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STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

7601 W. Clearwater, Suite 102 • Kennewick, Washington 99336 • (509) 546-2990

April 20, 1994

Mr. Elwood Patawa  
Chairman, Board of Trustees  
Confederated Tribes of the Umatilla Indian Reservation  
P.O. Box 638  
Pendleton, OR 97801



Dear Mr. Patawa:

The Washington State Department of Ecology (Ecology) is pleased to receive your comments on the Remedial Investigation/Feasibility Study Work Plan for the 200-UP-1 Groundwater Operable Unit, Hanford Site, Richland, Washington (Work Plan). Your comments and questions related to this Work Plan are addressed in this letter.

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As you are aware, the recent Tri-Party Agreement (TPA) incorporated many aspects of the groundwater remediation (e.g., pilot-scale pump and treat for uranium and technetium, as well as lab and bench studies for the nitrate removal of the IRM plumes in the 200 UP-1 groundwater operable unit, etc.) in order to accelerate the groundwater remediation at Hanford. The initial copy of the 200-UP-1 Work Plan did not cover many aspects of the new TPA agreements. The results of the recent TPA negotiations related to the 200-UP-1 OU were finally incorporated in the Work Plan. Some of the related groundwater issues are still being discussed by the three-parties, stake holders, Hanford advisory Board, and public, under the "refocussing of the environmental restoration program." Any future changes to the work plan that might arise as a result of these discussions, will be made accordingly.

**Specific Comments:**

A.1. The scientific explanations related to the Work Plan are written as simply as possible. Due to the complicated nature of the problem associated with this operable unit, some of these explanations may be difficult for people having little or no background in certain specific field(s). However, every effort was made to make the revised document as understandable as possible for readers of diverse groups.

A.2. Regarding the accessibility of certain referenced documents, there are four information repositories and three additional information centers where interested parties can review Hanford documents. Documents that are made available for purposes of public comment, as well as any supporting documents, are routinely placed in these

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locations prior to the initiation of, and announcement of associated public comment periods. Ecology always tries their best to provide any copies that are available to interested parties.

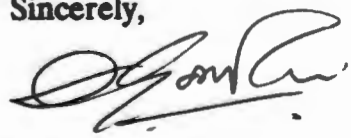
A.3. The objective of the 200-UP-1 Work Plan is to investigate the vertical and horizontal distribution of contaminants in the operable unit and to implement interim actions to begin remediation of contaminants known to exceed appropriate standards. With this in mind, the principal data collection efforts are focused on better defining the physical and chemical properties of specific areas where remediation is expected to occur. As a secondary objective, additional data gathering activities are focused to provide information on the nature and extent of contamination for areas in which limited data exist, and where the potential need for remediation is uncertain. This document is not intended to integrate the NEPA processes with CERCLA and RCRA decision making processes.

B.1, 2, and 3. Ecology supported your recommendation of starting remedial action on the uranium, technetium, and nitrate plumes immediately. As noted above, one of the main TPA issues negotiated was the start of the pilot-scale remedial action in the 200-UP-1 for uranium and technetium and lab and bench scale studies for nitrate by March 31, 1994. Accordingly, the pump and treat has already started. Once these tests are proved successful, remediation activities will be gradually accelerated to a full scale.

B.4. Both human health and ecological risk assessments will be carried out, and the data will be presented in the forthcoming feasibility study and risk assessment reports.

Ecology appreciates your input on the 200-UP-1 Work Plan. If you have any questions, please feel free to call me at (509) 736-3015.

Sincerely,



Dib Goswami  
Unit Manager  
Nuclear Waste Program

DG:mf

cc: Paul Pak, USDOE  
Dave Einan, EPA  
Administrative Record (200-UP-1 OU)

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# CORRESPONDENCE DISTRIBUTION COVERSHEET

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subject: REMEDIAL INVESTIGATION/FEASIBILITY STUDY WORK PLAN FOR THE  
200-UP-1 GROUND OPERALBE UNIT HANFORD SITE

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