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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10 HANFORD PROJECT OFFICE
712 SWIFT BOULEVARD, SUITE 5
RICHLAND, WASHINGTON 99352

November 28, 2001

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EDMC

Arlene Tortoso
Project Manager
U.S. Department of Energy
Richland Operations Office
P.O. Box 550, A6-38
Richland, WA 99352

RE: Concern Over an Assumption in the Canyon Disposition Initiative (CDI) Final Feasibility Study

Dear Ms. Tortoso:

The Washington State Department of Ecology (Ecology) and the U.S. Environmental Protection Agency (EPA) require a change in the assumptions section of the discussion of Alternative 6 in the Final Feasibility Study for the Canyon Disposition Initiative (221-U Facility [DOE/RL-2001-11 Rev. 0]). During recent discussions about the CDI preferred alternative and 200 Area operable units, it became clear that an assumption about the preferred alternative in the Final Feasibility Study needs to be replaced. Assumption number 5 in Appendix H - Detailed Description of Alternative 6: Close in Place-Collapsed Structure (and in all other disposal alternative sections) needs to be replaced as it does not adhere to the precedent set by other decontamination and decommissioning (D & D) projects at Hanford. Other D & D remedial actions have included remediation of adjacent waste sites whose removal was necessary to complete the primary remedial action. 5544 S

The new assumption needs to make a distinction between waste sites (including soil sites) that must be remediated or removed in order to implement the primary remedial action, with those that are only influenced by the environmental cap. The outlying waste sites that may be under or adjacent to the environmental cap, but whose removal is not a prerequisite for implementing the primary remedial action (in this case for the U-Plant), must be remediated as part of their respective operable units. These sites will not be part of the remedial action for the U-Plant. However, the outlying sites will need to be addressed before emplacement of the environmental cap.

The additional costs of including adjacent waste sites to the U-Plant remedial action under any of the disposal alternatives would be minimal compared to the total scope of each alternative.



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If you have any questions, feel free to contact either of us.

Sincerely,

Handwritten signature of Matt Mills in black ink.

Matt Mills
Ecology Unit Manager

Handwritten signature of Craig Cameron in black ink.

Craig Cameron
EPA Project Manager

cc: Gary MacFarlan, BHI
Charles Hedel, CHI
Admin. Record - Canyon Disposition Initiative