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STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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Incoming: 9300223B

December 29, 1992



Mr. Ron D. Izatt, Acting Director  
Environmental Restoration Division  
U.S. Department of Energy  
Richland Operations  
P.O. Box 550  
Richland, WA 99352-0550

Dear Mr. Izatt:

You have already received one response to your October 29, 1992, letter in which you requested our position concerning the utilization of municipal sewage sludge (biosolids) for a soil amendment. In the letter of November 9 signed by Dave Nylander, we requested additional information which will help us assess the technical merits of your proposal. I have prepared an additional analysis of some of the policy questions that you have asked, which may assist you in determining the pros and cons of using biosolids for the purposes you intend.

First we think it is appropriate to consider the use of biosolids for the purposes you intend. There are some potential liability risks in doing so, but we also recognize the need to constructively utilize biosolids in this fashion.

We cannot provide you with the type of assurance that you have requested in your October 29 letter. There are too many variables which might affect our decision concerning whether or not the application of biosolids exacerbated the existing cleanup situation. For example, inappropriate application rates could be a legitimate reason for requiring some subsequent cleanup if the cumulative amount of some contaminate exceeded cleanup standards. Or, there could be a significant error in the sludge analysis that could lead to the need for undertaking some sort of remedial action. Ecology is continuing to review this matter in light of similar concerns expressed by other parties at other sites.

We do not see the above as being an argument against the utilization of biosolids in this situation. The kind of problems we foresee could occur with

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the use of any agricultural product. In other words, misapplication or a mistake in product formulation could occur with commercial products too.

In summary then, we believe the proposal to apply biosolids in this fashion is appropriate, and we would encourage you to continue to work on the details with the Kennewick Office. We reaffirm that public involvement in this decision is necessary. We are prepared to evaluate the options in terms of the net environmental benefits to be derived, and we presently see no greater risk for you in proceeding with this option than we would in using commercial agricultural products for the same purpose. In all likelihood, the cleanup actions to be taken at the proposed application locations will be of such a nature that the application of the biosolids shouldn't make any difference one way or the other. You do incur some risks, but we believe these risks to be minor and controllable if the application process is developed collaboratively with our assistance. I hope this satisfies your concerns. If not, please feel free to discuss this with us further.

Sincerely,



David B. Jansen, P.E.  
Hanford Project Manager  
Nuclear and Mixed Waste Management Program

DBJ:dr

cc: Allan Harris, Energy ✓  
Dave Nylander, Ecology  
Jerry Hensley, Ecology



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Author

Addressee

Correspondence No.

David B. Jansen, Ecology

Ron D. Izatt, RL

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Subject: UTILIZATION OF MUNICIPAL SLUDGE FOR SOIL AMENDMENT

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