

S&GRP Central Plateau Remediation Project
DOCUMENT REVIEW AND COMMENT FORM

1. Date: 11/20/2007

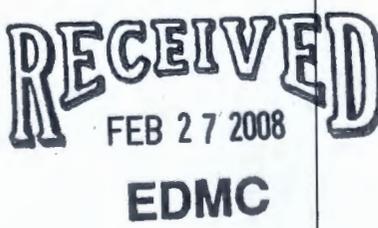
2. Page 1 of 4

3. Project: 200-PW-1/3/6 OUs
 Feasibility Study

4. Review No: DOE/RL-2007-27,
 Draft A

5. Document Number(s)/Title(s): DOE/RL-2007-27, Draft A Feasibility Study for the ... 200-PW-1, 200-PW-3, and 200-PW-6 Operable Units	6. Program/Project/Building Number	7. Reviewer Ecology	8. Organization/Group Washington Department of Ecology	9. Location/Phone
---	------------------------------------	----------------------------	---	-------------------

12. Comment Submittal Approval (optional): _____ Reviewing Organization Manager (print / sign) _____ Date	15. Concurrence with indicated comment disposition(s) _____ Date _____ Date	17. Closure Approval <input type="radio"/> No Comments (Disposition status is either "Open", "Closed", etc.) _____ Date _____ Date
---	---	--

Item	10. Page/Line	11a. Comment (include technical justification for comment)	11b. Recommended Change	13. (A)cccept or (R)reject	14. Disposition (provide justification if NOT accepted)	16. Status
1	General	<p>ARARs. Add the following citation WAC 173-303-64620.</p> <p>The State ARARs are incomplete in the FS, Appendix C does not have WAC 173-303-64620. The applicable requirements for corrective action under the HWMA must be met for the proposed final action.</p> <p><i>WAC 173-303-64620(1) For all releases of Dangerous Waste and Dangerous Constituents ...</i></p> <p><i>WAC 173-303-64610(4) Defines any constituent that is a hazardous substance under MTCA</i></p> <p><i>WAC 173-303-040 "Facility" definition: ... means all contiguous property under the control of the owner/operator.</i></p> <p>Therefore, if there is a release of a MTCA hazardous substance within Hanford Boundaries (all ~560 sq. miles) it is within the scope of WAC 173-303-64620.</p>		Partially accept	<p>Both the Tri-Party Agreement and the Hanford Facility RCRA Permit acknowledge the process of considering both RCRA corrective action and CERCLA remedial action requirements at the same time. The final remedy decision will be made in order to satisfy both RCRA corrective action and CERCLA remedial action requirements.</p> <p>The substantive requirements of the Dangerous Waste Regulations (WAC 173-303) are evaluated and discussed in Appendix C of the feasibility study. Relevant and appropriate provisions of the Dangerous Waste Regulations are incorporated into Appendix C</p>	0076362
2	General	<p>ARARs. Add the following citation WAC 173-340.</p> <p>At a minimum, corrective actions must be consistent with the following requirements of Chapter 173-340 WAC.</p> <p>From the October 14, 1994, Ecology/EPA</p>		Not accepted	<p>Since Hanford is a Federal facility on the National Priorities list, MTCA is not applicable (42 U.S.C. 9620(a)(4)) (i.e., CERCLA Section 120(a)(4)). However, the citations noted in the comment were reviewed as to whether elements were relevant and appropriate.</p>	

DOCUMENT REVIEW AND COMMENT FORM

1. Date: 11/20/2007

2. Page 2 of 4

3. Project: 200-PW-1/3/6 OUs
Feasibility Study4. Review No: DOE/RL-2007-27,
Draft A

Item	10. Page/Line	11a. Comment (include technical justification for comment)	11b. Recommended Change	13. (A)cccept or (R)reject	14. Disposition (provide justification if NOT accepted)	16. Status
		<p>Agreement on Roles and Responsibilities at NPL Sites. The following citation are applicable (substantive). Add these citations:</p> <p>WAC 173-340-360 (4),(6)</p> <p>WAC 173-340-440</p> <p>WAC 173-340-450</p> <p>WAC 173-340-705, 706</p> <p>WAC 173-340-745</p> <p>WAC 173-340-747</p>			<p>The substantive requirements of WAC 173-340 were considered during the ARAR process for the FS. WAC 173-340-360(4), WAC 173-340-450, WAC 173-340-705, and WAC 173-340-706 are administrative in nature and therefore were excluded. Please note that some uncertainty exists as to the content of the citations recommended to be added because WAC 173-340 has been modified since 1994. In fact, WAC 173-340-360(6) does not exist in the latest revision and differences exist between the 1994 and latest version for those sections that were kept.</p> <p>Re: WAC 173-340-450 (Releases from Underground Storage Tanks). The only tanks this remedy addresses are 241-Z-361 and 241-Z-8. These tanks do not meet the definition of an underground storage tank in 90.76 RCW. Therefore, WAC 173-340-450 is not relevant and appropriate to this remedial action.</p> <p>Re: WAC 173-340-440. Section 173-340-440(3) states that "This section applies to remedial actions being conducted at sites under any of the administrative options in WAC 173-340-510 [Administrative Options for Remedial Actions] and 173-340-515 [Independent Remedial Actions]." Remedial actions for 200-PW-1/3/6 are not being undertaken under any of those options. Rather, remedial actions for 200 PW-1/3/6 are being undertaken under the authority of 42 U.S.C. 9620 (CERCLA Section 120). Therefore, WAC 173-340-440 is not a relevant and appropriate requirement.</p> <p>Re: WAC 173-340-745 and -747. For the 200-PW-1/3/6 preferred remedies, in all cases, the identified preferred remedial alternative for non-radiological COCs, all of which are volatile organic compounds, is soil vapor extraction (SVE). Soil vapor extraction works on a mass removal basis whereby organic vapors are extracted from the air in the soil</p>	

S&GRP Central Plateau Remediation Project
DOCUMENT REVIEW AND COMMENT FORM

1. Date: 11/20/2007

2. Page 3 of 4

3. Project: 200-PW-1/3/6 OUs
 Feasibility Study

4. Review No: DOE/RL-2007-27,
 Draft A

Item	10. Page/Line	11a. Comment (include technical justification for comment)	11b. Recommended Change	13. (A)cccept or (R)reject	14. Disposition (provide justification if NOT accepted)	16. Status
					<p>matrix. The remedial performance of an SVE system is judged by the effectiveness of the system at diminishing the mass of VOCs present in the vapor form. When included as part of a remedy, the decision as to when an SVE system has met its remedial objectives should be based on metrics that reflect progress made in removing the mass of VOCs from the air in the soil matrix within the soil zones targeted by the SVE system.</p> <p>USEPA provides guidance on determining whether a law or regulation is relevant and appropriate. <i>“Determining whether a requirement is relevant and appropriate is site-specific and must be based on best professional judgment. This judgment is based on a number of factors, including the characteristics of the remedial action, the hazardous substances present at the site, and the physical circumstances of the site and of the release, as compared to the statutory or regulatory requirement.”</i> (USEPA OSWER EPA/540/G-89/006, CERCLA Compliance With Other Laws Manual: Part I, Publication 9234.1-01, August 1988).</p> <p>Rationale: Applying the CERCLA guidance cited above, MTCA sections 173-340-745 and -747 are not relevant and appropriate given the key characteristics of the remedial action and the physical circumstances at the site for the following reasons:</p> <p>Invoking WAC 173-340-745 and WAC 173-340-747 as relevant and appropriate would result in developing soil concentration cleanup levels (in mg/kg). Measuring the concentration of VOCs attached to soil (i.e., in units of mg/kg) is not a proper technique to measure the effectiveness of the SVE remedial system. Therefore, MTCA Cleanup Regulation requirements are not relevant and appropriate</p>	

S&GRP Central Plateau Remediation Project
DOCUMENT REVIEW AND COMMENT FORM

1. Date: 11/20/2007

2. Page 4 of 4

3. Project: 200-PW-1/3/6 OUs
 Feasibility Study

4. Review No: DOE/RL-2007-27,
 Draft A

Item	10. Page/Line	11a. Comment (include technical justification for comment)	11b. Recommended Change	13. (A)cccept or (R)reject	14. Disposition (provide justification if NOT accepted)	16. Status
					The 200-PW-1/3/6 FS report discusses how metrics (remedy-specific, appropriate, cleanup goals) will be developed based on SVE operations; and that other vadose zone and groundwater monitoring will be implemented to determine when vadose zone cleanup for these COCs has been achieved and the system can be shut down. In addition, cleanup levels will be added that measure the success of the remedy using the remedy appropriate metric of parts per million vapor (ppmv).	
3	Appendix C	ARARs. Add Solid Waste Management, Recovery, and Recycling Act of 1969, RCW 70.95. WAC 173-304-190, -200, -460		Not accepted	Nondangerous waste regulations, WAC 173-304 and WAC 173-350 were considered during the ARAR process for the FS. Since the proposed remedial action would not likely generate any nondangerous waste, (the waste will either be dangerous or mixed), the substantive requirements of these regulations were not included in the ARAR table.	
4	Appendix C	ARARs. Remove all WAC 173-160-191, 201, 221, 231, 241, 271, 281, 291, 301, 311, 321, 331, 341, 351, 371, 381. These regulations are for water supply.		Accepted	These citations for water supply wells will be deleted.	