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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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January 20, 1995

Mr. Steve Wisness
Hanford Project Manager
U.S. Department of Energy
Richland Field Office
P. O. Box 550
Richland, WA 99352

Dear Mr. Wisness:

Re: 100N Area Pilot Project Management Plan Draft Dated May 26, 1994

The Washington State Department of Ecology and the Environmental Protection Agency have reviewed the above referenced document and are providing you with our comments. The applicable section precedes the comment and suggested resolution. In addition to the comments provided below, please find enclosed a marked copy of the draft document containing additional comments.

Should you or your staff have questions regarding this submittal, please do not hesitate to contact me at (509) 736-3029.

Sincerely,

A handwritten signature in black ink, appearing to read "Phillip R. Staats".

Phillip R. Staats
Unit Manager
Nuclear Waste Program

PS:skr

cc: Paul Pak, USDOE
Pam Innis, EPA
Administrative Records: 100-NR-1



**ECOLOGY COMMENTS
ON THE
100N AREA PILOT PROJECT
MANAGEMENT PLAN**

1. Executive Summary, page 1, paragraph 1, last sentence

Deficiency: The words "and integrated" should be deleted.

Recommendation: The sentence should read as follows: "Ecology, USDOE, and EPA have agreed to combine the 100N Area environmental restoration activities into a pilot project to demonstrate a coordinated ~~and integrated~~ cleanup effort."

2. Executive Summary, page 1, paragraph 2, first sentence

Deficiency: The use of the word integrating is inappropriate and should be replaced with the word coordinating.

Recommendation: The sentence should read as follows: "The 100N Area Pilot Project (Pilot Project) is an example of "regulatory streamlining," placing emphasis on ~~integrating~~ coordinating Resource Conservation and Recovery Act (RCRA), and Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) requirements, Expedited Response Actions (ERA), and deactivation and decommissioning (D&D) activities into a single manageable project."

3. Executive Summary, page 1, paragraph 2, last sentence

Deficiency: The use of the word integrate is inappropriate and should be replaced with the word coordinate.

Recommendation: The sentence should read as follows: "The purpose of this Pilot Project Management Plan is to ~~integrate~~ coordinate these activities into a single streamlined project as described above."

4. Executive Summary, page 1, paragraph 3, fifth bullet

Deficiency: The reference to "109 waste disposal" is unclear. Is 109 a building in which waste was generated and later disposed elsewhere, or is 109 a receiving facility (i.e., TSDf), which is now being identified as having received waste?

Recommendation: Please clarify the reference to 109.

5. Executive Summary, page 1, paragraph 4, first sentence

Deficiency: The sentence suggests the N Springs ERA is being prompted by the Pilot Project Management Plan. This is not the case. Clarification of the coordination of the ERA Action Memorandum and the Pilot Project Management Plan is needed.

Recommendation: The paragraph should read as follows: The N Springs Expedited Response Action is the highest priority action under the Pilot Project. N Springs are a series of natural groundwater seeps which carry strontium-90 to the Columbia River along the shoreline at N Reactor. An Action Memorandum issued by Ecology and EPA specifies the remedial actions to be taken to significantly reduce the release of strontium-90 to the Columbia River. This EXPEDITED RESPONSE ACTION will combine two systems, a grouted hinge sheet pile barrier and a pump and treat system.

6. Executive Summary, page 2, paragraph 2, last sentence

Deficiency: The statement, "The cribs will be covered with original spoil (dirt from the original excavation), which will provide sufficient shielding to protect workers and the public," presupposes an alternative selection by USDOE and concurrence obtained from Ecology and EPA has been obtained. Section IV. N Area Past Practice Site /RCRA TSD Activities, Milestone M-16-01-F, of the Pilot Project Change Package states, "USDOE will issue a letter report and schedules to Ecology and EPA, documenting alternatives proposed to abate 1301N and 1325N crib "skyshine", and any alternative interim abatement measure selected will be compatible with future final closure actions." The milestone date for this letter report is currently October 1994. If USDOE is currently in a position to recommend an alternative for skyshine abatement, Ecology and EPA look forward to receiving it. Adjustment of the aforementioned milestone date can be made.

Recommendation: I am pleased USDOE is ahead of its commitment to meet the October 1994 milestone for this action, however, the alternative selection of covering the cribs with original spoil has not yet been presented to Ecology and EPA, nor the justification of how this action will be compatible with future final closure actions. I look forward to receiving the work products required by Milestone M-16-01-F and, upon approval of the selected alternative by Ecology and EPA, skyshine abatement measures may be implemented. In the interim, please reword the last sentence of the referenced paragraph as follows: Skyshine abatement alternatives are being considered and will be documented in a letter report to Ecology and EPA. The abatement alternative will be compatible with future final closure actions of the 1301N and 1325N cribs.

7. Executive Summary, page 2, paragraph 6

Deficiency: The reference to the Restoration and Remediation division of the Westinghouse Hanford Company (WHC) is no longer valid.

Recommendation: Reword the paragraph to indicate Bechtel Hanford Incorporated (BHI), and its support contractors, are now responsible for managing the Environmental Restoration Contract.

8. Section 1.1, page 1, paragraph 1, third sentence

Deficiency: It is inappropriate to use the words "and integrated."

Recommendation: Revise the sentence to delete "and integrated" as follows: Ecology, USDOE, and EPA have agreed to use the 100N Area as a pilot project to ensure coordinated ~~and integrated~~ cleanup efforts.

9. Section 1.1, page 1, paragraph 3, first sentence

Deficiency: The word integrating should be replaced with the word coordinating.

Recommendation: Revise the sentence to replace integrating with coordinating as follows: "The 100N Area Pilot Project is an example of "regulatory streamlining, " and emphasizes ~~integrating~~ coordinating Resource Conservation and Recovery Act (RCRA), Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), ERA, deactivation, decontamination, and decommissioning (D&D) activities into a single, manageable plan."

10. Section 1.2, page 2, second sentence

Deficiency: The sentence states, "The reduction of skyshine is the Pilot Project's second priority." Executive Summary, page one, bullet three, and executive summary, page two, paragraph two, sentence one, indicate skyshine abatement is the third priority of the Pilot Project.

Recommendation: Please revise the document to be consistent throughout.

11. Section 1.5, page 5, title sentence

Deficiency: The statement is made, "The following assumptions govern the material in this Management Plan." Is the word material being used to describe the text, or is this a reference to the waste handling activities described by the document?

Recommendation: Please clarify the title sentence.

12. Section 1.5, page 6, first bullet

Deficiency: The statement is made, "The WHC decommissioning criteria and RCRA Closure Program acceptance criteria will govern cleanup and stabilization activities." Is this statement current, or should it be updated to reflect the criteria which will be used by BHI? There is no reference to RCRA, CERCLA, or the Washington State Hazardous Waste Management Act (HWMA).

Recommendation: Please update the bullet to reflect the current support contractor and its criteria and add the reference to RCRA, CERCLA, Model Toxics Control Act (MTCA), and the HWMA.

13. Section 1.5, page 6, last bullet

Deficiency: BHI is now the Environmental Restoration Contractor (ERC) management contractor. Have transition activities impacted the Pilot Project activities and, if so, how?

Recommendation: Revise the text to reflect the current ERC management contractor and provide an explanation of transitional impacts, if any.

14. Section 2, Page 8, Figure 2, Environmental Requirements column

Deficiency: The reference to the N Springs Action Memorandum, Washington State's HWMA, and the MTCA have been omitted.

Recommendation: Please revise the referenced column to include the N Springs Action Memorandum, HWMA, and the MTCA.

15. Section 2.1, page 9, first bullet

Deficiency: The Washington State HWMA has not been included.

Recommendation: Please provide a reference to the HWMA in this bullet.

16. Section 2, Page 9, Table 2

Deficiency: The wording and dates associated with the N Area Pilot Project (NAPP) change package are no longer correct.

Recommendation: Revise the table to reflect the NAPP change package language and dates.

17. Section 2.2.2, page 12, first paragraph

Deficiency: The HWMA has not been included as a regulatory statute, which governs the handling of hazardous waste in the state of Washington.

Recommendation: Please include a reference to the HWMA in this paragraph.

18. Section 2.2.4, page 13, first paragraph, fourth line

Deficiency: The sentence which reads, ". . . for N Basin work was approved by EPA in May 10, 1994," does not make sense.

Recommendation: Change the sentence to read as follows: ". . . for N Basin work was approved by EPA in on May 10, 1994."

19. Section 2.3.1, page 14, second paragraph, fourth line

Deficiency: The sentence which reads, ". . . a course of action for management to evaluation and select the best option," does not make sense.

Recommendation: Change to sentence to read as follows: ". . . a course of action for management to ~~evaluation~~ evaluate and select the best option."

20. Section 2.3.3, page14

Deficiency: This section states an As Low As Possibly Achievable (ALARA) plan has been prepared for the N Basin Cleanup activities. No mention is made of an ALARA plan for the other activities described by the Pilot Project, or if those plans will be prepared.

Recommendation: Provide a reference in this section to indicate an ALARA plan is, or will be, prepared for all activities described to be conducted under the NAPP Management Plan.

21. Section 3.2.2, page 17, first paragraph, seventh line

Deficiency: The statement is made "The basin sediments will be characterized and shipped to an appropriate Transfer, Treatment, Storage, or Disposal (TSD) facility. "This indicates a predisposition toward a hazardous or mixed waste. If USDOE has information indicating the constituents of the sediments are being regulated and require

disposition to a TSD, the information should be provided.

Recommendation: On the assumption, proper characterization of the sediments has not been conducted, it is more appropriate to state the sediments will be characterized and shipped to an appropriate TSD disposal facility.

22. Section 4.1, page 21

Deficiency: Skyshine abatement is identified as being the second priority of the NAPP. Reference comment number 10.

Recommendation: Please ensure the document is consistent throughout with regard to the order of the NAPP priorities.

23. Section 4.2.3, page 25, first paragraph, ninth line

Deficiency: This sentence is stated incorrectly and should be revised.

Recommendation: Please revise the sentence to read as follows: "An action memorandum is expected to be issued by Ecology and EPA in May 1994, specifically outlining all associated activities."

24. Section 4.2.3, page 27, fourth paragraph, second line

Deficiency: The sentence which reads, ". . . then disposition of the water it to a location as yet . . ." does not make sense and should be revised.

Recommendation: Please revise the sentence as follows: ". . . then disposition of the water it to a location as yet . . ."

25. Section 4.2.3, page 27, fifth paragraph, fourth line

Deficiency: The sentence states, "The pump and treat flow rate may range from 25 gpm to 150 gpm." The flowrates should be revised.

Recommendation: Please revise the sentence as follows: "The water extraction rate has not yet been determined and may range from 25 50 gpm to 150180 gpm."

26. Section 4.3, first sentence

Deficiency: The sentence states, "Skyshine abatement is the NAPP's second priority." Reference comments 10 and 22.

Recommendation: Revise the document to be consistent throughout.

27. Section 4.3.2, page 28

Deficiency: This section states, "A letter report, which evaluates skyshine alternatives and recommends a preferred alternative, is due October 30, 1994." The section continues by suggesting the evaluation has already occurred and a preferred alternative, covering the cribs with original spoil, has been selected. As stated in comment number six, Ecology is pleased by what appears to be the early completion of a milestone target, however, the letter report has not been issued, reviewed, or approved by EPA and Ecology.

Recommendation: Revise the second paragraph to indicate the following: "Skyshine abatement alternatives are being considered and will be documented in a letter report to Ecology and EPA. The abatement alternative will be compatible with future final closure actions of the 1301N and 1325N cribs."

28. Section 4.4.3, page 31, fourth paragraph, fourth line

Deficiency: The statement is made, "Participants in the SAFER process will include USDOE, Ecology, EPA, and WHC." This is incorrect, WHC is/was not a participant. The effort is now being conducted by BHI and this transition should be reflected in the document.

Recommendation: Revise the text as follows: "Participants in the process will include USDOE, Ecology, EPA and ~~WHC~~ BHI."

29. Section 4.4.3, page 32, second paragraph, second line

Deficiency: USDOE has specified detailed analyses, to determine a clean closure strategy for the cribs, will be conducted as part of the Corrective Measure Study (CMS). Is clean closure the strategy USDOE wishes to pursue, or would it be more appropriate to simply state the detailed analysis will determine a closure strategy?

Recommendation: The language appears to be too specific, as it defines a pathway without the benefit of the analysis projected to be conducted. You may wish to reword this sentence as suggested above.

30. Section 5.2, page 35, third paragraph, first line

Deficiency: The sentence currently states, "All asbestos including a insulated piping," This does not make sense, unless there is only one insulated pipe to deal with.

Recommendation: Please revise the sentence to delete the word a, or change the word piping to pipe.

31. Section 7.1, page 47, second paragraph, sixth line

Deficiency: The sentence currently reads, "Although the decision to combine the Pilot Project funding sources into a single ADS, it has not yet been accepted."

Recommendation: Obvious.

32. Attachment II, page 60, sixth line

Deficiency: The line currently reads, "USDOE MEMORANDUM - Disposition of N Reactor, August 28, 1001." Either this is a very, very old document, or the date is incorrect.

Recommendation: Please correct the date of the document.