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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

1315 W. 4th Avenue • Kennewick, Washington 99336-6018 • (509) 735-7581

April 13, 1998

Mr. Glenn Goldberg
U. S. Department of Energy
P. O. Box 550, MSIN: H0-12
Richland, WA 99352



Dear Mr. Goldberg:

Re: Review of the *Remedy Selection Process for Remaining 100 Area Source Operable Unit Waste Sites* (DOE/RL-94-61 Appendix N Draft A) and *Proposed Plan for Interim Remedial Actions at the 100 Area Remaining Sites* (DOE/RL-97-83 Draft A) 48580
48581

The Washington State Department of Ecology (Ecology) and the U. S. Environmental Protection Agency (EPA) have completed the review of the *Remedy Selection Process for Remaining 100 Area Source Operable Unit Waste Sites* (DOE/RL-94-61 Appendix N Draft A) and *Proposed Plan for Interim Remedial Actions at the 100 Area Remaining Sites* (DOE/RL-97-83 Draft A). Enclosed, for your review and response, are the agencies' comments and questions concerning both documents. EPA and Ecology look forward to working with the U.S. Department of Energy to resolve these comments.

If you have any questions or need clarification on any comments or questions, please feel free to call Keith at (509) 736-3036 or Dennis at (509) 376-8631.

Sincerely,

Keith K. Holliday
100-D Area Project Manager
Washington State Department of Ecology

Sincerely,

Dennis Faulk
100-B/C Project Manager
U. S. Environmental Protection Agency

KH:skr
Enclosure (2)

cc: Clarence Corriveau, BHI
Dick Jaquish, DOH
Doug Sherwood, EPA
Owen Robertson, USDOE
Dirk Dunning, ODOE

Administrative Record:

- 100-BC-1 Operable Unit
- 100-BC-2 Operable Unit
- 100-DR-1 Operable Unit
- 100-DR-2 Operable Unit
- 100-FR-1 Operable Unit
- 100-FR-2 Operable Unit
- 100-HR-1 Operable Unit
- 100-HR-2 Operable Unit
- 100-KR-1 Operable Unit
- 100-KR-2 Operable Unit

**Review of the Proposed Plan for Interim Remedial Actions at the 100 Area
Remaining Sites (DOE/RL-97-83 Draft A)**

General Comments

1. Public Meeting needs to be changed to Public Meeting/Hearing throughout the document, and the review period needs to be 45-days.
2. Change "preferred standard remedy" and "standard remedy" to "preferred remedy" throughout the document.

Specific Comments

1. Page 1, Second paragraph, delete "lead" and "support." Change sentence to state both agencies has regulatory responsibility.
2. Page 3, replace this figure with Figure 2 of Appendix N (DOE/RL-94-61 Draft A).
3. Page 4, RCRA/CERCLA Box, express here that this opportunity to comment in the RCRA process, the permit modification will be administrative. Identify where the permit conditions can be found.
4. Page 4, first column, first paragraph, delete, "These characteristics must fall within a set of characteristics that the Tri-Parties has determined to be appropriate for remediation using the standard remedy."
5. Page 4, first column, second paragraph, add "1995" between "September" and "ROD."
6. Page 4, first column, second paragraph, delete, "The ROD included 37 waste sites in the 100-BC-1, 100-DR-1, and 100-HR-1 Operable Units and the ROD Amendment included 34 waste sites in the 100-BC-2, 100-DR-1, 100-DR-2, 100-FR-1, 100-HR-1, 100-KR-1, and 100-KR-2 Operable Units (collectively called the 100 Area ROD sites for the purposes of this Proposed Plan)."
7. Page 4, second column, first paragraph, delete last three bullets.
8. Page 4, second column, third paragraph, delete "Use of the Plug-in Approach using the standard remedy of Remove/Treat/Dispose is the initial recommendation of the Tri-Parties."
9. Page 5, first column, first paragraph under Current Remedial Actions in the 100-BC, 100-D, 100-H, 100-F, and 100-K Areas; delete the entire paragraph.
10. Page 5, first column, Second paragraph under Current Remedial Actions in the 100-BC, 100-D, 100-H, 100-F, and 100-K Areas; insert "lab" between "and" and "analysis."

**Review of the Proposed Plan for Interim Remedial Actions at the 100 Area
Remaining Sites (DOE/RL-97-83 Draft A)**

11. Page 5, second column, second paragraph under 100 Area Remaining Sites, delete entire paragraph.
12. Page 5, second column, third paragraph under 100 Area Remaining Sites, delete "To determine whether contaminants pose a threat to human health, the type of future land use (and therefore the amount of time an individual may be exposed to contaminants) must be defined. However, the final land use for the 100 Areas has not been determined."
13. Page 6, first column, delete "Petroleum Sites Section."
14. Page 6, second column, third paragraph, delete "requirements" after "(TBC)", and "and for all potential land uses at the 100 Areas."
15. Page 6, second column, 2nd bullet, delete "Method B Standards", and 5th bullet delete "Draft DOE standards for terrestrial animals."
16. Page 6, second column, last paragraph, delete entire paragraph that starts with "An assumption made in earlier 100..."
17. Page 7, first column, first paragraph, delete "4.6m below the ground surface" and "below 4.6m."
18. Page 7, first column, change section title from "Preferred Standard Remedy" to "Preferred Remedy."
19. Page 7, first column, first paragraph under Preferred Standard Remedy, change fifth sentence to read, "Should it be impracticable to treat waste to meet ERDF waste acceptance criteria, it will be stored until a disposal decision."
20. Page 7, second column, second paragraph, change second sentence to read, "If sampling determines that the site does not fit the site profile, it will be evaluated and appropriate documentation produced."
21. Page 7, second column, delete third paragraph that starts with "It is the intent..."
22. Page 8, first column, add to footnote 3 "technically feasible or " between "be" and "cost-effective."
23. Page 9, second column, where is state acceptance?
24. Page A-10, add Cr⁺⁶ to sites 100-H-22 and 116-H-5.
25. Table A-1 and A-2, remove "Media" column; add cost and volume columns and note RPP and CPP by asterisk.

**Review of the Remedy Selection Process for Remaining 100 Area Source Operable
Unit Waste Sites (DOE/RL-94-61 Draft A)**

General Comments

1. Identify RCRA TSDs, give the status of the unit and future plan.
2. RCRA Past Practice needs to also be identified when CERCLA is used throughout this document.
3. Replace "Standard Remedy" with "Preferred Remedy" throughout the document.
4. The preferred remedy is remove, treat as appropriate or required, and dispose. Please make this consistent throughout the document.

Specific Comments

1. Page N-1, second paragraph, need to exclude burial grounds.
2. Page N-3, section N2.1.1, third paragraph, delete "for long term radioactive decay."
3. Page N-3, section N2.1.2, add 100-D Ponds.
4. Page N-5, section N2.1.4, 183-H underwent a modified closure not D&D.
5. Page N-7, section N2.2.4, add Total Petroleum Hydrocarbons (TPH).
6. Page N-8, section N3.1.2, last paragraph, make this consistent with page 7 of the proposed plan.
7. Page N-9, Figure N-2, use WAC citations not site types in Non-CERCLA/RCRA box.
8. Page N-10, Table N-1, add "RCRA Past Practice" column, bullet "Other Regulatory Authorities" column, delete "ROD and ROD Amendment" column.
9. Page N-11, section N3.1.3, replace "MG-08" with "MP-14."
10. Page N-11, section N3.1.3, third sentence should read "This category indicated that candidate waste sites had been determined by the Tri-Parties to not contain hazardous substances, therefore, were not waste management units and not within the scope of the Tri-Party Agreement."
11. Page N-11, section N3.1.3, there does not appear to be a difference between step 1 and step 2. Suggest combining these steps.
12. Page N-11, section N3.1.3, Step 3, replace the site type descriptions with WAC citations and make rejected consistent with Figure N-2.
13. Page N-11, section N3.1.3, Step 4, add "RCRA Past Practice" after "CERCLA."

**Review of the Remedy Selection Process for Remaining 100 Area Source Operable
Unit Waste Sites (DOE/RL-94-61 Draft A)**

14. Page N-11, section N3.1.3, Step 5, third sentence should read "The Tri-Parties have agreed to disposition 100 Area burial grounds in a separate Proposed Plan and ROD."
15. Page N-11, section N3.1.3, Step 5, delete "Also, the burial grounds did not receive contaminated liquids, soil, or chemicals that could be mobilized to contaminate environmental media."
16. Page N-13, section N4.0, first paragraph, last sentence should read " For sites that cannot be "plugged-in" to the preferred remedy due to differing characteristics, remedial actions will be determined through the appropriate process."
17. Page N-14, Figure N-3, include newly discovered to this figure.
18. Page N-15, section N4.1.2, last bullet, delete "and exposure."
19. Page N-16, section N4.1.2, bullets, delete "Method B cleanup standards" and "Draft DOE standards for terrestrial animals."
20. Page N-17, section N4.2.1, delete last three bullets.
21. Page N-17, section N4.2.2, second paragraph, last sentence; replace "a separate CERCLA process (e.g., ROD ESD, ROD Amendment, EE/CA)" with "the appropriate process."
22. Page N-18, section N4.2.4, fourth sentence should read "Should the additional data show that the site contains contaminants, contaminated media, or other physical characteristic that fall outside the site characteristic profile, and will not plug-in to the standard remedy, the Tri-Parties will reevaluate the site."
23. Page N-18, section N4.2.5, revise this section with the new cost estimates.
24. Page NA-1, Table NA-1, footnote Estimated Cost of Site Remediation and explain the difference in cost per LCY between sites. Are there cost breaks for multiple sites? Please add the K basin site(s) and RPP/CPP somewhere.