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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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

June 10, 1998

Ms. Linda Bauer
U. S. Department of Energy
P.O. Box 550
Richland, WA 99352



Dear Ms. Bauer:

Re: Non-Radioactive Dangerous Waste Landfill (NRDWL)

On April 17, 1997, the Washington State Department of Ecology (Ecology) issued a Notice of Deficiency (NOD) relating to the Closure/Post Closure Plan for the NRDWL to the U.S. Department of Energy (USDOE). Ecology requested that USDOE respond to the NOD by October 20, 1997. USDOE and Ecology discussed the NOD comments before the due date and it was agreed between the two parties that a soil gas survey would be performed at NRDWL before USDOE responded to the NOD.

During August 1997, a limited soil gas survey was conducted. The objective of the soil gas survey was to collect data to: 1) assess vertical and lateral distribution of Volatile Organic Compounds (VOC), 2) assess potential impacts to the groundwater, and 3) assess the mobility of the contaminants. Ecology reviewed the results of the soil gas survey. The data indicated that the carbon tetrachloride and chloroform are increasing in concentration with depth at locations directly under the chemical trenches, indicating that contaminant migration is vertically downward through the vadose zone to depths near the water table.

The comments of Ecology on the soil gas survey report were formally communicated to USDOE on October 23, 1997. On January 27, 1998, USDOE responded to the letter and expressed the following position: **“considering the availability of data in the 200 Areas, the data at NRDWL is more extensive than at most other waste sites and USDOE considers the collection of data at other waste sites to be of higher priority than collecting additional data at NRDWL”.**

It is Ecology's position that the limited data collected during the August 1997 soil gas survey clearly indicates that NRDWL poses a threat to the groundwater. Considering this, a more detailed investigation of NRDWL must be given a high priority in the 200 Area implementation plan.

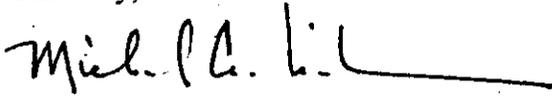
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Ecology requires that a detailed soil and groundwater survey should be conducted at NRDWL no later than June 30, 1999. Details of the survey should be discussed with and agreed upon by Ecology staff before implementation of the survey.

In the event the survey is not completed by the stipulated date, Ecology may have to pursue other regulatory avenues to ensure compliance and protection of soil and groundwater.

If you have any questions, please contact Shri Mohan at (509) 736-5704 or Laura Cusack at (509) 736-3038 of my Kennewick staff.

Sincerely,

A handwritten signature in black ink that reads "Mike Wilson". The signature is written in a cursive style and is followed by a horizontal line.

Mike Wilson, Program Manager
Nuclear Waste Program

MW:SM:ch

cc: Doug Sherwood, EPA
Bryan Foley, USDOE
R.A. Holten, USDOE
Administrative Records: NRDWL

bcc: Steve Alexander, Ecology
Laura Cusak, Ecology
Jack Donnelly, Ecology
Moses Jaraysi, Ecology
Stan Leja, Ecology
Shri Mohan, Ecology
Ron Skinnarland, Ecology
Steve Skurla, Ecology
Jerry Yokel, Ecology
Central Files: NRDWL