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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
1315 W. 4th Avenue • Kennewick, Washington 99336-6018 • (509) 735-7581

June 21, 1995

Ms. Arlene Tortoso
United States Department of Energy
PO Box 550
Richland WA, 99352.

Dear Ms. Tortoso:

RE: 100-DR-2 Work Plan Approval

The Washington States Department of Ecology(Ecology) and the U. S. Environmental Protection Agency (EPA) have finished their review of *the RCRA Facility Investigation/Corrective Measures Study Work Plan for the 100-DR-2 Operable Unit (e.g.,DOE\RL-93-46, REV 2),* as stipulated in the Hanford Federal Facility Agreement and Consent Order, Fourth Amendment, Jan. 1994. The following comments will require resolution prior to final approval of the subject document:

O The commercial\industrial land use scenario discussion provided in Chapter 3, Section 3.3 will need revision. Specifically, the sentence stating ,"This is appropriate because DOE is currently maintaining active institutional controls on the Hanford Site and intends on doing so for the foreseeable future." Current management of the site has little, if anything, to do with future land use. To date, Ecology and EPA have not agreed to alternative land use scenarios for the 100 Area Source Operable Units.

O Appendix D (e.g., the 100-DR-2 LFI\QRA)of the work plan is still deficient in terms of including surface water and groundwater exposure pathways for assessing the potential long term risk associated with the 100-DR-2 OU. Even if the commercial\industrial land use scenario was viewed as being the correct scenario, it would by definition include assessment of the aforementioned pathways as identified in *the Hanford Site Risk Assessment Methodology* (e.g., DOE\RL-91-45, Rev 3). Additionally there are several sites that have been discontinued from the IRM pathway without prior regulator agreement. Ecology and EPA are concerned that elimination of these sites from the IRM pathway is a direct outcome of the current risk assessment for 100-DR-2.

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O At least one site may be incorrectly categorized as a low priority site (e.g., 116-DR-10).

Regulatory approval of the subject document will require revision of Section 3.3, as well as revision of Appendix D of the work plan, as discussed above.

Ecology will be available immediately for appropriate discussion with EPA and USDOE. Ecology recommends reissuing of the document be held until all issues are resolved. Discussions on Appendix D will most likely parallel discussions on the Feasibility Study and Proposed Plan due to the regulators on June 30, 1995.

If you have any questions or concerns, please contact me at (509) 736-3012.

Sincerely,

Ted A. Wooley
Unit Manager
Nuclear Waste Program

cc: Julie Erickson, USDOE
Kevin Oates, EPA
Administrative Record (100-DR-2)