

Mr. John Price  
 Washington State Department of Ecology  
 3100 Port of Benton Blvd.  
 Richland, WA 99354-1670

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 OCT 27 2005

EDMC

October 10, 2005

RE: 216-U-12 Crib, 200-UP-1 Operable Unit (OU), 200-UW-1 OU, and 200-UW-1 Waste Sites Proposed Plan

Dear Mr. Price:

To date, the Washington Department of Ecology (Ecology) has not responded to my June 27, 2005 comments submitted during the 200-UW-1 Waste Sites Proposed Plan comment period and in relation to the proposed reclassification of the 216-U-12 Crib. As my comments were submitted during the 200-UW-1 Waste Sites Proposed Plan (which includes the 216-U-12 Crib), I believe a response to my comments prior to the 216-U-12 Crib reclassification public involvement event is appropriate and I await Ecology's response.

As a citizen, I received five electronic public involvement mail messages (April 6, 2005 [1:25 pm], April 6, 2005 [1:55 pm], May 2, 2005, May 13, 2005, and May 18, 2005) regarding the 200-UW-1 OU cleanup decision-making process. The April 6, 2005 [1:25 pm] message provided advanced notice of public comment period on the 216-U-12 Crib permit modification to include the unit in the Hanford Site Wide RCRA Permit. The April 6, 2005 [1:55 pm] message provided notice of an upcoming public comment period on the cleanup alternatives evaluated for the U Plant Area Waste Sites (200-UW-1 OU). The May 2, 2005 message provided notice that the "public comment period for the 216-U-12 Crib, coinciding with the 200-UW-1 Proposed Plan, has been postponed one week." The May 13, 2005 message provided notice that of cleanup alternatives evaluation for the U Plant Area Waste Sites (200-UW-1 OU). It is worthy of note that the four messages all identified the 216-U-12 Crib as a Resource Conservation and Recovery Act (RCRA) treatment, storage, and disposal (TSD) unit. The May 18, 2005 message provided "updated information" for the 216-U-12 Crib permit modification to be included into the Hanford Site Wide RCRA Permit. This message indicated that "recent information provided to the Washington State Dept. of Ecology by the US Dept. of Energy may affect the permitting process for the 216-U-12 crib at Hanford." The message clearly indicated that the public comment period for the 200-UW-1 CERCLA Proposed Plan comment period would occur as planned and that Ecology would further explain the possible change in status for the 216-U-12 crib at the public meeting. It is worthy of noting that none of the messages indicated that public comments would not be received for the proposed reclassification of the 216-U-12 Crib. Again, I submitted comments during the 200-UW-1 Waste Sites Proposed Plan public comment period and as such, believe that I deserve a response to my comments via the 200-UW-1 Waste Sites Proposed Plan Responsiveness Summary.

Considering the technical and regulatory complexities associated with the 200-UW-1 OU (which contains 30 soil waste sites and one RCRA TSD unit (216-U-12 Crib) in the vicinity of the 221-U Plant Facility (U Plant) chemical processing plant) and the agency's division of groundwater and source units, I request the public involvement process be coordinated to address:

1. the 30 soil waste sites,
2. the 1 RCRA TSD (216-U-12 Crib),
3. the source OU,
4. the groundwater OU, and
5. the designated groundwater point of compliance for each of the 31 waste sites.

I submitted my 216-U-12 Crib re-classification comments so that they could be considered in context of the 30 other waste sites, the source OU, the groundwater OU, and the RCRA and MTCA groundwater point-of-compliance (groundwater protection) standards. I respectfully submit that when the agency separates cleanup decisions, it is very difficult for the public to understand: 1) the cleanup decision-making process

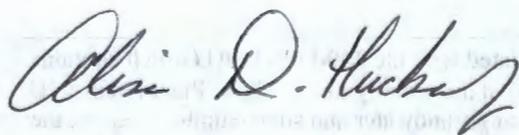
and 2) if and/or how applicable environmental protection standards are being satisfied. I request that the cleanup decisions for: the 200-UW-1 OU, 2) the 200-UP-1 OU, and 3) the 216-U-12 Crib be made simultaneously. In this way, the public can 1) understand the cleanup decisions as they relate to all regulatory and administrative requirements and components, and 2) actively engage in the public involvement process with an understanding of what is being proposed. Without the public understanding which environmental protection standards will be applied to which component (source OU, groundwater OU, and RCRA TSD unit), it is unfair to ask the public to comment on a proposed cleanup action that cannot be properly put into context with other related actions or even applicable standards. Therefore, I request that the public comment period be repeated after Ecology can identify:

1. if RCRA groundwater protection standards of WAC 173-303-645 will be applied to the 216-U-12 Crib,
2. if RCRA closure performance standards of WAC 173-303-610 will be applied to the 216-U-12 Crib,
3. how RCRA corrective action standards of WAC 173-303-646 will be applied to the 30 or 31 non-TSD waste sites,
4. which and how RCRA and MTCA ARARs will be satisfied for the 30 or 31 non-TSD waste sites,
5. criteria for requiring unit-specific groundwater point-of-compliance monitoring for the 30 or 31 waste sites (to satisfy MTCA groundwater protection standards),
6. criteria for determining if deep vadose zone contamination characterization will be obtained for the 30 or 31 non-TSD waste sites,
7. quantifiable criteria (i.e., numerical standards applied at a/the specified point of compliance) for deciding if waste will be removed from any or all of the 30 or 31 non-TSD waste sites,
8. quantifiable criteria (i.e., numerical standards applied at a/the specified point of compliance) for deciding if any of the 30 or 31 non-TSD waste sites will be capped, and
9. unit-specific and media-specific (i.e., vadose zone and groundwater) criteria for monitoring the effectiveness of a cap for any or all of the 30 or 31 non-TSD waste sites.

In summary, this member of the public is confused by the process by which cleanup decisions will be (or are being or have been) made and the public involvement process for the cleanup decisions affecting the 216-U-12 Crib, the 200-UP-1 OU, and the 200-UW-1 OU. Therefore, I request a "re-do" of the entire cleanup decision-making and public involvement processes for the 216-U-12 Crib, the 200-UP-1 OU, and the 200-UW-1 OU.

If you have any questions or would like to discuss this letter, I may be reached at (509) 627-1162.

Sincerely and in well-deserved confusion,



Alisa D. Huckaby  
1524 Ridgeveiw Ct.  
Richland, WA 99352

c: Todd Martin, HAB  
TJ Johnson, PEER  
216-U-12 Crib, 200-UP-1 OU, 200-UW-1 OU Administrative Records