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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
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November 29, 1993

Mr. John L. Erickson, Head
Environmental Radiation Section
Division of Radiation Protection
State of Washington Department of Health
Airdustrial Center, Bldg. 5
P.O. Box 47827
Olympia, WA 98504-7827

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Dear Mr. Erickson:

The Washington State Department of Ecology (Ecology) is pleased to receive your comments on the RCRA Facility Investigation/Corrective Measures Study Work Plan for the 200-UP-2 Operable Unit, Hanford Site, Richland, Washington (Work Plan). We appreciate your willingness to be involved with this review process and to work with us to achieve site cleanup. As you are aware, the Department Health (DOH) and Ecology are striving to have a working relationship on the development of radioactive contaminant standards. Your comments and questions are addressed in this letter. 28870

The Work Plan was designed and written to reference published, supporting documents. As appropriate, documents (e.g., the Quality Assurance Project Plan) are included with the Work Plan for the reader to reference. Other documents, such as the Aggregate Area Management Study Report are available to you at your request from WHC, Environmental Restoration Program Information Center.

Task 1 - Project Management
DOH may request any summary meeting notes or progress reports provided at the monthly TPA 200-UP-2 Unit Manager's meeting. However, the information in these records is expected to be general.

We will be happy to coordinate split sampling with DOH on selected sites of the 200-UP-2 Operable Unit.

DOH personnel will be notified in advance of any public meetings.

Task 2 - Source Characterization
Radiological contaminants have been identified by DOE personnel, as supported by their contractor. Final verification on these contaminants will be conducted by the regulators. We look forward to working collaboratively with DOH personnel in analyzing the results during the public comment periods for the LFI Report of this investigations.

The soil samples shall be collected in a manner that ensures they are representative of the highest concentrations at each waste management unit. Field screening will be used to determine the highest concentrations.

The action level is twice background and is based on 95% confidence that anthropogenic species are identified. An increase above the action levels triggers increased sampling.

Task 3 - Geologic Investigation
Quarterly summaries of the Geologic Investigations can be forwarded to you. The first report should be available three months after the Work Plan has been approved and sampling completed.

Task 4 - Surface Water Sediment Investigation
Surface water sampling will be limited to the 207-U Retention Basin. Since the basin is currently active, no investigation will be conducted until the activity ceases in June 1995.

Task 5 - Vadose Zone Investigation
DOH personnel were present for sampling at the 216-U Pond test pit. Their results will be used to supply an independent verification. Fugitive emission controls for this excavation were detailed in the Hanford Radiological Work Permit and Hazardous Waste Operations Plan. Dust was continuously managed by water spray and evaluated by wind speed and direction. Stop-work direction was authorized to the Health Physics personnel and Site Safety Officer at the test pit.

A casing will be used in the drill holes to minimize slough in the borehole and limit transport of gross contamination within the zones. Drilling will stop at the caliche layer if perched water is reported.

The types of field instruments for measurement of radioactivity will be detailed in the Hanford Radiological Work Permit prepared for each activity.

Task 6 - Air Investigation
Ecology personnel expect DOH personnel to be active in implementing the air emissions regulatory program. Permits for activities at this operable unit will be discussed through the interactive meetings between DOH and the WHC Regulatory Compliance Group.

Air pathways by which a Hanford Site worker could potentially be exposed to contamination at the waste management units were evaluated. This was considered the most conservative route vs. the general public in the city of Richland.

Tasks 7, 8, 9 and 10
Data Evaluation
Qualitative Risk Assessment
Identifications of Potential Contaminant-and Location-Specific ARARS
LFI Report

It is expected that DOH's participation will be integral in establishing the radioactive contaminant standards through MTCA.

Ecology appreciates your response on the 200 UP-2 Work Plan, If you have any questions, please feel free to call me at (509) 736-3014.

Sincerely,

Nancy Uziemblo

Nancy Uziemblo
Unit Manager
Nuclear and Mixed Waste Management Program

NU:mf

cc: Dave Einan, EPA
Paul Pak, DOE
Administrative Record (200-UP-2)

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Subject: RCRA FACILITY INVESTIGATION/CORRECTIVE MEASURES STUDY WORK PLAN FOR THE 200-UP-2 OPERABLE UNIT, HANFORD SITE, RICHLAND, WASHINGTON

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