

Environmental Control Plan for 200 Area Vadose Zone Investigation Activities

*Prepared for the U.S. Department of Energy, Richland Operations Office
Office of Environmental Restoration*

Submitted by: Bechtel Hanford, Inc.

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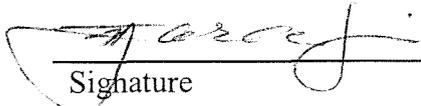
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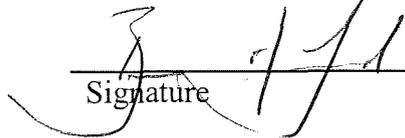
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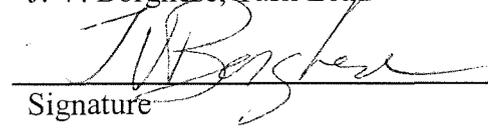
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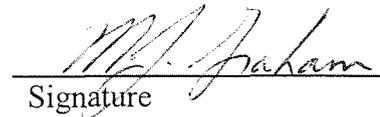
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BHI-01479
Rev. 0

Environmental Control Plan for 200 Area Vadose Zone Investigation Activities

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Date Published

March 2001

TABLE OF CONTENTS

1.0	OVERVIEW, PURPOSE, AND OBJECTIVES	1
1.1	PROJECT OVERVIEW	1
1.2	PURPOSE	1
1.3	OBJECTIVES	2
2.0	ENVIRONMENTAL REQUIREMENTS AND CONTROLS	2
2.1	EMERGENCY RESPONSE	2
2.1.1	All Areas	2
2.1.2	Treatment, Storage, and Disposal Unit Areas	3
2.2	SPILLS AND RELEASES	3
2.3	DRILLING, BOREHOLES, AND DRIVE CASINGS	4
2.4	SAMPLING AND GEOPHYSICAL LOGGING	4
2.4.1	General Sampling Criteria	4
2.4.2	Specific Sampling Criteria	5
2.5	WASTE MANAGEMENT	6
2.5.1	General Waste Management Criteria	6
2.5.2	Specific Waste Management Criteria	7
2.6	INSPECTIONS	7
2.7	CHEMICAL MANAGEMENT	8
2.8	EXCAVATION PERMITS AND NATURAL AND CULTURAL RESOURCES	9
2.9	AIR EMISSIONS	9
3.0	ENVIRONMENTAL MANAGEMENT CONTROLS	10
3.1	ENVIRONMENTAL TRAINING	10
3.2	COMMUNICATION AND RECORDKEEPING	10

Table of Contents

4.0 REVIEW OF ENVIRONMENTAL CONTROL PLAN 11

5.0 REFERENCES 11

TABLE

1. Emergency Action Plans for RCRA Treatment, Storage, and Disposal Units. 3

ACRONYMS

BHI	Bechtel Hanford, Inc.
CERCLA	<i>Comprehensive Environmental Response, Compensation, and Liability Act of 1980</i>
CPT	cone penetrometer
DIS	Document and Information Services
EAP	emergency action plan
ECP	environmental control plan
ERC	Environmental Restoration Contractor
ERDF	Environmental Restoration Disposal Facility
FEC	Field Environmental Coordinator
IDW	investigation-derived waste
MOU	Memorandum of Understanding
OU	operable unit
PEL	Project Environmental Lead
RCRA	<i>Resource Conservation and Recovery Act of 1976</i>
SAP	sampling and analysis plan
STR	Subcontract Technical Representative
SWMII	specific waste management implementation instruction0
TRU	transuranic
TSD	treatment, storage, and disposal
WAC	<i>Washington Administrative Code</i>

1.0 OVERVIEW, PURPOSE, AND OBJECTIVES

1.1 PROJECT OVERVIEW

This environmental control plan (ECP) is applicable to investigation activities related to the assessment of waste sites and associated soil contamination in the 200 Areas of the Hanford Site. These activities include test pit excavation, drilling, drive casings, soil/water sampling, cone penetrometer sampling, geophysical surveying and logging, and waste management. As other activities are included in the investigations, they will be added in a revision of this ECP. Any well drilling, well development, or other groundwater activities that may be necessary will be covered under the *Environmental Control Plan for Groundwater Well Services* (Woolard 2000).

Investigation activities in the 200 Areas are conducted pursuant to operable unit (OU) work plans. The OUs addressed at this time in the ECP include the following:

- 200-CS-1
- 200-CW-5
- 200-TW-1 and 200-TW-2.

Some of the units included under this ECP are *Resource Conservation and Recovery Act of 1976* (RCRA) treatment, storage, and disposal (TSD) units and are subject to the interim status requirements for TSD units. During vadose zone investigation activities, transfer of project responsibilities (e.g., access control, logkeeping, and waste management) will be documented in a Memorandum of Understanding (MOU) between the Groundwater/Vadose Zone Project and Surveillance and Maintenance. Other units being investigated are RCRA past-practice and *Comprehensive Environmental Response, Compensation, and Liability Act of 1980* (CERCLA) past-practice units, which will be managed in accordance with the *200 Areas Remedial Investigation/ Feasibility Study Implementation Plan Environmental Restoration Program* (hereinafter referred to as the Implementation Plan) (DOE-RL 1999a). The Implementation Plan addresses the assessment of waste sites and associated soil contamination that resulted from past discharges of wastewater to the ground and the burial of solid waste in the 200 Areas. The Implementation Plan also discusses concepts and potential strategies for the eventual remediation of these waste sites.

1.2 PURPOSE

This ECP contains a summary of key existing environmental and regulatory requirements that are applicable to soil characterization and is intended to provide summary-level information to assist personnel in the field to maintain environmental compliance. This ECP highlights the concepts to be focused on, not how the concepts will be carried out. Because this ECP provides only an overview, the identified source documents (e.g., Bechtel Hanford, Inc. [BHI] procedures and work plans) should be consulted for detailed information regarding specific requirements. If discrepancies arise between this ECP and the source documents, contact the Project

Environmental Lead (PEL) and the Field Environmental Coordinator (FEC). The FEC is responsible for field implementation of this ECP.

1.3 OBJECTIVES

The objectives of this ECP are as follows:

- Identify environmental requirements applicable to investigation activities being conducted (or reasonably anticipated to be conducted) in the 200 Area vadose zone soil characterization.
- Be consistent with Integrated Environment, Safety, and Health Management System principles.
- Identify environmental controls to be used in the field.
- Identify responsible points of contact.

2.0 ENVIRONMENTAL REQUIREMENTS AND CONTROLS

Requirements and controls are described in terms of actions necessary to ensure protection of the environment and compliance with environmental regulations. Where applicable, associated timeframes and responsible parties are identified.

2.1 EMERGENCY RESPONSE

2.1.1 All Areas

In all cases, whether an operational emergency, natural phenomenon, or security emergency, personnel are to respond using the *SWIM* acronym:

- Stop what you are doing, placing equipment in a safe configuration.
- Warn others, which includes the following:
 - Warn all personnel in the vicinity.
 - Call 911 (or 373-3800 from a cellular telephone).
 - Inform the Building Warden.
- Isolate the area so others do not wander in.
- Minimize exposure by moving upwind and away from the incident.

2.1.2 Treatment, Storage, and Disposal Unit Areas

Emergency action plans (EAPs) are required at TSD units only. Emergency response in other areas is covered in health and safety plans. The EAPs identify the actions necessary to respond to an emergency condition, provide guidance and instruction for initiating emergency actions, and serve as a basis for training personnel in emergency actions. The EAP, used in conjunction with compliance with the emergency planning requirements of the *Hanford Emergency Management Plan* (DOE-RL 1999b), is intended to demonstrate compliance with the emergency planning requirements of *Washington Administrative Code* (WAC) 173-303, Subsections 340, 350, and 360.

- Table 1 lists each TSD addressed in this ECP and the associated EAP.
- The EAP shall be accessible to all project team members.
- Personnel must be trained in safety and emergency procedures in accordance with the EAP.
- Ensure that safety and emergency response equipment listed in the EAP is present and in locations that are specified in the plan.
- Notify the PEL/FEC of any change in emergency equipment condition or needs at the unit that differ from the EAP so the EAP can be revised.

Emergency response shall be conducted in accordance with applicable unit-specific health and safety plans and the TSD-specific EAPs, where applicable (Table 1).

Table 1. Emergency Action Plans for RCRA Treatment, Storage, and Disposal Units.

RCRA Treatment, Storage, and Disposal Unit	Emergency Action Plan
216-A-29	BHI-SH-03, Vol. 3, Section 11
216-S-10	BHI-SH-03, Vol. 3, Section 15
216-B-63	BHI-SH-03, Vol. 3, Section 19

2.2 SPILLS AND RELEASES

Spills are, by definition, an operational emergency and the response shall involve use of the *SWIM* acronym guidance. Spill/response reporting is to be conducted in accordance with BHI-EE-02, *Environmental Requirements*, Section 3.0, “Environmental Monitoring, Reporting, and Recordkeeping.”

- Stop the spill and contain the spilled material to the extent that it is safe to do so.
- Immediately report any accidental spill or unplanned release of a hazardous material regardless of quantity. Subcontract personnel are to contact the Subcontract Technical Representative (STR); Environmental Restoration Contractor (ERC) personnel are to contact the Area Field Superintendent.
- The Area Field Superintendent will make further notification to the ERC Spill/Release Single Point of Contact.
- The ERC Spill/Release Single Point of Contact will make a determination of the spill/release, will assist in determining appropriate response actions, and will advise the Project Manager for making regulatory agency notifications.
- Site-specific spill or release response is to be conducted in accordance with the EAPs.
- Spill/response reporting is to be conducted in accordance with BHI-EE-02, Section 3.0.

2.3 DRILLING, BOREHOLES, AND DRIVE CASINGS

Environmental requirements for drilling and boreholes are contained in BHI-EE-02, Section 14.0, “Drilling, Maintaining, Remediating, and Decommissioning Resource Protection Wells, GeoProbe and Geotechnical Soil Borings.” The following are key requirements:

- A unique well identification number must be obtained for each well, soil boring, or GeoProbe™ boring.
- Measures shall be taken to prevent contamination of groundwater resources from well and soil borings.
- Drilling and obtaining GeoProbe borings and soil borings shall be conducted in accordance with BHI-EE-02, Section 14.0.

2.4 SAMPLING AND GEOPHYSICAL LOGGING

2.4.1 General Sampling Criteria

Sampling activities will be conducted in accordance with the most current revision of the applicable sampling and analysis plan (SAP) and the following BHI procedures:

- BHI-FS-01, Vol. 1, *Field Support Administration*, Procedure 1.3, “Logkeeping Instructions”

™ GeoProbe is a registered trademark of GeoProbe Systems, Salinas, Kansas.

- BHI-EE-01, *Environmental Investigations Procedures*
 - Procedure 1.5, “Field Logbooks”
 - Procedure 2.0, “Sample Event Coordination”
 - Procedure 3.0, “Chain of Custody”
 - Procedure 3.1, “Sample Packaging and Shipping”
 - Procedure 3.2, “Field Decontamination of Sampling Equipment”
 - Procedure 4.2, “Sample Storage and Shipping Facility”
 - Procedure 7.0, “Geologic Logging”
 - Procedure 7.2, “Geophysical Survey Work.”

2.4.2 Specific Sampling Criteria

Regulatory documents and/or waste control plans have additional sampling requirements for some areas or activities. The following are key site-specific sampling requirements from the currently applicable OU work plans:

- 200-TW-1 and 200-TW-2 OUs
 - Field quality control samples will not be collected from zones within the boreholes that are expected to contain transuranic (TRU)-contaminated soils.
 - Drilling and sampling will stop when the water table is encountered.
 - With the exception of co-located duplicate samples, soil shall be transferred to a pre-cleaned stainless-steel mixing bowl, homogenized, and then containerized in accordance with the sampling procedure.
- 200-CW-5 OU
 - Field quality control samples will not be collected from the ditch sediment layer, which is expected to contain TRU-contaminated soils.
 - Drilling and sampling will stop when the water table is encountered.
 - Samples collected for volatile organic analysis shall be transferred directly from the sample liners to an appropriate container without mixing the sample.
 - With the exception of samples collected for volatile organic analysis, soil shall be transferred to a pre-cleaned stainless-steel mixing bowl, homogenized, and then containerized in accordance with the sampling procedure.
- 200-CS-1 OU
 - Drilling and sampling will stop when the water table is encountered.

- Samples collected for volatile organic analysis shall be transferred directly from the sample liners to an appropriate container without mixing the sample.
- With the exception of samples collected for volatile organic analysis, soil shall be transferred to a pre-cleaned stainless-steel mixing bowl, homogenized, and then containerized in accordance with the sampling procedure.
- During test pit sampling, if visible emissions cannot be controlled, the sampling activity will be postponed.

Sampling and analysis activities shall be conducted in accordance with the SAP applicable to the specific OU.

2.5 WASTE MANAGEMENT

2.5.1 General Waste Management Criteria

Waste management shall be conducted in accordance with an approved OU-specific waste control plan. Some of the key requirements from the waste control plans are as follows:

- All waste generated will be recorded in a logbook, including details such as the location and type of waste, the depth of sample, the date of initial placement into container, the date that the container was sealed, and the package identification number.
- Waste shall be segregated as directed for test pit soil or by the STR/Superintendent.
- Do not mix clean soil/material with contaminated soil.
- Ensure that waste is appropriately packaged, stored, labeled, and shipped in accordance with BHI-EE-12, *ERC Transportation Manual*, Procedure 3.0, “Packaging Hazardous Materials for Transportation”; Procedure 4.0, “Marking Hazardous Materials for Transportation”; and Procedure 5.0, “Labeling Hazardous Materials for Transportation.”
- Label/mark containers to identify risk and the unique identification number.
- Place waste in appropriate containers as directed by the Waste Transportation Specialist.
- Containerized material may be labeled as “environmentally controlled material.” This material poses no occupational hazard but cannot be released from the Hanford Site.
- Place waste containers at least 76 cm (30 in.) apart.
- Store wastes in a controlled area marked “DANGER – UNAUTHORIZED PERSONNEL KEEP OUT.”

- Decontamination water, rinsate, and other wastewater generated by the investigation activities covered by the ECP are not purgewater and, thus, cannot be managed under the purgewater strategy. However, the wastewater is investigation-derived waste (IDW) and shall be managed in accordance with the IDW strategy.
- Radiologically contaminated dangerous waste and IDW will be disposed at the Environmental Restoration Disposal Facility (ERDF) if the waste meets waste acceptance criteria. Any IDW that does not meet ERDF waste acceptance criteria will be held at the centralized storage area pending disposal at an appropriate facility. Nonradiologically contaminated dangerous waste may be shipped to an offsite facility.
- IDW managed longer than 6 months will have regulatory approval.
- TRU waste will be shipped to the Central Waste Complex and must be designated and characterized in accordance with BHI-EE-02, Section 12.0 and *Hanford Site Solid Waste Acceptance Criteria* (FDH 1998).

2.5.2 Specific Waste Management Criteria

Regulatory documents and/or waste control plans have additional specific waste management requirements for some areas or activities.

- A specific waste management implementation instruction (SWMII) shall be developed for the management of specific waste streams.
- Waste from 200-CS-1 OU activities shall be stored in areas marked as central waste container storage areas.
- All IDW, drill cuttings, decontamination fluid, and purgewater from the 216-A-29 Ditch will be managed as “U-133” listed hazardous waste. All waste containers generated from the 216-A-29 Ditch will be marked and labeled as “U-133” listed hazardous waste.
- Waste management activities are to be conducted in accordance with approved waste control plans and appropriate SWMIIs for the 200-TW-1 and 200-TW-2 OUs (DOE-RL 2000c), the 200-CW-5 OU (DOE-RL 2000b), and the 200-CS-1 OU (DOE-RL 2000a).

2.6 INSPECTIONS

Drums containing drill cuttings and decontamination fluids will be inspected monthly. Drums containing wastes carrying the “U-133” dangerous waste code shall be inspected weekly. These inspections will be documented on a Waste Container Storage Inspection Checklist (form BHI-FS-136). Interim status compliance inspections for the TSD units will be conducted by surveillance and maintenance personnel and is covered under a separate ECP for surveillance and maintenance activities.

2.7 CHEMICAL MANAGEMENT

Any chemicals stored or used at the OUs must be controlled. The chemical custodian for the facility is the facility administrator (as specified in the MOU), who will provide chemical management and control.

The ERC's chemical management program (BHI-MA-02, *ERC Project Procedures*, Procedure 9.3) governs the acquisition, tracking, storage, use, transportation, and final disposition requirements for chemicals.

- Acquisition
 - Identify the type and quantity if chemical needed.
 - Before ordering, determine if the chemical needed already exists on the Hanford Site.
 - The Field Superintendent/STR shall keep a record of receipt of site chemicals upon receipt.
 - Contact the PEL for review of the site-specific waste management instructions to determine if revisions are needed.
- Tracking
 - All chemicals shall be tracked from time of receipt to final disposition.
 - Quarterly inventories are required for all chemicals onsite.
- Storage
 - Appropriate storage shall be maintained for all chemicals onsite.
 - Each chemical shall be properly labeled. When chemicals are transferred from the manufacturer's container to a secondary container, that container will be labeled in accordance with the hazard communication label required in BHI-SH-02, Vol. 1, *Safety and Health Procedures*, Procedure 1.3, "Hazard Communication."
- Communication
 - The Field Superintendent/STR shall maintain a list of the type and quantity of the chemicals onsite..
 - The manufacturer's safety data sheet will be maintained for each chemical onsite.
- Use

- Each chemical will be used for its intended purpose.
- Waste minimization principles will be applied during use.

- Transportation
 - When shipping materials, consult the project shipping specialist for requirements.

- Final disposition
 - Chemicals will be recycled whenever feasible.
 - Unopened, unused chemicals will be returned to the warehouse for reuse.
 - Chemicals unfit for reuse will be designated as waste and will be managed accordingly.

Chemical management is to be conducted in accordance with BHI-EE-02, Section 3.0; BHI-EE-10, *Waste Management Plan*; BHI-EE-12; and BHI-SH-02, Vol. 1, Procedure 1.3.

2.8 EXCAVATION PERMITS AND NATURAL AND CULTURAL RESOURCES

Excavation permits are required for any excavations made below grade using mechanical equipment or any hand digging to a depth greater than 0.3 m (1 ft). As a step in the excavation permit process, cultural and ecological resource reviews are to be initiated by completing the Request for Cultural/Ecological Review form (BHI-EE-106), as required by procedure BHI-EE-02, Section 4.0, “Protection of Natural Resources on the Hanford Site.”

Excavation permits become part of the activity contract package. If an activity work package is not required, the originator of the permit must submit the excavation permit to Document and Information Services (DIS).

If ecological or cultural resource concerns are identified, contact the Field Superintendent/STR and the PEL to obtain assistance from the BHI Natural Resources and Risk Assessment group. Excavation permit preparation and cultural/ecological reviews are to be conducted in accordance with BHI-MA-02, Procedure 6.12, “Excavation Permit Procedure,” and BHI-EE-02, Section 4.0 and Section 5.0, “Preservation of Cultural Resources on the Hanford Site.”

2.9 AIR EMISSIONS

Air monitoring is required for drilling in high-risk drilling locations (e.g., locations within a crib, pond, or ditch). Existing near-facility air monitoring stations will be used whenever possible. During backhoe operations, water or a fixant can be used for dust control. Activities with the potential to emit radioactive and nonradioactive air emission must meet the requirements of BHI-EE-02, Section 8.0, “Air Quality,” and the applicable air monitoring plan.

Air emissions monitoring shall be conducted in accordance with the *Environmental Restoration Program ALARACT Demonstration for Drilling* (WDOH 2001), the applicable approved waste control plan, and BHI-EE-02, Section 8.0.

3.0 ENVIRONMENTAL MANAGEMENT CONTROLS

3.1 ENVIRONMENTAL TRAINING

Workers are required to have completed Occupational Safety and Health Administration 40-Hour Hazardous Waste Worker Training, 24-hour waste site experience, appropriate radiological training such as Radiological Worker II (Radiological Worker Refresher), and Hanford General Employee Training before starting work. Personnel transporting samples from the various 200 Area work sites to the designated sample storage facility or to the laboratories shall have completed U.S. Department of Transportation shippers' training. All site workers will be trained to the applicable site-specific waste management instructions and waste control plans, and the training will be documented.

All personnel working at TSD units must have the appropriate training for RCRA units as specified in BHI-HR-02, *ERC Training Procedures*, Procedure 1.5, "ERC TSD/Accumulation Area Training." Names and titles of the personnel performing vadose zone characterization activities must be included on the training list that is maintained by the Facility Administrator and submitted to ERC Training Department.

All personnel working at the TSD units must be trained to the respective applicable EAPs. It is the responsibility of the Field Superintendent to ensure that all site workers have received the required training. Training requirements are identified in BHI-HR-02, Procedure 1.4, "ERC Training Requirements," and Procedure 1.5.

3.2 COMMUNICATION AND RECORDKEEPING

The pre-job safety briefings and plan-of-the-day meetings shall be used to communicate other information pertinent to performing the work, such as requirements or limitations identified in permits, SAPs, and radiation work permits.

- Field activities and sampling and analysis information will be recorded in a logbook in accordance with BHI-FS-01, Vol. 1, Procedure 1.3, "Field Logbooks." Entries made in the logbook will be dated and signed by the individual making the entry.
- Chain-of-custody information shall be recorded in accordance with BHI-EE-01, Procedure 3.0, "Chain of Custody."

- The Field Superintendent/STR will ensure that the contingency plan, waste analysis plan, inspection plan, and training plan are revised when necessary, with the concurrence of the PEL.
- The Field Superintendent/STR will ensure that the plans are available to field personnel.
- Submit the following to DIS for inclusion in the operating record:
 - Waste container or other RCRA inspection checklists
 - Waste analysis profiles and certifications
 - Sampling results
 - Occurrence reports.

In accordance with BHI-EE-02, Section 3.0, documentation should be appropriately marked with the unit name and the words “OPERATING RECORD” either at the top of the sheet or on the cover sheet.

4.0 REVIEW OF ENVIRONMENTAL CONTROL PLAN

This ECP shall be reviewed/updated at least annually by the PEL. Updates will incorporate requirements from new OU work plans as they are approved and changes in applicable regulatory or operational requirements (e.g., changes in conditions, regulations, agreements, policies, and best management practices).

This ECP is a compliance tool for use in the field and does not replace ERC administrative control and procedures. Any environmental or regulatory compliance questions should be referred to the PEL.

5.0 REFERENCES

BHI-EE-01, *Environmental Investigations Procedures*, Bechtel Hanford, Inc., Richland, Washington.

BHI-EE-02, *Environmental Requirements*, Bechtel Hanford, Inc., Richland, Washington.

BHI-EE-10, *Waste Management Plan*, Bechtel Hanford, Inc., Richland, Washington.

BHI-EE-12, *ERC Transportation Manual*, Bechtel Hanford, Inc., Richland, Washington.

BHI-FS-01, Vol. 1, *Field Support Administration*, Bechtel Hanford, Inc., Richland, Washington.

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