

# START

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Agency

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9305543



March 29, 1993



Eric D. Goller  
U.S. Department of Energy  
P.O. Box 550, A5-19  
Richland, Washington 99352

Re: EPA Comments on the 100 Area Excavation Treatability Test *26732*  
Plan; Decisional Draft

Dear Mr. Goller:

Enclosed are the comments from the U.S. Environmental Protection Agency (EPA) on the 100 Area Excavation Treatability Test Plan; Decisional Draft.

For your convenience, a copy of these comments have been transmitted to you electronically via the HLAN.

Please contact me if you have any questions. I may be reached at (509) 376-8631.

Sincerely,

Dennis A. Faulk  
Operable Unit Manager

Enclosure

cc: Audree DeAngeles, PRC  
Becky Austin, WHC  
Jack Donnelly, Ecology  
Brian Drost, USGS  
Rich Hibbard, Ecology  
Administrative Record (100 Aggregate Area Operable Unit)

9312972-2152



**EPA Comments on the 100 Area Excavation Treatability Test Plan**

**comment: page 1 paragraph 1**

The Treatability Study Program Plan is an internal DOE document and this should be noted if this reference is going to be used.

**comment: page 1 bullets**

The studies being conducted at INEL on excavation practices should be included in this document or if the information is not available at this time a reference should be made that INEL information will be included as appropriate.

**comment: page 1 last paragraph**

This paragraph discusses the purpose and scope of this test plan. In addition to field and laboratory analysis for radionuclides this test must also consider analysis for the other contaminants of concern in the 100 area. (ie metals, VOA's, SemiVOA's, and anions)

**comment: page 2 bullets**

A paragraph should be added to this section to describe how the work done under this test will feed into later treatability tests.

**comment: page 3 middle of page**

This section discusses the site selected for the test. WHC and DOE selected the 116-F-4 crib for the site of the test. EPA does not agree with this location as it does not contain many of the contaminants of concern for the 100 areas. A site or sites must be selected that contain adequate inventories of the major contaminants of concern.

**comment: page 7 2nd paragraph**

This paragraph discusses a VE study conducted by Los Alamos on dust control in the 100 B/C area. This study was done with no regulator involvement. Therefore EPA requests that DOE transmit a copy of the report for our use.

**comment: page 6 last paragraph**

This section discusses dust control. The technologies presented in this section appear to be well proven and therefore unnecessary. Additional rationale should be provided on why these technologies were chosen while excluding others.

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**comment: page 8 3rd paragraph**

No rationale is given why the mobile lab is not being utilized for this test. EPA recommends that this test plan be revised to include the use of the mobile lab.

**comment: page 28 1st paragraph**

This paragraph discusses the depth of the excavation. A statement is made that if 2 lifts in a row are clean the excavation will be terminated. Records show that in some waste sites the contamination is found in lenses, therefore, by terminating after 2 lifts there is a possibility that contamination could be left in place.

**comment: appendix A**

This section should discuss the effects of changing climatic conditions on the various aspects of the test.

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4517-262168

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**Subject:** EPA Comments on the 100 Area Excavation Treatability Test Plan;  
Decisional Draft

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