



0078735

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

3100 Port of Benton Blvd • Richland, WA 99354 • (509) 372-7950

September 4, 2008

Mr. Craig E. Cameron, Environmental Scientist
United States Environmental Protection Agency
309 Bradley Boulevard, Suite 115
Richland, Washington 99352

RECEIVED
SEP 11 2008
EDMC

Re: 200-CW-5 Operable Unit Feasibility Study and Proposed Plan

Dear Mr. Cameron:

The United States Environmental Protection Agency (EPA) is the Lead Regulatory Agency for the 200-CW-5 Operable Unit. The Department of Ecology is the Support Agency. Ecology reviewed the 200-CW-5 Feasibility Study and Proposed Plan in accordance with the Ecology-EPA Hanford Memorandum of Understanding (MOU). Per the MOU, we limited our review to Applicable or Relevant and Appropriate Requirements (ARAR) in the Feasibility Study. We reviewed the entire Proposed Plan. The following general observations are based on our limited review:

- Ecology does not support the preferred alternative as presented in the Proposed Plan.
- The Proposed Plan does not present a logical basis for choosing the preferred alternative in accordance with Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) nine criteria. In accordance with the Ecology-EPA MOU, Ecology did not review the detailed analysis of alternatives in the Feasibility Study.
- The Proposed Plan allows leaving transuranic contamination in place. This is a significant action with long-term implications. The Proposed Plan does not address 40 Code of Federal Regulations 300.430(e)(9)(iii)(C)(2) commensurate to the long-term implications of the preferred alternative.
- The Proposed Plan asserts that the preferred remedy meets the CERCLA threshold criteria to comply with ARARs. The Proposed Plan provides no basis for this conclusion, as it does not identify any ARARs.

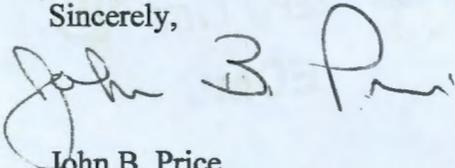


2878700
Mr. Craig E. Cameron
September 4, 2008
Page 2

- The Proposed Plan does not document that the preferred alternative meets the Washington regulations requiring corrective action for releases from solid waste management units.
- The Proposed Plan does not document the characterization of the 200-CW-5 sites for dangerous waste constituents.

If there are any questions, contact me at 509-372-7921 or Brenda Jentzen at 509-372-7912.

Sincerely,



John B. Price
Environmental Restoration Project Manager
Nuclear Waste Program

aa

cc: Briant Charboneau, USDOE
Stuart Harris, CTUIR
Gabriel Bohnee, NPT
Russell Jim, YN
Susan Leckband, HAB
Ken Niles, ODOE
Administrative Record: 200-CW-5
Environmental Portal