



June 18, 2008

Briant Charboneau Federal Project Director U.S. Department of Energy Richland Operations Office PO Box 550, A6-33 Richland, Washington 99352



Re: Retirement of 200 Areas Remedial Investigation/Feasibility Study Implementation Plan – Environmental Restoration Program, DOE/RL-98-28, Revision 0

Dear Mr. Charboneau:

The U.S. Department of Energy (U.S. DOE) drafted the 200 Areas Remedial Investigation/Feasibility Study Implementation Plan – Environmental Restoration Program, DOE/RL-98-28, Revision 0 (Plan) in 1998 to provide a template for RI/FS activities within the Hanford 200 Area National Priorities List site. The Plan supported Remedial Investigations/Feasibility Studies (RI/FSs) required by the Hanford Federal Facility Agreement and Consent Order (HFFACO) Revision 5. All of the 200 Area source operable units are covered by approved RI/FS work plans. The primary purpose of the Plan was to support the development of these RI/FS work plans. Therefore, the Plan has served its intended purpose.

Some portions of the Plan are in error or outdated because of programmatic changes or new information. The Washington State Department of Ecology (Ecology) and the U.S. Environmental Protection Agency (U.S. EPA) request that U.S. DOE retire the Plan because it is: outdated, in error, and has served its original purpose. We transmit this request now because U.S. DOE and its contractors continue to cite the Plan. The *Deep Vadose Zone Treatability Test Plan for the Hanford Central Plateau* (DOE/RL-2007-56) is an example. The draft treatability test plan cited the outdated list of technologies in Appendix B of the Plan. Ecology and U.S. EPA could provide other examples where the Plan is outdated or in error. We choose not to transmit detailed review comments with this letter.

The Tri-Parties have previously discussed updating the Plan. Ecology and U.S. EPA decline to update it for two reasons. First, there are only 3½ years left until the end of the 200 Areas Remedial Investigation/Feasibility Study (HFFACO milestone M-15-00c, due 12/31/2011). If the Tri-Parties took one year to update the Plan, they would only use it for 2½ years. Second, the Hanford FFY2009 budget is non-compliant with HFFACO milestones. Ecology and U.S. EPA decline to have U.S. DOE allocate budget to update the plan, because the Plan is not a compliance item.

If you have any comments or questions please contact John Price at (509) 372-7921 or Craig Cameron at (509) 376-8665.

Sincerely,

X I

John Price

200 Area Project Manager

**Ecology** 

cc: Susan Leckband, HAB

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Admin. Record: 200 Area

Craig Cameron

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U.S. EPA