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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

7601 W. Clearwater, Suite 102 • Kennewick, Washington 99336 • (509) 546-2990

April 18, 1994

Ms. June M. Henning, Director
Waste Management Division
U.S. Department of Energy
P.O. Box 550
Richland, WA 99352-0550



Dear Ms. Henning:

Re: Contaminated Soil Disposal

The U.S. Department of Energy (USDOE) recently submitted to the Washington State Department of Ecology (Ecology) analysis of green contaminated soil discovered while constructing the W049 pipeline. Upon review of this data, Ecology agrees that the contamination appears to be primarily uranium oxide, and is the result of past practices on the Hanford site.

On January 20, 1994, USDOE submitted to Ecology a proposed policy for the handling of contaminated soil discovered during construction events. That policy is currently undergoing internal review, and Ecology's response should be returned to USDOE in the near future. No policy, however, has been agreed upon and the question has arisen concerning the proper disposal of contaminated soil currently being stored in thirty 55-gallon drums at the W049 construction site. Because of difficulties in originally locating the contaminated material, and the inability due to construction of the new pipeline to return the contaminated soil to the horizon in which it was located, Ecology requires that one of the two following alternatives for soil disposition be used:

- The 30 drums be sent to the Low Level Burial Ground for disposal.
- The soil within the 30 drums can be returned to the construction site as long as the area to which it is returned is completely surrounded by plastic (a plastic layer must be placed completely around the returned contaminated soil). This minimizes the spread of contamination from the soil to the surrounding environment and assures that the contaminated soil can be identified once Comprehensive Environmental Response Compensation and Liability Act (CERCLA) remediation of this operable unit occurs.

In addition, the information on this contamination must be entered into the WIDS database to assure that proper handling of the contamination occurs in the future.

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Ecology would like to emphasize that the handling of this material does not constitute a precedent for contaminated soil discovered during construction activities on the Hanford Reservation. The issue will be resolved in the near future, and all construction plans will be expected to follow the agreed upon policy.

If you have any questions, please contact either Nancy Uziemblo at (509) 736-3014, or Alex Stone at 736-3018.

Sincerely,



Alex Stone, 242-A Evaporator Unit Manager
Nuclear Waste Program



Nancy Uziemblo
CERCLA 200 Area Operable Unit Manager

AS/NU:sr

cc: Mr. Paul Pak USDOE
Richard Carlson WHC
Mark Carrigan, WHC
Michael Galgoul, WHC
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Tracy Yount, WHC
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Administrative Record

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Subject: CONTAMINATED SOIL DISPOSAL

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