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DEPARTMENT OF ECOLOGY

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February 27, 1992

Mr. James Goodenough
USDOE--Richland Operations Office
P.O. Box 550
Richland, WA 99352



Re: 100 Area Work Plans; Section 3.3

Dear Mr. Goodenough:

This letter addresses the "redline" Draft B version of the 100 Area Work Plans generic Section 3.3 text, and the disposition of Ecology comments on this section as discussed in a conference call on January 30 between representatives of USDOE, WHC, Ecology and Golder Associates. Because this section is nearly identical in all rescoped work plans currently undergoing review, it is critical we are in agreement as to purpose, scope and content.

As you know, the purpose of this section has evolved in subsequent work plan drafts. It is apparent that through various discussions and re-writes of this section, the current text is a pastiche of goals and objectives that is now confusing and potentially misleading. For example, the first paragraph addresses 1) the conceptual model, 2) identification of potential ISE situations, 3) priority sources of contamination and 4) focusing data collection.

Section 3.3 describes a "preliminary qualitative assessment of the impact of known contaminants on human health and the environment." Although this "assessment" looks like a reference to the qualitative risk assessment suggested by the *Hanford Site Past Practice Investigation Strategy*, the USDOE response to our work plan Comment #60 stated "there is no relationship between the Hanford Site Baseline Risk Assessment Methodology and Section 3.3." This disassociation from the *Methodology* removed many of our concerns about the improper application of risk assessment guidance. Yet, a quasi-risk assessment procedure still permeates the section.

The objectives of the preliminary qualitative assessment stated in Section 3.3 "are to identify any imminent and substantial endangerments that need to be remediated through expedited response actions (ERAs)," and to identify Interim Response Measures (IRMs) and Limited Field Investigations (LFIs). We believe this text 1) misinterprets the concept of ISE (imminent and substantial endangerment), 2) misrepresents the selection criteria for ERAs, and 3) contradicts the actual rescoping process by which ERAs, IRMs, and LFIs were identified.



9201736

Sections 3.3.2, 3.3.3, and 3.3.4 do not serve to better define the field work, and may lead to unnecessary effort and delay. The criteria and concepts in these sections were not used during rescoping in the selection of ERAs and IRMs, and they are not being used currently in the selection of ERA candidates.

Although the stated purpose of Section 3.3.1 is said to present the conceptual model, subsequent text, e.g., Section 3.3.2, Contaminant Characteristics, has no apparent purpose. The focus on contaminant characteristics at this point in the work plan is misplaced. While contaminant characteristics may be an aspect of a conceptual model, the purpose of selecting contaminants of interest is not. In accordance with RI/FS Guidance, EPA 540 G-89-004, (pgs 2-7), "the conceptual model should include known and suspected sources of contamination, types of contaminants and affected media, known and suspected routes of migration, and known or potential human and environmental receptors".

Ecology recommends that Section 3.3 be revised as follows:

- * Re-write this section to satisfy the purpose of section 2.2.2.2 of the 1988 RI/FS guidance document (EPA 540 G-89-004). The section should simply describe the conceptual model.
- * Sections 3.3.2, 3.3.3, 3.3.4 should be removed entirely, but relevant generic text such as that found in the first paragraph of Section 3.3.2 should be put in Section 3.1.
- * Remove all mention of Imminent and Substantial Endangerment. For example, delete the fourth sentence in Section 3.3, and simply state the following, which is adapted from page 2 of the interim final RCRA *Corrective Action Interim Measures*, OSWER Dir. 9902.4:

"In deciding whether an ERA is appropriate, both technical engineering judgement and an evaluation of potential threat to human health and the environment were considered. The decision whether to conduct an ERA will be based on the immediacy and magnitude of the potential threat to human health and the environment, the nature of appropriate corrective action, and the implications of deferring the corrective action until the RFI/CMS study is completed."

- * Maintain the distinction between the conceptual model and the *Strategy* pathway selection process. The latter is not the purpose of the former.

Finally, Sections 3.3.3 and 3.3.5 both reference the preliminary list of contaminants of interest, Table 3-21. This list directly contradicts the last sentence in Section 3.3.2.4, "Contaminants with evidence of environmental occurrence are retained as contaminants of interest." We wholeheartedly agree

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James Goodenough
February 27, 1992
Page 3

with this statement, and note it is consistent with basic TCL and TAL analysis requirements as called for in these work plans. To emphasize a selected list of contaminants of concern at this juncture appears to serve no useful purpose.

Thank you for the opportunity to work together in these matters. Please address questions on this matter to Mr. Steve Cross at (206) 459-6675.

Sincerely,



Larry Goldstein
CERCLA Unit Supervisor
Nuclear and Mixed Waste Management Program

cc. Dave Jansen, Ecology
Paul Day, EPA
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