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CHAPTER 2.0
INTRODUCTION

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INTRODUCTION

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1 **2.0 300-FF-1 PROPOSED PLAN DISCUSSIONS AND EFFECTS ON THE 300-FF-1 PHASE III**
2 **FEASIBILITY STUDY AND 300 AREA PROCESS TRENCHES**
3 **MODIFIED CLOSURE/POSTCLOSURE PLAN**

4 **2.1 Introduction**

5 The purpose of this addendum is to document the discussions and present the data and evaluations that
6 have been developed after submittal of the 300-FF-1 Phase III Feasibility Study (FS) to the regulatory
7 agencies for review. A number of issues were raised by the regulatory agencies that have been addressed
8 over the past several months. Discussions of issues between the U.S. Environmental Protection Agency
9 (EPA), the Washington State Department of Ecology (Ecology), and the U.S. Department of Energy
10 (DOE) resulted in additional technical reviews of analytical data and site conditions that, in some cases,
11 enhance or modify certain aspects within the 300-FF-1 Phase III FS and the 300 Area Process Trenches
12 (300 APT) Modified Closure/Postclosure Plan. Rather than completely revise each document, this
13 addendum is included which summarizes the discussions, data review, evaluations, and technical changes
14 made. It supersedes related discussions in both documents and by inclusion in these documents is made
15 part of the 300-FF-1, 300-FF-5, and 300 Area APT Administrative Records.

16 A listing of topics the addendum addresses is discussed in the next paragraph. The first item on that list is
17 very important and warrants discussion in the introduction. A key conclusion resulting from using data
18 collected prior to the Remedial Investigation (RI)/FS is that several chemical constituents are identified
19 above regulatory standards for the 300 APT. The text in the 300 APT Modified Closure/Post Closure
20 Plan currently indicates no chemical constituents are above *Model Toxics Control Act* (MTCA) Level C
21 Industrial Soil Cleanup Values. This results in a substantial change to the conclusions made within the
22 closure plan. Exceedance of this regulatory standard is a new regulatory driver to take cleanup action in
23 the 300 APT in addition to the previously documented uranium risk driver. There were no changes to
24 conclusions in the 300-FF-1 Phase III FS risk assessment using the older data. The magnitude of this
25 change suggests that it is very important for reviewers to read this addendum as it supersedes some
26 analyses in both the 300-FF-1 Phase III FS and the 300 APT Modified Closure/Postclosure Plan.

27 The key areas addressed in the addendum are (1) change in use of (SW-846) data collected prior to
28 *Comprehensive Environmental Response, Compensation, and Liability Act* (CERCLA) characterization
29 activities, (2) evaluation and use of additional cobalt-60 data from the South Process Pond, (3)
30 development of a uranium cleanup standard, (4) evaluation of a cost-efficient technique to meet MTCA C
31 Industrial Soil Cleanup Values, (5) review of volume and cost estimates, (6) revision of remedial
32 alternatives, and (7) establishing proposed preferred remedial alternatives.

33 Another topic that merits a brief discussion here is the combining of the 300-FF-1 and 300-FF-5 Operable
34 Units Proposed Plans. During review of the separate 300-FF-1 and 300-FF-5 Proposed Plans, the
35 regulators determined that the documents should be combined to create a more integrated approach.
36 Therefore, the proposed plan has been written to combine information from both operable units. Once the
37 Public Comment Period is completed, the remedial alternatives for both operable units and the 300 APT
38 will be presented in the Record of Decision. In addition, 300 APT-specific permit conditions will be
39 administratively incorporated into the site-wide permit.

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