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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
HANFORD/INL PROJECT OFFICE
825 Jadwin Ave., Suite 210
Richland, Washington 99352

OFFICE OF
ENVIRONMENTAL
CLEANUP

December 13, 2018

Michael Cline, Director, Soil and Groundwater Division
Richland Operations Office, Mail Stop H5-20
Department of Energy
PO Box 550
Richland, Washington 99352

RE: Review of Remedial Design Investigation Report for the 200-UP-1 Operable Unit Southeast Chromium Plume, DOE/RL-2017-60, Draft A

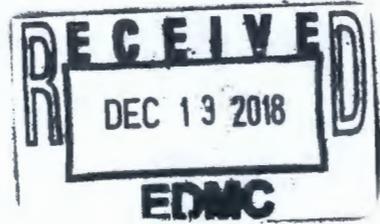
Dear Mr. Cline:

Your office provided the referenced document for review to the U.S. Environmental Protection Agency (EPA) and by doing so completed the Tri-Party Agreement Milestone M-016-193, "Complete the remedial design investigation of the southeast chromium plume, including the installation of new wells and evaluation of groundwater monitoring data and install monitoring wells needed for remedy performance monitoring as defined in the 200-UP-1 RD/RA WP." After reviewing the document, EPA does not have page-specific comments to provide. However, we have two general comments that should be addressed before the document is finalized.

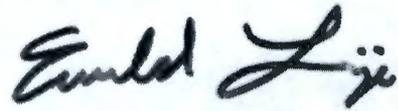
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1. EPA has serious concerns over the accuracy of cost estimates provided for this work and how much higher they are in comparison to the overall remedy identified in the 2012 200-UP-1 Interim ROD. These costs should be verified, possibly independently, before the document is finalized.
2. Based on the concern over the accuracy of cost estimates and the time to achieve remedial action objectives (RAOs), EPA believes Option 2, Pump and Treat for Source Control and Southeast Chromium Plume and Monitored Natural Attenuation (MNA) for Southeast Chromium Plume, with a 120-year timeframe is the most appropriate option at this time.

Part of the reasoning for Option 2 is that it aligns more closely with the timeframe identified in the 200-ZP-1 Operable Unit (OU) Record of Decision (ROD) timeframe of 125 years to achieve RAOs. Selecting an interim remedy component with a longer RAO achievement timeframe is not consistent with the 200-ZP-1 OU final remedy. Option 1's timeframe of 275 years is 155 years longer than the timeframe identified in the 200-ZP-1 OU ROD. You or your staff are welcome to contact me at Laija.emerald@epa.gov with any questions or concerns. EPA requests an update on the cost estimate verification before the document is finalized.



Sincerely,



Emerald Laija
Remedial Project Manager

Cc (electronically):

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Administrative Record (200-UP-1 OU)
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