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July 30, 1991



Mr. Allan Harris  
Aggregate Area Management Study Coordinator  
U.S. Department of Energy  
P.O. Box 550  
Richland, WA 99352

Re: Ecology Review of 200 Area Aggregate Area Management Study (AAMS)  
Draft Chapter 1.0

Dear Mr. Harris:

This submittal reflects Ecology's comments on the draft Chapter 1.0 of the AAMS for the 200 Areas. Some general comments apply as follows:

The Hanford Past Practice Investigation Strategy (HPPIS) document has not been finalized and does not provide a true framework for conducting AAMS in the 200 Areas. The strategy, as drafted, does not truly explain where the AAMS fits into the overall strategy. Figure 7 is never integrated with Figure 2, and Figure 2 apparently relates to decision flow lines for individual facilities and disposal units (based on Strategy scoping discussions) and not to overall operable units (or by inference, aggregate areas).

The preferred path of the HPPIS is probably not to achieve records of decisions (RODs) through interim remedial actions for the initial stages of the Hanford cleanup. The main path should be the RI/FS and the paths leading to IRMs, ERAs and LFIs would be offshoots of the RI/FS process. Figure 2 would apply to individual facilities within an aggregate area or operable unit. The AAMS would provide the scoping that was not done previously for RI/FS workplans. The rescoped workplans (such as proposed for the 100 Areas) would qualify as the format for the RI/FS process. It is entirely possible that, because much of the waste will be left in place in the 200 Areas, any remediation would be an interim measure or that "no action" would be a viable

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alternative, and therefore, a certain amount of characterization will be required. This characterization would be described through the modified RI/FS workplan. This process is suggested on page 12 of the chapter 1.0 outline.

The specific comments are attached.

Sincerely,



Charles S. Cline  
Hydrogeologist and Unit Manager  
Nuclear and Mixed Waste Mgmt.

Enclosure

cc: Rich Carlson, WHC  
Paul Day, EPA  
Tim Nord, Ecology  
Mike Thompson, DOE  
  
Steven Wisness, DOE

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## C O M M E N T S

1991 JULY 30

Re.: 200-Area Aggregate Area Management Strategy Draft chapter 1.0

1. page 3, first paragraph, last sentence, section 1.1

Comment: The HPPIS has not yet been developed. Its development is in progress.

Deficiency: The draft states that the HPPIS "establishes . . . ."

Recommendation: Replace the "establishes" with "is expected to . . . ."

2. page 3, fourth paragraph, first sentence, section 1.1.2

Comment: The HPPIS has not yet been developed. Its development is in progress.

Deficiency: The draft states that the HPPIS "was developed."

Recommendation: Replace the "was" with "is being."

3. page 3, fourth paragraph, fourth sentence, section 1.1.2

Comment: Maximizing the use of existing data is not a principle of the draft HPPIS. Other considerations balance the use of existing data, such as data quality and data access.

Deficiency: The draft states that a fundamental principle of the HPPIS is maximizing the use of existing data.

Recommendation: Replace the word "maximizing" with the word "optimizing."

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4. page 3, fourth paragraph, fourth sentence, section 1.1.2

**Comment:** Limiting the RI/FS is not a principle of the draft HPPIS. Concepts that are applicable to the RI/FS are "focusing," tailoring," and "streamlining."

**Deficiency:** The draft states that a fundamental principle of the HPPIS is limiting the RI/FS.

**Recommendation:** Delete or replace the word "limiting."

5. page 3, fourth paragraph, second from the last sentence, section 1.1.2

**Comment:** Ecology has not taken the position that achieving RODs through IRMs is the preferred path for the initial stages of Hanford cleanup. Ecology recognizes neither RODs nor IRMs as a preferred path for the initial stages of Hanford cleanup. Ecology believes that the RI/FS is primary vehicle for Hanford site cleanup through the ROD. Ecology recognizes that achieving RODs through IRMs is but one path for the initial stages of Hanford cleanup. This matter is currently under discussion by the three parties developing the HPPIS.

**Deficiency:** The draft states that achieving RODs through IRMs is the preferred path for the initial stages of Hanford cleanup.

**Recommendation:** Delete this sentence.

6. page 3, fourth paragraph, last sentence, section 1.1.2

**Deficiency:** The draft states that the ultimate goal of the process is "successful cleanup or closure of contaminated areas." This goal is overly narrow.

**Recommendation:** Replace "successful cleanup or closure of contaminated areas" with comprehensive cleanup or closure of all contaminated areas at the Hanford site."

7. page 12, first full paragraph, section 1.2.2

**Comment:** The list ARARs is not final until the ROD.

**Deficiency:** The draft implies that ARARs would be final in the AAMS.

**Recommendation:** Insert "preliminary" before the "applicable."

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Subject: Ecology Review of 200 Area Aggregate Area Management Study (AAMS)  
Draft Chapter 1.0

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