



Department of Energy
Richland Operations Office
P.O. Box 550
Richland, Washington 99352

0056047

02-RCA-112

DEC 26 2001

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

RECEIVED
JAN 02 2002

EDMC

Dear Mr. Sherwood:

TRANSMITTAL OF THE 200-PW-1 PLUTONIUM/ORGANIC-RICH PROCESS
CONDENSATE/PROCESS WASTE GROUP OPERABLE UNIT REMEDIAL
INVESTIGATION (RI)/FEASIBILITY STUDY (FS) WORK PLAN, DOE/RL-2001-01,
DRAFT A

Attached are copies of the above mentioned subject document for review and comment by the U.S. Environmental Protection Agency (EPA). Transmittal of this work plan satisfies Hanford Federal Facility Agreement and Consent Order Milestone M-13-26 for submittal of the 200-PW-1 Operable Unit (OU) RI/FS work plan to EPA by December 31, 2001. A draft Hanford Federal Facility Agreement and Consent Order Change Package is also provided for information.

This work plan is the sixth in a series of several which follow the streamlined approach outlined in the "200 Areas RI/FS Implementation Plan, Environmental Restoration Program," for characterization and remediation in the 200 Areas. The work plan contains the elements of a Comprehensive Environmental Response, Compensation and Liability Act of 1980 RI/FS work plan. The work plan also includes a carbon tetrachloride remediation strategy for the 200 West Area. This remediation strategy identifies the activities required to reach a final record of decision for the 200-PW-1 OU that addresses the remediation of carbon tetrachloride contamination in the vadose zone that will be protective of groundwater.

The remedial investigation will be divided into two phases: (1) characterization of known representative source term waste sites, and (2) characterization of the dispersed carbon tetrachloride vadose zone plume. The dispersed carbon tetrachloride vadose zone plume investigation is further divided into two steps, shallow/intermediate and intermediate/deep. The sampling and analysis plan (SAP) for the known representative source term waste sites investigation is provided in Appendix A. SAPs for shallow/intermediate and intermediate/deep dispersed carbon tetrachloride vadose zone plume investigations will be prepared and issued separately from the work plan. The shallow/intermediate SAP will also include the waste control plan for all of the 200-PW-1 investigations.

Mr. Douglas R. Sherwood
02-RCA-112

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The scheduled period for the regulatory review is January 2 through February 15, 2002. If you have any questions, please contact Ellen Dagan, of my staff, on (509) 376-3811, or Bryan Foley, of the Waste Management Division, on (509) 376-7087.

Sincerely,



for Joel Heddon, Director
Regulatory Compliance and Analysis Division

RCA:EBD

Attachments

cc w/ attachs:

D. A. Faulk, EPA

J. Price, Ecology

L. C. Treichel, EM-442

C. D. Wittreich, CHI

Admin Record, H6-08 9200-PW-1)

cc w/o attachs:

B. H. Ford, BHI

R. Gay, CTUIR

M. J. Graham, BHI

J. S. Hertz, FH

R. Jim, YN

O. S. Kramer, FHI

T. M. Marten, HAB

E. Murphy-Fitch, FHI

K. Niles, Oregon Energy

R. R. Skinnarland, Ecology

P. Sobotta, NPT

R. F. Stanley, Ecology

M. A. Wilson, Ecology

Change Number M-15-01-05	Federal Facility Agreement and Consent Order Change Control Form Do not use blue ink. Type or print using black ink.	Date 12/5/2001
Originator Bryan Foley, DOE		Phone 376-7087
Class of Change <input type="checkbox"/> I – Signatories <input checked="" type="checkbox"/> II – Executive Manager <input type="checkbox"/> III – Project Manager		
Change Title Interim Milestones for 200-PW-1 Plutonium-Rich/Organic-Rich Process Condensate/Process Waste Group Operable Unit RI/FS.		
Description/Justification of Change <p>The 200 Areas Remedial Investigation/Feasibility Study Implementation Plan – Environmental Restoration Program, DOE/RL-98-28, Rev. 0, established the approach for the assessment and remediation of 200 Area past-practice waste sites. Under this strategy, over 800 waste sites are grouped into 23 process-based operable units (OUs), which in turn are grouped into 9 major waste categories (e.g., process waste, landfills). This has resulted in a more streamlined remedial investigation/feasibility study (RI/FS) process and more suitable selection of tentative remedial alternatives. The 200-PW-1 OU has been identified as one representative OU for the Process Condensate/Process Waste Category. Based on the Implementation Plan, Tri-Party Agreement M-13 milestones were established (TPA Change Request M-13-97-01) for the submittal of RI/FS work plans for individual OUs. Under TPA Milestone M-13-00L, three RI/FS work plans are due by 12/31/01. Interim Milestone M-13-26 was established under TPA Change Request M-13-99-01 to satisfy, in part, Major Milestone M-13-00L. TPA Change Requests M-13-00-01 and M-13-01-01 assigned the 200-PW-1 Plutonium/Organic-Rich Process Waste Group Work Plan" to Milestone M-13-26 with a milestone date of 12/31/01.</p> <p>As specified in the Tri-Party Agreement, Section 11.6, work plans must specify interim milestones for the OU that identify completion dates for major tasks and deliverables specified in the work plans. The 200-PW-1 OU work plan includes a project schedule with target project milestones. Based on this work plan schedule, the following interim milestones are proposed under the Tri-Party Agreement to implement the activities for the RI/FS process for this OU:</p> <p><u>Justification/Description continued on Page 2</u></p>		
Impact of Change These interim milestone dates are consistent with the major milestone M-15-00C to complete the 200 Area operable unit RI/FS process by 2008. The proposed completion dates are beyond the compliance date for the M-20 Major Milestone and will be addressed in future negotiations. The M-20 milestone is the final step in environmental remediation activities (Closure Plans/Permits).		
Affected Documents The Hanford Federal Facility Agreement and Consent Order, as amended. The 200 Areas Remedial Investigation/Feasibility Study Implementation Plan – Environmental Restoration Program, DOE/RL-98-28, Rev. 0, established the approach for the assessment and remediation of 200 Area past-practice waste sites. 200-PW-1 Plutonium-Rich/Organic-Rich Process Condensate/Process Waste Group Operable Unit RI/FS Work Plan (DOE/RL-2001-01).		

Approval of this change request adds the following Tri-Party Agreement Interim Milestones:

- M-15-46A: Complete 200-PW-1 OU Field Work through Sample Collection– June 30, 2004
- M-15-46B: Submit 200-PW-1 OU Draft A Remedial Investigation Report to EPA – June 30, 2005
- M-15-46C: Submit 200-PW-1 OU Draft A Feasibility Study and Draft A Proposed Plan to EPA – March 31, 2006.

DRAFT

Change Number M-15-01-05	Federal Facility Agreement and Consent Order Change Control Form Do not use blue ink. Type or print using black ink.	Date 12/5/2001
Approvals		
_____	_____	_____ Approved _____ Disapproved
DOE	Date	
_____	_____	_____ Approved _____ Disapproved
EPA	Date	
_____	_____	_____ Approved _____ Disapproved
Ecology	Date	