



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
REGION 10 HANFORD PROJECT OFFICE  
712 SWIFT BOULEVARD, SUITE 5  
RICHLAND, WASHINGTON 99352

0049822

062062

September 18, 1998



Bryan L. Foley  
U.S. Department of Energy  
Richland Operations Office  
P.O. Box 550, H0-12  
Richland, Washington 99352

**RECEIVED**  
**SEP 22 1998**  
**DOE-RL / DIS**

Re: 200 Area Implementation Plan, Draft A Comments

Dear Mr. Foley:

49646

The U.S. Environmental Protection Agency (EPA) has reviewed Draft A of the 200 Area Implementation Plan. The Department of Energy (DOE) and the regulators have already made considerable efforts in scoping and reviewing earlier work products for this Plan. Overall, with minor modifications, we believe the Plan is ready to go out for public comment.

The general concerns that I do have are the costs for developing the Implementation Plan and the future costs for writing the Group Specific Work Plans. I'm hoping that the time and money we've all invested in the Implementation Plan will result in more streamlined and less-expensive Group Specific Work Plans. Below are EPA's comments on Draft A of the 200 Area Implementation Plan.

1. It appears that Cliff Clark's concerns on the use of the phrase "hazardous constituents" has been resolved. The phrase is pertinent to the 23 waste site groups and it's cited in statutory language for RCRA corrective action under 3004(u) and 3008(h).
2. Section 2.5.2 Contingent Remedy and 2.5.3 Plug-In Approach

EPA does not disagree with having the option of using the contingent remedy or plug-in approach. However, EPA needs to keep the option of whether these approaches would require a new ROD, a ROD Amendment, or an Explanation of Significant Difference. EPA doesn't want the implementation plan's language to be perceived as limiting EPA's ROD options. Therefore, in each of the above two sections there should be a standard sentence qualifying that "use of these approaches may require a new ROD, amended ROD, and/or an Explanation of Significant Difference."

3. Section 5.5.1 Risk Assessment Approach, First Paragraph, last sentence

"a confirmatory sampling effort will be performed" - please add immediately following this phrase "as part of the remedial action"

4. Section 5.5.3 Sequence of Risk Assessment Activities, Second Bullet

Is there a typo in "FY01"? If not, should this be the first bullet. The current first bullet has FY03 as a date.

If you have any questions regarding these comments please call me a 376-6623.

Sincerely,

A handwritten signature in black ink that reads "Tom C. Post". The signature is written in a cursive style with a large, sweeping initial "T".

Tom C. Post  
Remedial Project Manager

cc: Jack Donnelly, Ecology