, please forward a copy of the written memorandum that you have drafted to support this action, consistent with EPA Guidance, so that it may be included in the post-ROD administrative file.

If you have any questions, or wish to discuss this matter further, please contact Glenn Goldberg of my staff on (509) 376-9552.

Sincerely,



Owen Robertson, Acting Director  
Environmental Restoration Division

ERD:GIG

cc: V. R. Dronen, BHI  
J. R. James, BHI  
F. V. Roeck, BHI  
R. J. Woods, BHI  
D. A. Faulk, EPA  
Admin Record, H6-08 (100-B-12)