

# START

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STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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May 10, 1993

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F.A. RUCK III

MAY 18 1993

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FILE \_\_\_\_\_

Mr. Steven H. Wisness  
Hanford Project Manager  
U.S. Department of Energy  
P.O. Box 550 MS/A5-15  
Richland, WA 99352

Dear Mr. Wisness:

Re: Need for Resources to Develop Site-wide Background Values for Soil and Ground Water, Milestone M-28-00

References: Tri-Party Agreement Milestone Summary - May 1992, TRAC-0344-1 22591  
Tri-Party Agreement Milestone Summary - June 1992, TRAC-0344-2 22854  
Memo from J.D. Hoover, WHC, to T.M. Wintczak, WHC, dated March 26, 1993.

The Washington State Department of Ecology (Ecology) and the U.S. Environmental Protection Agency (EPA) believe that the Department of Energy (DOE) may not be aware that there is still considerable outstanding work on the Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) M-28 site-wide background milestone. Tri-Party Agreement Milestone Summary TRAC-0344-1 states that this milestone was completed by April 1992. The subsequent Tri-Party Agreement Milestone summaries do not even list this particular milestone (see Tri-Party Agreement Milestone Summary, TRAC-0344-2, and the subsequent summaries). Both the soils and ground-water background documents were incomplete (i.e., the soil report submitted to satisfy M-28-03 only discussed six contaminants, the ground-water background report submitted to satisfy M-28-04 did not include critical supplementary tables and appendices; the ground-water tables and appendices were not provided until November, 1992). Westinghouse Hanford Company (WHC) did not include necessary information that would allow sites to be compared to a



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background value (or range of values). Background values are important in order to determine the extent of contamination as part of characterization efforts, determine a priori what cleanup effort may be required for remediation or determine when a site has been remediated. It is to our mutual benefit that site-wide background be established for all contaminants of concern at Hanford. This needed to have been done by now because limited field investigations (LFIs) and risk assessment reports have been written without an established background as a frame of reference.

WHC has estimated the costs for completing the Hanford site-wide background project and a draft of these figures is shown in enclosure #1 to this letter. The projected budget shows that work is to continue through the year 1999, more than seven years past the initial milestone. Hanford site-wide background values are needed much sooner than is anticipated by this projection. Some of the work could be potentially accelerated as presented in a memo dated March 26, 1993, from Jim Hoover to Tom Wintczak, both of WHC. The accelerated work would be done in the remainder of FY 1993 using current surplus resources that had been allocated for other FY 1993 projects. This is appropriate since the background effort supports most other Hanford projects. However, funding for completing this milestone should not be an issue. The concept of "milestones" within the Tri Party Agreement is that DOE commit to funding specific objectives and activities through completion in a timely manner.

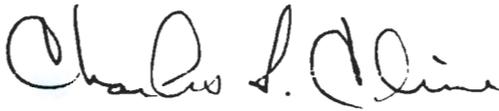
Savannah River National Laboratory, Oak Ridge National Laboratory, Rocky Flats, Idaho National Engineering Laboratory, and Los Alamos National Laboratory are all in some stage of either determining or completing some type of site-wide background, or have fallen back to risk-based standards (INEL) for risk assessment at their site. It would appear however, regardless of whether they are ahead or behind Hanford in the process, except for INEL, they have committed greater resources to developing some type of background at their sites. The other DOE sites have recognized the need to establish background and have committed commensurate resources for this effort; Hanford needs to do likewise. It would be very beneficial for us at Hanford to hold a workshop that would bring the expertise from throughout the DOE complex to Richland (or some intermediate location) to discuss the experiences and processes of developing site-wide background values for soils and ground water and evaluating risk at the various sites. Apparently, there is much interest throughout the DOE complex to have some type of workshop or exchange of ideas on this subject. Enclosure #2 is an example of the interest shown by Rocky Flats to have a workshop or informal exchange. In the meantime, DOE must commit to providing the necessary resources to complete milestone M-28 in a timely fashion.

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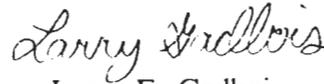
Mr Steve Wisness  
May 10, 1993  
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If you have questions please contact Chuck Cline at (206) 438-7556 or Larry Gadbois at (509) 376-9884.

Sincerely,



Charles S. Cline  
Hydrogeologist  
WA State Department of Ecology



Larry E. Gadbois,  
Environmental Scientist  
EPA-Hanford Project Office

CC:lj

Enclosures

cc: George Hofer, EPA  
Paul Day, EPA  
Bob Stewart, DOE  
Fred Ruck, WHC  
Jim Hoover, WHC  
Becky Austin, WHC

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**Enclosure #1.** Table of Resources Needed to Complete Milestone M-28 as Provided to Ecology by WHC During Sitewide Background Meeting of 3/23/93. This Table was Provided at the Request of Ecology.

Budget for Hanford Site-wide Background Project								
				DRAFT				
in thousands of dollars								
	Year:	1993	1994	1995	1996	1997	1998	1999
Labor		349	471	471	194	194	194	194
Materials, Service		49	19	19	15	15	15	15
Contractors		50	2225	2225	0	0	0	0
Internal Charges		8	200	200	150	150	150	150
BCSR		60	40	40	10	10	10	15
Total		516	2955	2955	369	369	369	374

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Department of Energy

ROCKY FLATS OFFICE  
P.O. BOX 928  
GOLDEN, COLORADO 80402-0928

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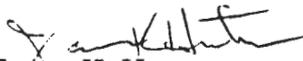
Mr. Chuck Cline  
Washington State Department of Ecology  
P. O. Box 47600  
Olympia, Washington 98504-7600

Dear Mr. Cline:

Enclosed is the Background Geochemical Characterization Plan that you requested from Mark Levin of EG&G. I understand that you are interested in organizing a workshop among DOE Weapons Complex environmental specialists to discuss issues related to determining background levels. We would be pleased to have you consider Rocky Flats as a possible location for the workshop, and would be willing to help organize this with you. We would also be interested in participating if you decide to hold the workshop at another site, and ask that you keep us informed of developments.

Please call Jen Pepe at (303) 966-8582 if you wish to discuss this offer.

Sincerely,

  
James K. Hartman  
Assistant Manager for Transition  
and Environmental Restoration

Enclosure

cc w/o Enc:  
M. Levin, EG&G

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## CORRESPONDENCE DISTRIBUTION COVERSHEET

Author: C. S. Cline, Ecology  
L. E. Gadbois, EPA

Addressee: S. H. Wisness, RL

Correspondence No.: Incoming 9302947

Subject: NEED FOR RESOURCES TO DEVELOP SITE-WIDE BACKGROUND VALUES FOR SOIL AND GROUND WATER, MILESTONE M-28-00

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		DJH/LB	H6-23	

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\*REISSUE

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		T. Legore	B4-63	X
		R. J. Landon	H6-22	X
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		P. J. Mackey	B3-15	X
		H. E. McGuire (Level I)	B3-63	X
		J. K. Patterson	H6-27	X
		R. M. Pfluger	H6-27	X
		S. M. Price	H6-23	X
		F. A. Ruck III	H6-23	X
		EDMC	H6-08	X
		RCRA File/GHL	H6-23	X
		DJH/LB	H6-23	X
		R. D. Wojtasek (Assignee)		X

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\*Reissue on 6/14/93 to add R.D. Wojtasek and to show him as the correct Assignee. Letter only, except Letter/enc to Wojtasek.