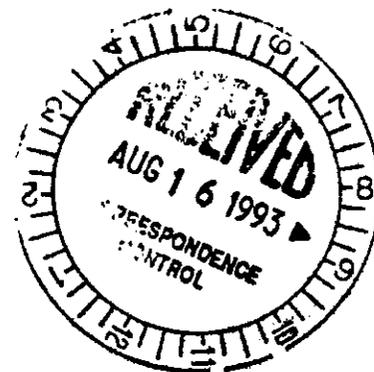


UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10 HANFORD PROJECT OFFICE  
712 SWIFT BOULEVARD, SUITE 5  
RICHLAND, WASHINGTON 99352

August 5, 1993



F. Robert Cook, Technical Analyst  
Environmental Restoration/Waste Management  
Program  
Yakima Indian Nation  
1933 Jadwin Avenue, Suite 100  
Richland, Washington 99352

Re: Pickling Acid Crib Expedited Response Action Proposal  
Comments

Dear Mr. Cook:

Thank you for taking the time to submit comments on the Pickling Acid Crib Expedited Response Action (ERA) Proposal. Public participation is a key part of the Hanford cleanup program.

Your comments indicate a desire to add information to the Engineering Evaluation and Cost Analysis (EE/CA) outlining how lead agencies are determined. The Tri-Party Agreement, Part Three, details how lead regulatory oversight is assigned. The RCRA Past-Practice Corrective Action process and the CERCLA process are functionally equivalent. Accordingly, the investigative process at any operable unit can proceed under either authority. In general, if the operable unit consists primarily of past-practice units (i.e., no TSD units or relatively insignificant TSD units), CERCLA authority is used. This is the case with the 100-IU-5 operable unit.

The Pickling Acid Crib is the only waste site located within the 100-IU-5 operable unit. Those areas around the crib are in a separate operable unit designated 100-IU-2. The 100-IU-5 operable unit was selected for an expedited response action for several reasons. The pickling acid crib was used in the early 1940s. Records indicate that the cribs were used for the disposal of nitric and hydrofluoric acid used in the pickling process, however little information is available on the chemical inventory. There was a potential that the cribs were a source of chromium and nitrate contamination in the groundwater and the three parties believed investigation was merited. This ERA was also considered because of the relative ease of remediation. In all likelihood, if contamination had been detected, a simple removal would have occurred. The sampling data taken at this site indicate that no residual contamination is contained in the vadose zone therefore no remediation of this site will occur. The EE/CA contains all the sampling data that was used to make this determination. The groundwater will be investigated with the 100-IU-2 operable unit. The landlord cleanup activities at

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August 5, 1993

this site will be limited to eliminating tripping hazards. The area around the pickling acid cribs contains native plants and it was the concern of the three parties that any further landlord action would do more harm than good.

You state in a comment that a Natural Resource Damage Assessment (NRDA) should be conducted at this site. The EPA agrees with this observation. However, the NRDA for Hanford is just now being formulated. As the process is developed, the Pickling Acid Cribs will be included in the assessment.

Again, thank you for taking the time to review the document. If you have any further questions or concerns, please call me at (509) 376-4919.

Sincerely,



Pamela S. Innis  
Operable Unit Manager

cc: Steve Wisness, DOE  
Paul Pak, DOE  
Darci Teel/Jeff Phillips, Ecology  
Becky Austin, WHC  
Administrative Record Pickling Acid Cribs (100-IU-5)

AUG 1993  
RECEIVED  
Becky A. Austin

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Confederated Tribes and Bands  
of the Yakima Indian Nation

Established by the  
Treaty of June 9, 1855

August 3, 1993

Ms. Pamela Innis  
United States Environmental Protection Agency  
712 Swift Blvd. Suite 5  
Richland, WA 99352

Subject: WHITE BLUFFS PICKLING ACID CRIBS EXPEDITED RESPONSE  
ACTION; ENVIRONMENTAL HAZARDS AND REMEDIATION  
OPTIONS; COMMENTS ON--

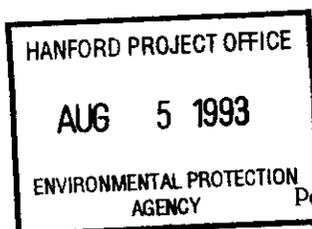
Dear Ms. Innis:

Thank you for the opportunity to comment on the White Bluffs  
Pickling Acid Cribs Expedited Response Action.

As you may know, the Confederated Tribes and Bands of the Yakima  
Nation (YIN) have reserved Treaty rights regarding the usage of  
various natural resources on the Hanford Reservation and is  
interested and concerned with respect to the health and  
environmental hazards and alternatives to remediate these hazards.

The following are supplementary matters affecting remediation of  
100-IU-5:

1. As stated in the Engineering Evaluation/Cost Analysis (EE/CA),  
the Environmental Protection Agency (EPA), Washington State  
Department of Ecology (Ecology), and the Department of Energy (DOE)  
have agreed to share joint responsibility and regulatory oversight  
of 100-IU-5, including the Acid Pickling Cribs. The EE/CA should  
include a description of the process of how a lead agency is  
designated and whether the designation affects the selection of  
processes used to involve interested parties and hence the decision  
regarding remediation.
2. The EE/CA should describe why the White Bluffs Acid Pickling  
Cribs were delineated for separate consideration from other  
contamination zones in the 100-IU-5 area. For example, the Acid  
Pickling Cribs are surrounded by the JA Jones Construction Pit #2,  
White Bluffs Landfill, and East White Bluffs Landfill. Hence, the  
EE/CA should consider the whole 100-IU-5 area for remediation in  
order to determine the cumulative contamination and the cumulative  
affects in the area.



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3. The EE/CA should explain how the Tri-Party members reached the conclusion to administer the Environmental Engineering/Cost Analyses (EE/CA) tool in remediation investigation, data collecting, and remediation alternatives. Further, the EE/CA does not indicate why this is an expedited response action. An Expedited Response Action usually requires some type of exigency or emergency situation involving health risks or serious and continuing contamination of the environment. The EE/CA should state what regulations it satisfies (besides 40 CFR 300.415(b)(4)(i)), and whether it satisfies any other of the remediation alternatives.

4. In addition to lead agency selection, the EE/CA should include whether the Tri-Party members signed a Superfund Memorandum of Agreement (SMOA) on this remediation area. And it should also include whether other options or decisions by the Tri-Party members are to be considered at a later date and affect the remediation of 100-IU-5.

5. The surveys and investigations of 100-IU-5 should include a Natural Resource Damage Assessment. This will provide invaluable information; will provide a backdrop for the level of cleanliness necessary to avoid injury; and will provide a base for selecting remediation alternatives.

6. Dust emissions during remediation activities should either be eliminated or minimized so as to not contaminate surrounding and otherwise clean soil, provide a safe working environment for workers, and protect the surrounding natural resources.

7. EPA should consider utilizing new technology in remediation and removal. This is guidance expressed in the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), section 40 CFR part 300.430(a)(1)(iii)(E).

8. Prior to initiating the remediation process, an archeological and cultural survey should be conducted to preserve and protect any archeological sites, cemeteries, or cultural items that may exist in this area.

9. The EE/CA should state whether there is vadose zone or groundwater contamination and what methods were utilized to make that determination.

10. Re-vegetation of the area with native plants should be accomplished. The Yakima Indian Nation should be consulted on the details of the re-vegetation plans to assure introduction of desirable species is accomplished.

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Additional detailed comments are contained in Attachment A to this letter.

Sincerely,



F. R. Cook, Technical Analyst  
Environmental Restoration/Waste Management Program  
Yakima Indian Nation  
1933 Jadwin Avenue Suite 110  
Richland, WA 99352

ATTACHMENT A: DETAILED COMMENTS TO YIN LETTER OF AUGUST 3, 1993  
REGARDING HANFORD PICKLING ACID CRIBS REMEDIATION

cc: John Wagoner, DOE/RL  
Jim Warner, DOE/EM (fax)  
Thomas Grumbly, DOE/EM  
Mary Riveland, WDOE  
EPA Region 10 Administrator  
K. Clarke, DOE/RL  
Jim Peterson, DOE/RL (5YP)  
R. Jim ER/WM, YIN (fax)  
M. Dick Squeochs, YIN  
Carroll Palmer, YIN  
Mike Bauer, YIN  
C. Sanchey, YIN  
Washington Gov., M. Lowry  
U. S. Congressman, J. Inslee  
U. S. Senator, P. Murray  
Joe Stohr, WA Dept of Ecology  
David Berick  
Michael Campbell

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ATTACHMENT A: DETAILED COMMENTS TO YIN LETTER OF AUGUST 3, 1993  
REGARDING HANFORD PICKLING ACID CRIBS SLOPE REMEDIATION

1. Pickling acid levels in the groundwater could be excessive as a result of disposal practices. Each of the cribs should be individually surveyed for acids; and, if any excessive acid is found in the soils, the groundwater should also be surveyed to determine the need for groundwater remediation. Surveys should be designed to assure that there is reasonable assurance that excessive acid does not exist. Groundwater in the area should, in general, be remediated to allow use for domestic purposes or for watering livestock, consistent with Treaty usage rights pertaining to the pasturing of stock.
2. All carcinogenic contaminants if found should be removed from the area or destroyed, including petroleum hydrocarbons and asbestos in order to provide safe access to YIN members exercising usage rights under the Treaty of 1855.
3. A flora and fauna survey should be conducted where ground disturbance will occur. We request that the YIN be notified of these surveys so as to allow YIN participation.
4. Although the Acid Pickling Cribs remediation may not directly affect the salmon spawning on the Columbia, care during remediation activities should be taken to avoid river pollution, and disturbance of the wildlife in the area.

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# CORRESPONDENCE DISTRIBUTION COVERSHEET

Author

Addressee

Correspondence No.

P. S. Innis, EPA

F. R. Cook

Incoming: 9305059

Subject: PICKLING ACID CRIB EXPEDITED RESPONSE ACTION PROPOSAL COMMENTS

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		H. E. McGuire, Level 1	B3-63	
		R. D. Wojtasek, Assignee	H6-27	
	(Original)	EPIC	H6-08	



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