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Mr. Steve M. Alexander
Perimeter Areas Section Manager
Nuclear Waste Program
State of Washington
Department of Ecology
1315 W. Fourth Avenue
Kennewick, Washington 99336-6018

JAN 1998
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EDMC

Mr. Douglas R. Sherwood
Hanford Project Manager
U.S. Environmental Protection Agency
712 Swift Boulevard, Suite 5
Richland, Washington 99352-0539

Dear Messrs. Alexander and Sherwood:

HANFORD FEDERAL FACILITY AGREEMENT AND CONSENT ORDER (TRI-PARTY AGREEMENT)
MILESTONE M-15-00A -- 100 AREA REMAINING SITES DECISION DOCUMENTATION

Enclosed are two copies each of the "Remedy Selection Process for Remaining 100 Area Source Operable Unit Waste Sites," DOE/RL-94-61, Appendix N, Draft A, and the "Proposed Plan for Interim Remedial Actions at the 100 Area Remaining Sites," DOE/RL-97-83, Draft A, for review. This action completes Tri-Party Agreement Milestone M-15-00A for the remaining waste sites in the 100 Area source operable units (OUs [excluding burial grounds and N Area OUs]). These documents were prepared as an outcome of teaming meetings between the U.S. Department of Energy, Richland Operations Office (RL), the State of Washington Department of Ecology (Ecology), and the U.S. Environmental Protection Agency (EPA); held from February 1997 through May 1997.

The remedy selection process for the 100 Area Remaining Sites uses an innovative approach called the plug-in approach. This approach allows multiple, similar, but separate sites at a facility to make use of the same remedy. The standard remedy is applied to sites with similar characteristics. Under this approach, cleanup actions can proceed at candidate sites without re-evaluating the same remedy through the entire Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) process. These documents utilize the Declaration of the Record of Decision for the 100-BC-1, 100-DR-1, and 100-HR-1 OUs as the proposed standard remedy for cleanup of the remaining 100 Area waste sites. These documents outline the process used by the Remaining Sites Team to select this remedy.

The following issues remain outstanding and will be resolved during the review period:

- The remedy selection process is "pending" for several types of waste sites, notably, pipelines and inert landfills.

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- Several 100 Area sites are being reviewed by the cognizant Project Managers for inclusion in these documents in accordance with a draft management guideline (see below).

- Inclusion of waste sites currently under the responsibility of the Decontamination and Decommissioning Project, Spent Nuclear Fuels, and the Site Infrastructure Division need further discussion for presentation in the document.

Additionally, it should be noted that these documents reflect the test case implementation of a draft Tri-Party Agreement Handbook Management Guideline, Maintenance of the Waste Information Data System (WIDS), TPA-MG-08. This draft procedure has been utilized by the Remaining Sites Team (DOE, EPA and Ecology) to update the WIDS data base. To date, agreement has been reached on 104 waste sites in the 100 Area for reclassification and, therefore, are not included in these two documents. These sites have been reclassified to the "rejected" status, indicating that the sites do not contain hazardous substance releases. Until the management guideline is approved, and the next step taken to revise Appendix C of the Tri-Party Agreement, the waste sites listed in these documents and Appendix C will not match. DOE is currently waiting for internal comment resolution by Ecology to proceed with finalizing the management guideline. DOE, DOE contractor, and EPA review of the guideline has been completed.

DOE would like to arrange a meeting in early January 1998 with EPA and Ecology, to review the processes utilized in these documents to foster dialogue and understanding of the plug-in approach. If you have any questions, please call Ms. Nancy A. Werdel at 376-5500.

Sincerely,

Nancy A. Werdel

Nancy A. Werdel, Project Manager
Remedial Actions Project

RAP:NAW

James E. Rasmussen for

George H. Sanders, Administrator
Hanford Tri-Party Agreement

Attachments: As stated

cc w/attachs:
D. A. Faulk, EPA
L. E. Gadbois, EPA
K. K. Holliday, Ecology
P. S. Innis, EPA
R. D. Morrison, FDH
W. W. Soper, Ecology

cc w/o attachs:
S. W. Clark, CHI
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