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JUL 29 1999

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

Mr. E. R. Skinnarland
200 Area Section Manager
Nuclear Waste Program
State of Washington
Department of Ecology
1315 West 4th Avenue
Kennewick, Washington 99336-6018



Dear Messrs. Sherwood and Skinnarland:

RESPONSE TO REGULATORY COMMENTS ON DRAFT A (ATTACHMENT 1) AND
TRANSMITTAL OF DRAFT B (ATTACHMENT 2) OF THE "200-CW-1 OPERABLE UNIT
RI/FS WORK PLAN AND 216-B-3 RCRA TSD UNIT SAMPLING PLAN," DOE/RL-99-07

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Please find attached Draft B of the subject document for your information. Four copies are being provided to the State of Washington Department of Ecology (Ecology), and two copies to the U.S. Environmental Protection Agency (EPA).

Comments received on the review of Draft A from Ecology have been dispositioned and incorporated, where appropriate. A disposition meeting with Ecology was held on June 23, 1999. A copy of the final comment dispositions is attached.

50811

This work plan started public review on July 8, 1999, and it is the first of several to follow the streamlined approach for characterization and remediation of the 200 Areas as described in "200 Areas Remedial Investigation/Feasibility Study Implementation Plan – Environmental Restoration Program," DOE/RL-98-28. The work plan contains the elements of a Comprehensive Environmental Response, Compensation, and Liability Act Remedial Investigation/Feasibility Study work plan and Resource Conservation and Recovery Act Treatment, Storage, and Disposal unit sampling plan. A sampling and analysis plan is included as an appendix to the work plan.

Following the public review period, comments will be incorporated and a Revision 0 prepared for submittal to EPA and Ecology.

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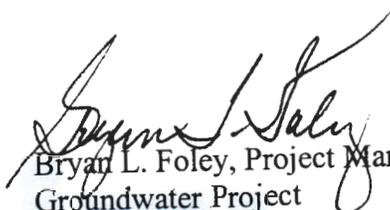
Messrs. Sherwood and Skinnarland

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JUL 29 1999

If you want to discuss this matter further or require additional information, please contact me at 376-7087.

Sincerely,


Bryan L. Foley, Project Manager
Groundwater Project

GWP:BLF

Attachments: As stated

cc w/attachs:
L. C. Treichel, EM-442

cc w/o attachs:
R. Boutin, BHI
J. W. Donnelly, Ecology
M. E. Todd, CHI
C. D. Wittreich, CHI

**Final Comment Resolutions for Official Ecology Comments on DOE/RL-99-07
Draft A 200-CW-1 Work Plan and 216-B-3 RCRA TSD Unit Sampling Plan**

General Comments

1. The entire document lacks standard terminology for authorizing RCRA TSD closure actions and the decision mechanism. A thorough search needs to occur to establish a unified approach for implementing the RCRA TSD closure as well as the CERCLA process. Most sections concentrate only on the CERCLA decision process rather than a combination of RCRA and CERCLA. Ecology is disappointed that after the development of the *200 Area Implementation Plan* and the flow-charts that we must make this point in the work plan.

Response: Comment accepted. The document was reviewed for RCRA TSD closure terminology in accordance with the specific comments below and the Implementation Plan.

2. The work plan references a closure plan (i.e. 200-BP-11) and other documents (i.e. Aggregate Management Studies) which have not been approved. They are effectively moot documents that focus on past actions/failures, and provide no decision-making matrix or a path forward for the future investigations and eventual cleanup of these waste sites and TSD units. Use appropriate information from these documents in this work plan relative to the waste sites and TSD unit and delete the references. Furthermore, Sections 2 and 3 of a Closure Plan are not readily apparent in this work plan as described in the *200 Area Implementation Plan*. This work plan must solely include the "Facility Description and Location Information" and "Process Information" sections of a Closure Plan and can not be referenced.

Response: Comment accepted. The last sentence of paragraph 2, Section 2.2 was removed. The following sentence was added just before Section 2.1:

"Certain subsections of this section contain information that will be used for portions of the RCRA TSD closure plan. These are as follows:

- *Section 2.1, "Physical Setting" provides closure plan facility description and location*
- *Section 2.2, "Waste Description and History" provides closure plan facility description and location and process information"*

The following sentence was added just before Section 3.1:

"Certain subsections of this section contain information that will be used for portions of the RCRA TSD closure plan. These are as follows:

- *Section 3.1, "Known and Suspected Contamination" provides closure plan facility description*

- *Section 3.3, "Nature and Extent of Contamination" provides closure plan facility description and groundwater monitoring"*

3. Milestone 20 is entirely omitted from the document. This milestone describes the overall requirement for all closure plan submittals. This further amplifies the lack of RCRA terminology to foster good communication and integration.

Response: Comment accepted. See response to Specific Comment #3.

4. Discussing preliminary remedial alternatives in a work plan is useful information but Ecology must have a statement in the work plan that these will be further developed and agreed to in the Focused Feasibility Study, Proposed Plan, and eventual Record of Decision and Permit Modification. Approval of this work plan DOES NOT constitute approval of the listed alternatives as described. Include language in the beginning of the work plan to explain this aspect or delete all language regarding the alternative analysis.

Response: Comment accepted. The following text was added to Section 1.1 at the end of the first paragraph:

"Remedial alternatives may be applied at any or all of the waste sites in an OU and different alternatives may be applied to different waste sites depending on site characteristics. These preliminary remedial alternatives will be further developed and agreed to in the feasibility study/closure plan, in the proposed plan/proposed permit modification, and the eventual record of decision (ROD) and Hanford Facility RCRA Permit Modification for this OU."

5. Ecology WILL NOT use the approval of the work plan to constitute as a contained-in-determination for hydrazine. Ecology accepts the work plan for identifying this as a need and the determination will be through alternate correspondence and will not hold up the investigation schedule.

Response: Comment accepted. Text in Section 3.3.2.4 was modified per Specific Comment #19.

6. The Project Schedule is not adequate to approve the work plan. An enforceable schedule with proposed milestones for the start of investigative work, RI report, FS report, Closure Plan, and Proposed Plan must be included. The work plan must state the USDOE shall submit a Tri-Party Agreement (TPA) Class II change request to Ecology for approval.

Response: Comment accepted. Proposed TPA Milestones were added for 1) completion of field work; 2) Draft RI Report; 3) Draft FS/Closure Plan; and 4) Draft Proposed Plan/Proposed Permit Modification. A sentence was added concerning the TPA change request.

7. Appendix A, the Sampling and Analysis Plan contains columns in Table A2-1 under the "Preliminary Action Levels" for radionuclides that are inappropriate at this time and will require further development. Delete the "Indus, Cons, CI/Close" terms.

Response: Comment accepted. The table was modified to reflect MTCA B and MTCA C for the chemical constituents and just Preliminary Action Levels for radionuclides.

8. The document needs extensive work in critical areas prior to public review. The document generally follows the Implementation Plan but does not flow well. Ecology wishes to resolve the comments as soon possible. Ecology is willing to allow field investigative work to proceed in parallel with public review to take advantage of available funding and scheduling should that be necessary.

Response: DOE-RL will begin field efforts no later than August 11, 1999, which means the field effort may run concurrently with the public review. DOE-RL acknowledges the potential for additional field effort based on public comments.

Specific Comments

1. Page 1-1, 1st paragraph: Explain that this operable unit consists of 28 waste sites that includes 4 TSD units, and 24 RPP waste sites and that different regulatory pathways exists but through integration efforts this work plan will streamline the process and will satisfy the requirements of the various regulations.

Response: Comment accepted in part. The text was modified as follows:

"This OU consists of 28 waste sites, including 26 Resource Conservation and Recovery Act of 1976 (RCRA) past-practice (RPP) sites and two RCRA treatment, storage, and disposal (TSD) sites in a single RCRA TSD unit. These sites, mostly trenches and ponds, received predominantly cooling water from various facilities in the 200 East Area, such as the Plutonium/Uranium Extraction (PUREX) Plant, B Plant, the 204-AR Vault, the 241-A-401 Building, the 242-A Evaporator, the 242-B Evaporator, the 244-AR Vault, the 244-BXR Vault, the 244-CR Vault, the 241-BY Tank Farm, the 241-A Aging Waste Ventilation System Complex, the 284-E Powerhouse, and the 283-E Water Treatment Plant. This cooling water carried some chemicals and radionuclides, which contaminated some of the waste sites. Several unplanned releases of radioactive material, including releases associated with equipment failures in the facilities, contributed large amounts of radioactivity to several of the waste sites. Integration of the RPP and RCRA TSD sites in this work plan will streamline the characterization and remediation of the waste sites while satisfying the requirements of the various regulations governing the sites."

2. Page 1-1, 1st paragraph: The introduction should describe the facilities that generated the cooling water. Also, clarify that the unplanned releases can include the failure of equipment in the facilities leading to unplanned releases of

radioactive materials to the trenches, ditches, and ponds. Unplanned releases historically have included minor spills outside of facilities that have little or nothing to do with the facility. Please provide the clarification.

Response: Comment accepted. A list of facilities was included. See response to Specific Comment #1.

3. Page 1-1, 3rd paragraph: Include a discussion on the M-20 milestone and the proposed milestones stated in the general comments.

Response: Comment accepted. The following text was added at the end of the paragraph:

"Milestone M-20-00, "Submit Part B Permit Applications or Closure/Postclosure Plans for All RCRA TSD Units," requires permit applications, closure, and post-closure plans to be submitted to the Washington State Department of Ecology (Ecology) for approval by February 28, 2004."

4. Page 1-1, Section 1.1, 1st paragraph: Add language to include options for remedial actions that may only address some waste sites in the Operable Unit rather than every waste site in the Operable Unit. Records of Decision may include multiple waste groups. Additionally, add language to address general comment number 4.

Response: Comment accepted. See response to General Comment #4.

5. Page 1-1, Section 1.1, 2nd paragraph, last sentence: Add waste management to the text.

Response: Comment accepted.

6. Page 1-1, Section 1.1, 3rd paragraph: No RCRA language exists for the Closure Plan and Permit Modification. Add necessary text. See general comment 1.

Response: The following text was added:

"After characterization data have been collected, results will be presented in a group-specific remedial investigation (RI) report that includes the specific RCRA TSD unit characterization. The RI report will support the evaluation of remedial alternatives and closure options that will be included in the group-specific FS and specific RCRA TSD unit closure plan. The FS and closure plan will ultimately support a group-specific proposed plan leading to a ROD and a proposed RCRA permit modification leading to a modification of the Hanford Facility RCRA Permit for the RCRA TSD unit."

7. Page 1-3, Figure 1-1: Public involvement (PI) requirements for the RCRA closure plan need modification. The first block indicates that chapters 2, 3, 4, and 5 of the Closure Plan will be included in the RI/FS work plan. The third block indicates that chapters 6, 7, and 8 will be addressed in the FS/Closure Plan. The

FS/Closure Plan is one of the documents to be available through the administrative record for public review. The problem with dividing the chapters between the work plan and the FS/Closure Plan is that not all closure chapters will be subjected to public review.

Response: Comment accepted. All sections of the Closure Plan will be available during the public review period.

8. Page 2-4, Section 2.2, 1st paragraph: Add the TPA to the first sentence.

Response: Comment accepted.

9. Page 2-4, Section 2.2, 1st paragraph, last sentence: Table 2-1 has 24 RPP sites. Change the "Twenty-six" to "Twenty-four."

Response: Comment accepted in part. Table 2-1 was modified to reflect 216-B-3-3 as a TSD and 216-B-3A, B, and C as RPP sites. A footnote was added to the table explaining that these last three were former RCRA TSD units that have been clean-closed under RCRA and that they are currently included in the Tri-Party Agreement as RPP sites. This results in 26 RPP sites and 2 RCRA sites included in a single RCRA TSD Unit.

10. Page 2-4, Section 2.2, 2nd paragraph: The detailed description of the facilities and processes must be in this work plan and not referenced. These portions fulfill Sections 2 and 3 of a Closure Plan as stated in Figure 1-1. Also see general comment 2.

Response: Comment accepted. See response to General Comment #2.

11. Page 2-5, Section 2.2, 4th paragraph: The number of RPP sites and TSD units does not match Table 2-1.

*Response: Comment accepted. The paragraph was modified as follows:
"Twenty-six of the sites in this group are RPP sites, including three former RCRA TSD units that have been successfully clean closed and seven unplanned release sites that are physically associated with one or more waste sites in the cooling water group. Two of the sites in the group are RCRA TSD sites comprising a single RCRA TSD unit. None of the waste sites in this group are currently receiving effluent."*

12. Page 2-5, Section 2.2, 5th paragraph, last sentence: Change to a positive statement that the integration allows for addressing all contaminants, including radiological, and that the original Closure Plan did not consider radiological contaminants, and was not required to be based on RCRA.

*Response: Comment accepted. The last sentence was replaced with the following:
"The integration of these sites into this work plan will allow for addressing all
contaminants, including radiological contaminants."*

13. Page 2-6, Section 2.2.2, 2nd paragraph, 2nd sentence: Change "may be" to "will be."

Response: Comment accepted.

14. Page 2-7, Section 2.2.2, 4th paragraph: Change to state that the analogous approach is applied to RPP sites only, not the representative site approach.

Response: Comment accepted.

15. Page 2-7, Section 2.2.2.1: Include the borehole data from 1998 in this section since the section is describing the waste site descriptions and history.

Response: Comment accepted. This information is included in Section 3.3.1.1 of the work plan.

16. Page 2-9, 1st paragraph: Delete the sentence "A draft closure plan for ... 1990)."

Response: Comment accepted.

17. Page 2-9, 2nd paragraph: Clarify this paragraph to ensure that the 200-BP-11 Closure Plan is no longer applicable and that a new Closure Plan and integration with 200-CW-1 is the regulatory path forward. As written it leads one to believe that another Closure Plan exists and will be implemented.

*Response: Comment accepted. The following text was added to the paragraph:
"Subsequent to the decision to integrate RCRA closure of the 216-B-3 Pond and
216-B-3-3 Ditch with the 200-BP-11 OU, the strategy changed and OUs were
reevaluated. The current path forward for these RCRA TSD sites is integration
with the 200-CW-1 OU as defined in the Implementation Plan."*

18. Page 2-26 to 2-29, Table 2-1: Table is incomplete and should include the Source Facility for each waste site.

Response: Comment accepted. The Source Facility (or Facilities) were added for each waste site.

19. Page 3-8, 2nd paragraph, last sentence: Delete sentence; see general comment 5.

*Response: Comment accepted in part. The last two sentences were modified as follows:
"For these reasons, a contained-in determination for U133 hydrazine in soil and debris at the B-Pond and 216-B-3-3 Ditch will be requested from Ecology and the EPA under separate documentation."*

20. Page 3-10, Section 3.3.3.4: Include the current monitoring wells (network), well numbers, monitoring frequency, and mode of monitoring as stated in the most recent ICN.

Response: Comment accepted. The following text was added to the end of Section 3.3.3.4:

"In January 1998, the Interim Status Groundwater Monitoring Plan network for the 216-B-3 Pond was reduced to nine wells per the Interim Change Notice (ICN) (WHC 1995). This ICN also reduced the frequency of sampling from quarterly to semi-annually and the constituent list to contaminant indicator parameters (detection level) only. The nine wells that make up the network are 299-E32-4 (upgradient), 299-E26-11, 699-40-36, 699-40-40A, 699-41-42, 699-42-37, 699-43-43, 699-43-45, and 699-44-39B. Figure 3-8 shows the current monitoring network."

21. Page 3-10, Section 3.3.3.5: Add a conclusion statement whether B-3 pond did or did not contribute to the groundwater contamination. If so, then clearly identify which contaminants.

Response: Comment noted. The document currently states the contaminants attributable to the B-3 Pond based on available data.

22. Page 5-1 – 5-2, Section 5.1: The integration process is missing all RCRA language regarding the Closure Plan and Permit Modification. See general comment 1.

Response: Comment accepted. The following text was added to the beginning of the section:

"RCRA closure and corrective action authorities have clear jurisdiction over waste with chemical constituents (in particular, dangerous waste and dangerous constituents) and "mixed wastes" (mixtures of dangerous waste and radiological contaminants), but not over waste with radiological contaminants only. By applying CERCLA authority concurrently with RCRA closure and corrective action requirements through integration, cleanup will be addressing all regulatory and environmental obligations at this OU as effectively and efficiently as possible. Also, by applying CERCLA authority jointly with that of RCRA, additional options for disposal of closure, corrective action, and remedial action wastes at the ERDF are possible. By allowing flexibility in final disposal options, the three agencies intend to minimize disposal costs as much as possible while remaining fully protective of human health and the environment."

23. Page 5-2, 1st paragraph: This paragraph lists the closure chapters (i.e. chapters 1-4) that will be provided within this work plan. This contradicts Figure 1-1, which indicates chapters 2-5.

Response: Comment accepted in part; the numbering in this paragraph was not meant to correspond to chapters. However, for clarity, the numbers were removed and references to specific sections where the information is located in the document were provided.

24. Page 5-2, Section 5.1, 2nd paragraph: This paragraph discusses satisfying the requirements for a CMS report. Please add clarifying language.

Response: Comment accepted. The text was modified as follows:

“The integration process for the evaluation of remedial alternatives includes the preparation of an FS/closure plan that will satisfy the requirements for a CMS report and RCRA TSD unit closure plans. Both documents are required to include identification and development of corrective measure/remedial alternatives and an evaluation of those alternatives. The CMS generally also includes a recommended alternative, which is typically the purpose of the proposed plan under CERCLA.”

25. Page 5-2, Section 5.1, 1st paragraph: Ecology was unable to clearly identify within this work plan where the facility description and information as well as the process information are contained. Throughout the document there were statements showing that this section will serve for the Closure Plan. See general comment 2.

Response: Comment accepted. References to specific sections containing the facility and process descriptions were added to aid readers in locating the specific information. See response to Specific Comment #23.

26. Page 5-2, Section 5.1, 3rd paragraph: This paragraph is incorrect. A ROD will not be used to authorize a TSD Closure. The Closure Plan and Permit Modification accomplish this. The ROD allows for more economical disposal, addressing all contaminants, and for scheduling/planning (i.e., milestones).

Response: Comment accepted. The text was changed as follows:

“The decision-making process for the 200-CW-1 OU will be based on the use of a proposed plan, ROD, and Hanford Facility RCRA Permit modification. Based on the FS/closure plan, a proposed plan will be prepared that identifies the preferred remedial alternative for waste sites within the OU. The proposed plan will include a draft permit modification with unit-specific permit conditions for RPP waste sites and the RCRA TSD unit within the OU for incorporation into the Hanford Facility RCRA Permit. The CERCLA ROD will document the RCRA TSD closure and RCRA corrective action decisions for these units. The lead regulatory agency (Ecology) will prepare the CERCLA ROD following completion of the public involvement process for the proposed plan, which, after

signature by the Tri-Parties, will authorize the selected remedial action. The remedy selected under CERCLA will be incorporated into the Hanford Facility RCRA Permit as the RCRA closure/corrective action after issuance of the public notice and comment process.

The technical and procedural elements of RCRA and CERCLA are each addressed in full in this process. The CERCLA public involvement, including public notice and opportunity to comment, will be enhanced, as necessary, to concurrently satisfy the public involvement requirements for the RCRA closure and RCRA past-practice processes. The public will be given an opportunity to review and comment on the CMS, closure plans, which are appended to the CMS, and the proposed permit conditions that will be contained in the proposed plan. The proposed plan with a draft permit modification will be issued for a minimum 45-day public review and comment period. Supporting documents, including the FS/closure plan, will also be made available to the public for review at this time. A combined public meeting/public hearing may be held during the comment period to provide information on the proposed action and permit modification and to solicit public comment.”

The last two sentences of paragraph three and paragraph four were deleted.

27. Page 5-6, Section 5.2.5.3: This section needs more discussion relative to whether quantitative risk assessments may be useful and why. Earlier 100 Area qualitative risk assessments (QRAs) needed much improvement, and the 200 Area QRAs should learn from past actions. This should be discussed further.

Response: Comment accepted in part. The application of risk assessment in the characterization and remediation of the 200 Areas is discussed in detail in the Implementation Plan. The following text was added to direct readers to the information:

“The application of risk assessment in the characterization and remediation of the 200 Areas will follow a graded approach as described in Section 5.5 of the Implementation Plan. A QRA will be performed as part of the RI report and FS. Once additional data are available for all the sites in an OU, a more quantitative risk assessment may be performed. A quantitative, cumulative risk assessment will be used to evaluate remedial actions and close out the sites in the 200 Areas.

For the 200-CW-1 OU, a QRA will be prepared.....”

28. Page 5-6, Section 5.3: Closure performance standards are determined in the Closure Plan and Permit Modification. It is critical to identify the performance standards as early as possible. This could happen at various stages, and not just at the feasibility stage. Modify the text to allow more flexibility in the timing for developing closure performance standards.

Response: Comment accepted. The text was modified as follows:

"After the RI is complete, remedial alternatives/closure strategies will be developed and evaluated against performance standards and evaluation criteria in the FS and appended RCRA TSD unit closure plans. The FS process consists of several steps:

1. Defining remedial action objectives (RAOs) and RCRA closure and RCRA corrective action performance standards"

29. Page 5-7, Section 5.3, number 6: The remedial action alternatives do not address RCRA Closure terminology such as landfill, modified closure, clean closure and a description of those terms. Include a discussion on these items. See general comment 4.

Response: Comment accepted. Number 6 was modified as follows:

"Evaluating alternatives and presenting information needed to support remedy selection and RCRA closure of the unit as a landfill or under modified or clean closure pursuant to RCRA Hanford Facility Permit Condition II.K."

The following paragraph was added to Section 5.1 prior to the third paragraph:

"RCRA closure options (landfill, modified, and clean closure as defined in Condition II.K. of the RCRA Hanford Facility Permit) will be determined based upon the alternative selected and the amount of cleanup that can be attained by the alternative. Landfill closure under RCRA will include the construction of an engineered barrier over the unit and equates to a containment alternative under CERCLA. A modified closure option includes alternatives that leave contaminants in place above MTCA Method B cleanup standards in soil, debris, or groundwater. A clean closure option requires that all contaminated material and media be removed and decontaminated to levels below MTCA Method B."

30. Page 5-7, number 6: Explain the origin of the criteria, and provide an explanation of the NEPA values.

Response: Comment accepted. References to the NCP and the EPA RI/FS guidance were added to the list of criteria. NEPA was removed from the list and the following text was added after the discussion of community acceptance:

"National Environmental Policy Act of 1969 (NEPA) values will also be evaluated as part of DOE's responsibility under this authority. NEPA values include impacts to natural, cultural, and historical resources; socioeconomic aspects; and irreversible and irretrievable commitments of resources.

RCRA closure performance standards (WAC 173-303-610[2]) will also be used to evaluate the ability of alternatives to comply with RCRA closure requirements. These standards require the closure of TSD units in a manner that:

- Minimizes the need for further maintenance*

- *Controls, minimizes, or eliminates, to the extent necessary to protect human health and the environment, post-closure escape of dangerous waste, dangerous waste constituents, leachate, contaminated run-off, or dangerous waste decomposition products to the ground, surface water, groundwater, or the atmosphere*
- *Returns the land to the appearance and use of surrounding land areas to the degree possible given the nature of the previous dangerous waste activity.*

In addition, RCRA corrective action performance standards (WAC 173-303-646[2]) will be used to evaluate alternative compliance with RCRA corrective action requirements. These standards state that corrective action must:

- *Protect human health and the environment for all releases of dangerous wastes and dangerous constituents, including releases from all solid waste management units at the facility*
- *Occur regardless of the time at which waste was managed at the facility or placed in such units and regardless of whether such facilities or unit were intended for the management of solid or dangerous waste*
- *Be implemented by the owner/operator beyond the facility boundary, where necessary to protect human health and the environment."*

31. Page 5-8, Section 5.4, 1st paragraph: This paragraph is incorrect. A ROD will not be used to authorize a TSD Closure. The Closure Plan and Permit Modification accomplish this. The ROD allows for more economical disposal, addressing all contaminants, and for scheduling/planning. See general comment 1.

Response: Comment accepted. The text was modified as follows:

"The decision-making process for the 200-CW-1 OU will be based on the use of a proposed plan, ROD, and modification to the RCRA Hanford Facility Permit. Following the completion of the FS/closure plan, a proposed plan will be prepared that identifies the preferred remedial alternative for the OU (which will include RCRA closure and corrective action requirements)."

32. Page 5-9, Section 5.5, 1st paragraph: This paragraph is incorrect. A ROD will not be used to authorize a TSD Closure. The Closure Plan and Permit Modification accomplish this. The ROD allows for more economical disposal, addressing all contaminants, and for scheduling/planning. See general comment 1.

Response: Comment accepted. The text was modified as follows:

"After the ROD and modification to the RCRA Hanford Facility Permit have been issued, a remedial design report (RDR) and remedial action work plan (RAWP)

will be prepared to detail the scope of the remedial action (which will include RCRA closure and corrective action requirements)."

33. Page 5-9, Section 5.5, 2nd paragraph: The integration process is missing all RCRA language regarding the Closure Plan and Permit Modification. See general comment 1.

Response: Comment accepted. See responses to Specific Comment #34.

34. Page 5-9, Section 5.5, 2nd paragraph, last sentence: Delete this sentence. Closeout activities will be specified in the ROD and RD/RA work plan and Permit conditions, not as identified in the *200 Area Implementation Plan*.

Response: Comment accepted. The text was modified as follows:

"Following the completion of the remediation effort, closeout activities will be performed as specified in the ROD, RD/RAWP, and the Permit.

RCRA closure activities and schedules will be defined in the closure plan and will be consistent with those identified in the RDR/RAWP. Enforceable sections of the closure plan will be stated in the modification to the RCRA Hanford Facility Permit. Certification of closure in accordance with WAC 173-303-610(6) will be performed after completion of cleanup actions. The site will be restored as appropriate for future land use. If clean closure is not attained at a TSD unit, postclosure care requirements will be met. These will include final status groundwater monitoring, maintenance and monitoring of institutional controls and/or surface barriers, and certification of postclosure at the completion of the postclosure period."

35. Page 6-1, 1st paragraph: The integration process is missing all RCRA language regarding the Closure Plan and Permit Modification. See general comment 1.

Response: Comment accepted.

36. Page 6-1, 2nd paragraph: See general comment 6 and add text to submit a change request.

Response: Comment accepted.

37. Appendix A: The organic methods may create data on contaminants not listed on the Contaminant of Concern (COC) list. Add text to show how this information will be handled and how new COCs will be dealt with.

Response: Comment accepted. The following text was added at the end of Section A1.4:
"If contaminants not identified as COPCs are detected during laboratory analysis, the data will be evaluated against existing regulatory standards or risk-

based levels if exposure data are available and existing process knowledge to determine the need for remedial action."

38. Page A1-2, 3rd paragraph, Appendix A: Any past data generated from building a road across this ditch should be included and results discussed.

Response: Comment accepted. A brief summary of the characterization at the 216-A-29 ditch was included.

39. Page A2-9, Appendix A: Since this is a TSD, Land Disposal Restriction (LDR) action levels should also be looked at. Further discussions are necessary on the RESRAD look up values for radionuclides and what levels will be used.

Response: Comment accepted. See response to General Comment #7. The following footnote was added to the end of Table A2-1:

"Dangerous waste generation is not expected at this OU (a contained-in determination is expected for listed waste hydrazine). If generated, the concentrations of any underlying hazardous constituents will be evaluated against applicable regulatory requirements."

Footnote "j" was modified as follows:

"There are no preliminary action levels for radionuclides at this time. They will be developed in the remedial investigation/feasibility study process."

40. Page B-2, Waste Control Plan, Non-regulated Material Disposal Location(s): Liquid disposal language needs to be adjusted to reflect the options specified in the revised Investigative Derived Waste (IDW) strategy.

Response: Comment accepted.

41. Appendix C: A more recent revision of Part A, Form 3 for the 216-B-3 Pond exists and should be included (Revision 6). Additionally, the figure on page 6 of 7 shows the TSD boundary. The boundary map does not show the entire footprint. Although there is a legend note indicating where the boundary extends, it is unclear whether the concrete structure is part of the TSD boundary or if the boundary stops at the concrete structure. Provide a complete map with the boundaries.

Response: Comment noted. Based on our current information, Revision 5 is the most current version. This figure is a copy of the actual figure from the permit. Ecology will pursue a revision to the figure in Part A, Form 3 for the 216-B-3 Pond through DOE-RL EAP.

Administrative Comments

1. Page 1-1, 1st paragraph, 3rd sentence: Delete the word "also."

2. Page 1-2, Section 1.2: Move entire section to after the introduction.
3. Page 2-10, Section 2.3: Move entire section to Section 2.2.1.

Response: Comments accepted.