



U.S. ENVIRONMENTAL PROTECTION AGENCY
HANFORD PROJECT OFFICE
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December 16, 2020

Mark French, Director
Project and Facilities Division
Richland Operations Office
U.S Department of Energy
P.O. Box 550, M/S H5-20
Richland, WA 99354

Dear Mr. French:

This letter transmits EPA comments (see enclosure) on DOE-RL-2020-39 Draft A, *Engineering Evaluation/Cost Analysis for the 200 West Area Tier 2 Buildings/Structures*. Supporting comments from the State of Washington Department of Ecology and Department of Health Air Radiation Protection program are included with EPA's comments. Please contact me if you have questions. Once comments are addressed, we agree that the final EE/CA and transmittal letter can serve as concurrence regarding the provisions of Tri-Party Agreement Action Plan 7.2.4 relating to consistency with future remedial action and impact to existing schedules.

EPA looks forward to continuing progress on building decontamination and demolition in the 200 West Area.

Sincerely,

CRAIG CAMERON
Digitally signed by CRAIG CAMERON
Date: 2020.12.16 14:57:35 -08'00'

Craig Cameron
Project Manager

Enclosure: Comments on 200 West Tier 2 EE/CA December 2020

ecc: Patty Ensign, DOE-RL
John Temple, Ecology
Crystal Mathey, WDOH
Susan Leckband, HAB
Maxwell Woods, ODOE
Mason Murphy, CTUIR
Jack Bell, Nez Perce Tribe
Laurene Contreras, Yakama Nation
Rex Buck, Wanapum
Administrative Record: 200 West Tier 2 Removal Action

U.S. Environmental Protection Agency Comments (including support agency comments) on Engineering
Evaluation/Cost Analysis for the
200 West Area Tier 2 Buildings/Structures (DOE/RL-2020-39, Draft A)

Craig Cameron, EPA Project Manager

December 2020

1. Please add EPA to the acronym list. EPA needs to be listed as the lead regulatory agency up front in the document.
2. Should the document refer to “Tier 2” or “Tier II”? Please be consistent with what is in the TPA.
3. What is the TSD status of the buildings or parts of the buildings and are some of them within ORP controlled areas? Will some of these areas need to be consistent with future cleanup actions that are not covered under CERCLA?
4. Keep in mind that the administrative record for this needs to be established and be available at the time the EE/CA goes out for public comment as the materials on which the decision is ultimately based need to be within the AR. There should be a link to the AR file and the public comment instructions portion that explains how and when to provide comments. Also, do not forget the notification and fact sheet processes and timing.
5. It appears DOE is only following half of the provisions in TPA Action Plan section 7.2.4. The part about not blowing the established schedules by funding this work has not been attested. Also, it is difficult for the EE/CA to serve as the only part of proposal for an interim response action. At the very least, DOE needs to attest in a letter (maybe transmitting the final EE/CA prior to public comment or possibly the comment response record) that the non-time critical removal action will be consistent with and not adversely impact future remedial action and also not negatively affect current milestone schedules.
6. Speaking of schedules, what are the bite sized pieces of this work that you could do at one time without pausing? How long will it take to decontaminate and demolish each of these buildings once they are started? We are particularly interested in the budgeting and lifecycle of work to deal with 231-Z.
7. Page 2, line 30. What is meant by “environmental review requirements”?
8. In Section 1.1, page 3 it is mentioned that DOE will consult with both Ecology and EPA. Is this an artifact of language from the East Area Tier 2 or does this have to do with ARARs, TSDs and the

Air Operating Permit (AOP/license)? Has the transition language from the AOP to a CERCLA air monitoring plan been shared with Ecology and Health's Air Radiation Protection program?

9. The EE/CA needs to be very explicit about any future use of the plug-in process that would be provided for in the Action Memorandum. The public, Tribes and stakeholders need to understand how this would work so they can comment appropriately if they wish during the comment period (or in the case of Tribes during technical meetings or consultation if they request it). Using the building classification processes described and illustrated in Section 8 and Appendix J of the TPA Action Plan do make sense as long as the plug-in of additional Tier II West buildings is spelled out in the EE/CA and eventually in the Action Memorandum. Along these lines, if a building ends up being reclassified and taken out of the scope, there needs to be some notice to the public and others and the change added to the AR/site file for this removal action.
10. We noticed there were only English measurements given. If this were an EPA document, we would need to also provide the metric equivalent (understanding that we do not insist on all the System Internationale units like for radiation and activity).
11. Section 2.5. Seems like a statement about exceeding the CERCLA risk range if exposed to contents of these buildings would bolster the case for the action. Not just if there was an air emission if the facility deteriorates, but also some form of inadvertent intrusion in the future if site controls fail.
12. Please call out ERDF and the CERCLA storage areas of CWC as "onsite" with this action. Any liquid wastes that cannot be solidified and meet ERDF waste acceptance criteria may need to go to an effluent treatment facility. You may need to receive an offsite determination from EPA R10's offsite coordinator if you sent to ETF or other permitted facility. Please do not confuse "on the Hanford site" with "onsite" under CERCLA.
13. Note that the removal action work plan that comes after the Action Memorandum will need a waste management plan, air monitoring plan and SAP(s) that should be considered part of the work plan.
14. There is a reliance on covers and site controls for what is left after the removal action to be dealt with by future remedial action. Are some of these buildings simple enough that they could be fully removed (including below grade) and there wouldn't have to be as much reliance on babysitting them until a remedial action is implemented?
15. The older East Area Tier 2 EE/CA provided NEPA values to consider. Is it no longer policy that DOE adds those considerations? We recognize functional equivalency, but some of the discussion in the NEPA value subsection from before may be useful for this EE/CA.
16. The East Area Tier 2 EE/CA not only listed the buildings but also the estimated waste quantity. Please add those estimates for these buildings.

17. A couple of the Removal Action Objectives that were in the East Area Tier II were combined. Does this confound the ability to achieve them as written? Why were they combined in this document?
18. What type of reporting is considered for completion of the field work? One report after all done or individual ones for buildings or groups of buildings. Keep in mind that technically the removal action is not complete until the waste has all been disposed of so anything that must wait to go to WIPP may require some nuance in reporting.

Washington Department of Ecology supporting comments

1. Add WAC 173-400-035(3) for use of ultra-low sulfur diesel (or other appropriate fuels) in nonroad engines not meeting certain exemptions.
2. Add WAC 173-303-64620, WAC 173-350-025, WAC 173-350-040, WAC 173-350-900, and WAC 173-303-145(3).
3. WAC 173-400-040: the discussion seems to indicate that -040(3) and (8) are the only specific sections which would likely apply. However, there does not seem to be a clear reason to cite those over the 20% opacity standard [-040(2)], fugitive emissions [-040(4)], odors [-040(5)], emissions detrimental to persons or property [-040(6)], and fugitive dust [-040(9)]. If the intent was to highlight the most important subsections then the fugitive emissions in [-040(4)] is more important than concealment and masking in [-040(8)]. The description discusses most of these requirements but the Regulatory Citation column seems to be more limited.

Washington Department of Health Air Radiation Protection comments

Item	Page #/Line#	Comment	Justification	Recommendation
1	Pg.14, line 13 Table 1. 200 West Area Tier 2 Buildings/Structures within the Scope of This EE/CA	USDOE will need to close emission units (EUs) 1038 (231Z), 1107 (292S) & 1108 (292T) using the notice of transition process to CERCLA to perform demolition work. This should also be done for any other structures/ EUs moved to Table 2-1 of the FF-01 prior to starting the CERCLA work. Table 2-1 does not allow demolition or operational activities/.	Demolition activities aren't allowed for the emission units listed in Table 2-1 of current FF-01 as these are classified as non-operational diffuse & fugitive units. RADIOACTIVE AIR EMISSIONS LICENSE For The Department of Energy Richland Office Hanford Site Issued by The State of Washington Department of Health Office of Radiation Protection Radioactive Air Emissions License Number:	For structures that are emission units listed in the FF-01 Table 2-1, USDOE should follow the same process used to transition EUs w licenses in the FF-01 to CERCLA, i.e. the Notice of Transition (NOT) process.

			FF-01, Table 2–1. The List of Current Diffuse or Fugitive Radioactive Air Emission Sources at the Hanford Site. See Section 5.0, Method for Monitoring and Reporting of Diffuse and Fugitive Sources and Emissions, of the License for a description of monitoring and reporting requirements.	
2	Pg 14, line 12 Section 2.4.2 Radiological Hazards	Recommend more detail regarding nuclides of concern	WAC 173-480-040, “Ambient Standard”	Include all radionuclide inventory in next draft or document. Currently states “contaminants include, but are not limited to..” no quantities specified.
3	A-11/ ARAR Citation WAC 246-247 Specific subsections	Recommend adding Specific subsection. 246-247-035(1)(a)(i) & (ii) as ARARs. Some related CFRs are ARARs, but WAC references should also be called out to address standards adopted	WAC 246-247-035 (1)(a)(ii)	Request to add Specific subsection 246-247-035 to (1)(a)(i)& (ii) to A-11/ ARAR Citation WAC 246-247 Some related CFRs are ARARs, but WAC references should also be called out.
4	A-12/ ARAR Citation WAC 173-480-060, “Emission Standards for New and Modified Emission Units	Will portable exhausters or new point sources be utilized?	WAC 173-480-060	If portable exhausters will be used WDOH recommends an Exhauster Agreement to demonstrate BARCT