United States
Environmental Protection
Agency

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EPA

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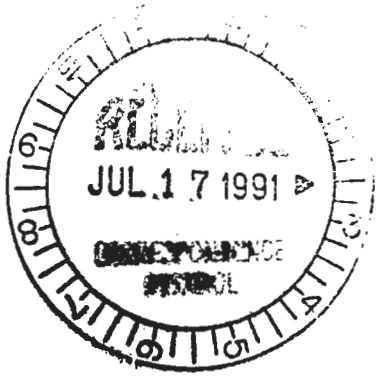

Robert K. Stewart
Unit Manager
U.S. Department of Energy
P.O. Box 550, A5-19
Richland, Washington 99352

Re: Comments on EII 4.2 and EII 5.4

Dear Mr. Stewart:

The Environmental Protection Agency has completed the review of EII 4.2 "Interim Control of Unknown Suspected Hazardous and Mixed Waste" and EII 5.4 "Field Decontamination of Drilling, Well Development and Sampling Equipment". The enclosed comments reflect the review.

Please review the comments and contact me at 376-4919 with any questions or concerns. We anticipate meeting with you to discuss the incorporation of the comments from both EPA and Ecology.

Sincerely,

Pamela S. Innis
Unit Manager

Enclosure

cc: Larry Goldstein/Richard Hibbard, Ecology
Dave Nylander, Ecology
Tim Veneziano, WHC
Steve Wisness, DOE

INTRODUCTION

The Westinghouse Hanford Company has developed the *Environmental Investigations and Site Characterization Manual* made up of specific environmental investigations instructions (EII) for the Hanford Site. The manual is to be used in conjunction with the various remedial investigation and feasibility study work plans. This document contains technical review comments on revised EII 4.2 and EII 5.4. Comments presented below are separated into general and specific categories.

EII 4.2, REV 2 - INTERIM CONTROL OF UNKNOWN, SUSPECTED HAZARDOUS AND MIXED WASTE

General Comments

The rationale for categorizing wastes as "unknown" or "suspected hazardous" is unclear. Sections 6.3 and 6.4 indicate that the difference between a waste designated as "unknown" and one designated as "suspected hazardous" is based on pH and detection of organic vapors by field instruments. These sections also state that drums of unknown waste should be stored at a collection area, while drums of suspected hazardous waste should be stored at a satellite storage area until the 55-gallon limit is reached. When the limit is reached, the drums will be taken to a temporary 90-day storage facility. Generally, wastes generated during environmental investigations are treated as potentially hazardous waste or suspected hazardous waste, regardless of field readings, until laboratory analysis is completed and a final waste designation can be made. It may be more appropriate to keep drums generated during one investigation (or from one site or operable unit during a specific field activity) together in one location, rather than dividing them between two separate areas based on field screening data. This procedure would minimize confusion and provide an easier way to account for all of the drums generated during a specific investigation or period of field activity.

Several issues of concern in EII 4.2 have been resolved in the ongoing meetings between EPA, Ecology, DOE and WHC concerning EII 4.3 "Investigation Derived Waste". To eliminate excessive comments on this EII, it is suggested that pertinent recommendations/decisions resolved in the work group for EII 4.3 be incorporated.

Specific Comments

1. Comment: Section 3.0, p. 1

   The definition of accumulation start date should be consistent with 40 CFR 262.34.

2. Comment: Section 3.0, p. 2

Terminology should be consistent with other EII's. The term "facility generator" has been changed in EII 4.3 to "investigation derived waste coordinator". "Facility generator" is a misleading term and should be changed.

3. Comment: Section 4.0, pp. 3-6

The responsibilities of Solid Waste Engineering pertaining to this EII shall be defined in this section.

4. Comment: Section 4.5, p. 6

The term "Function Manager" used in this section should be defined elsewhere in the EII.

5. Comment: Section 5.1, p. 7, item 2

The sentence leads the reader to believe that drill cuttings will only be bagged and not drummed. Clarify the sentence to say that the drums will be lined with plastic.

6. Comment: Section 6.0, p. 8, first paragraph

All materials (saturated or unsaturated) generated within a waste area during environmental investigations should be containerized and handled as suspected hazardous waste, regardless of field instrument readings, until appropriate hazardous waste determination can be completed by a laboratory.

7. Comment: Section 6.0, p. 8, fourth paragraph

Decontamination fluid generated during environmental investigations should not be designated as nonhazardous until supporting laboratory analytical results are received.

8. Comment: Section 6.1, p. 8, item 2

It should be clarified as to when liners are "optional".

9. Comment: Section 6.4, p. 11, item 1(a)

The "suspected hazardous waste" field determination for freshly excavated soils should not be limited to the threshold of 10 parts per million (ppm) above background at a distance of 1 foot. Any detection registered on a field instrument should necessitate the treatment of those materials as suspected hazardous waste.

10. Comment: Section 6.9, p. 12, items f and g

Wet soils/slurries and decontamination fluids shall be disposed of outside the waste area.

11. Comment: Section 6.9, p. 14, item 1(g)

It may be appropriate to discharge unregulated decontamination fluid to the sanitary sewer system.

EII 5.4, REV 3 - FIELD DECONTAMINATION OF DRILLING, WELL DEVELOPMENT AND SAMPLING EQUIPMENT

General Comments

This EII appears to focus on decontamination of heavy equipment such as the drilling and well development equipment. However, it does not address smaller pieces of sampling equipment, such as split spoons, trowels, and glassware, as implied by the title. The second paragraph of Section 6.0, page 4, indicates that the procedure for decontamination of sampling equipment is addressed in EII 5.5 - 1706 KE Laboratory Decontamination of RCRA/CERCLA Sampling Equipment. Laboratory decontamination usually addresses glassware such as sampling jars but does not address split spoons, trowels, and other smaller pieces of field equipment. Such equipment is usually decontaminated by field personnel and may involve hand-scrubbing with detergents and solvent and deionized water rinses. The decontamination procedures for smaller field equipment should be included in EII 5.4.

Specific Comments

1. Comment: Section 6.0, p. 4, second paragraph

Drilling equipment that is contaminated with constituents, other than radiological contaminants, shall be decontaminated on an approved decon pad equipped with a collection system.

2. Comment: Section 6.1, pp. 4 and 5

General provisions shall be listed for decontamination procedures in adverse conditions. For example, should materials be covered immediately after cleaning in windy conditions? What should be done in freezing conditions?

3. Comment: Section 6.2.1.1, p. 6, first paragraph

The procedure used to determine whether decontamination has been "successful", as indicated in this section, should be provided.

4. **Comment:** Section 6.2.3, p. 8, second paragraph

EII 4.2 does not state that decontamination water may be disposed of on-site if field screening results do not detect radioactive or hazardous constituents. Section 6.9 of EII 4.2 indicates that the chemical waste disposal analysis must be completed before a final waste designation and an appropriate disposal method can be determined. The use of field instrumentation may be inadequate to determine if the decontamination water is nonhazardous. This paragraph is misleading and should be deleted.

CORRESPONDENCE DISTRIBUTION COVERSHEET

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Subject: COMMENTS ON EII 4.2 AND EII 5.4

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