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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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

May 19, 1997

Mr. John Sands
U.S. Department of Energy
P.O. Box 550
Richland, WA 99352



Dear Mr. Sands:

Re: Comments on Phase I Feasibility Study for the Canyon Disposition Initiative 47135

The Washington State Department of Ecology (Ecology) concurs with the comments provided to the U.S. Department of Energy (USDOE) by the U.S. Environmental Protection Agency (EPA). Additionally, Ecology and EPA will be attempting to answer many of the regulatory and technical issues provided by the Hanford Advisory Board Waste Management and Environmental Restoration Committees.

Ecology's primary areas of concern are:

1. The alternatives listed may need further evaluation, such as, other alternatives or combinations thereof based on stakeholder input. Ecology believes more discussion is necessary to ensure a comprehensive list of alternatives is agreed to prior to proceeding with Phase II of the Feasibility Study.
2. Ecology does concur with USDOE on removing alternative 5 based on environmental protection and not capping clean fill.
3. USDOE needs to evaluate and consider other disposal options besides the Environmental Restoration Disposal Facility (ERDF).
4. Ecology believes that following appropriate environmental regulations is prudent, and does not believe that any single regulation will allow this initiative to succeed. Ecology does concur with using the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) during the screening of alternatives, but the use of other regulations may be appropriate when evaluating waste disposal.

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5. More discussion is necessary on the types of wastes to potentially be disposed. Ecology supported this initiative from the onset primarily based on waste generated from the cleanup of 100 and 300 area burial grounds which contain large hardware and other waste that will likely not meet the waste acceptance criteria for the ERDF. This initiative provided a mechanism for "getting on with cleanup" along the river and provided for potential cost savings in disposal. This type of discussion is necessary when performing more detailed analysis of the alternatives.

6. While Ecology reviews cost data closely, the detailed cost information provided in Appendix D does not contain the assumptions necessary to verify the numbers provided. Secondly, Ecology will use costs only as a modifying criteria, and uses protection of human health and the environment as the primary driver in selecting a preferred alternative. Therefore, Ecology will not dismiss any alternative(s) in Phase I based solely on cost.

Ecology looks forward to working with USDOE, EPA, and the Hanford Advisory Board committees as we progress in this initiative. There still remains many regulatory and technical issues to resolve. If you or your staff have any questions, please contact Mr. Bob Julian at (509) 736-5702 or me at (509) 736-3013.

Sincerely,



Jack W. Donnelly
Nuclear Waste Program

JWD:sdb

cc: Pam Innis, EPA
Linda Bauer, USDOE
Rich Holten, USDOE
Michael Hughes, BHI
Steve Liedel, BHI