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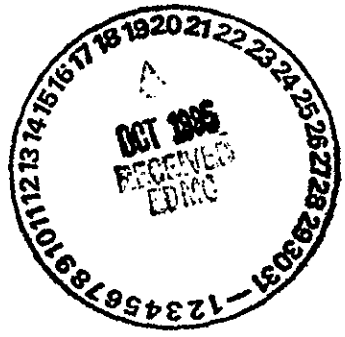
STATE OF WASHINGTON

DEPARTMENT OF ECOLOGY

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

October 16, 1995



Ms. Donna L. Powaukee
ERWM Manager
Nez Perce Tribe
P.O. Box 365
Lapwai, Idaho 83540-0365

Dear Ms. Powaukee:

Re: Response to Nez Perce Comments on the Proposed Plan for the 100-IU-1, 100-IU-3, 100-IU-4, and 100-IU-5 Operable Units

The Washington State Department of Ecology (Ecology) has received your letter dated August 8, 1995, regarding comments on the Proposed Plan for the 100-IU-1, 100-IU-3, 100-IU-4, and 100-IU-5 Operable Units. Ecology is the lead regulator for the 100-IU-3 and 100-IU-4 Operable Units. Your letter concurs with the no further action alternative at the 100-IU-4 Operable Unit, yet withholds concurrence for the 100-IU-3 Operable Unit pending resolution of your question regarding environmental characterization of demolished underground installations on the Wahluke Slope. 41861

As provided in Appendix C of the *North Slope (Wahluke Slope) Expedited Response Action Cleanup Plan (DOE/RL-93-47)*, in the mid-1970's, the approximately 20-foot deep bunkers at the missile sites were blown up, and demolition debris from the surrounding structures was placed in the resulting depression. Prior to this action, any salvageable material (e.g., piping, electrical lines, pumps, and other mechanical equipment) was removed from the site. As a cost saving measure, analogous site data was used to predict the probability of residual contamination on Wahluke Slope sites. The sampling of analogous sites on the Fitzner-Eberhardt Arid Lands Ecology Reserve (ALE) suggests low probability that contamination is associated with the demolished missile bunker structures on the Wahluke Slope. Therefore, it has been determined that further characterization at these sites is not necessary. 34376

USDOE performed pre-remedial action sampling of the NIKE missile bunker on the ALE in the summer of 1994. These bunkers remain largely intact. Results of these sampling activities are provided in *A Compendium of Field Reports for the Fitzner-Eberhardt Arid Lands Ecology Reserve Remedial Action, Hanford, Washington (DOE/RL-94-141)*. Dewatering sumps, one

located in each bunker, were the only areas that exhibited contamination. PCB contamination of up to 150 µg/100cm^2 was found on the walls of these sumps. Subsequent testing of the soils at three sump water discharge points, found the soil contained no evidence of PCBs, semi-volatile or volatile organics, or metals. It was determined the source of PCBs was probably the oil reservoirs of the existing operational sump pumps. As these pumps and their ancillaries have been removed from Wahluke Slope sites prior to demolition, the probability of contamination via this route is very low.

Additionally, on the ALE site, soil gas surveys were performed at the drain fields associated with the missile bunkers. As noted in the *North Slope (Wahluke Slope) Expedited Response Action Cleanup Plan (DOE/RL-93-47)*, Appendix F, these drain fields could have received solvents that were disposed of through the sewer system. The soil gas surveys gave negative results for volatile organics.

Based on this analogous site data, there is low probability of contamination associated with the demolished underground installations on the Wahluke Slope; therefore, Ecology believes that further characterization is unnecessary.

If you or your staff have any further questions regarding the Wahluke Slope remediation, feel free to contact me at (509) 736-3026.

Sincerely,

Gary H. Freedman
Nuclear Waste Program

GF:mf

cc: Glenn Goldberg, USDOE
Dennis Faulk, EPA
Administrative Record, 100-IU-3 Operable Unit