



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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March 4, 1992



Mr. Steven H. Wisness
Hanford Project Manager
U.S. Department of Energy
P.O. Box, 550 A5-19
Richland, WA 99352



Re: Expedited Responses Action Planning Proposals and Implementation

Dear Mr. Wisness:

On January 22, 1992, a meeting was held to discuss the selection of new Expedited Response Actions (ERA). The Washington State Department of Ecology (Ecology) and the U.S. Environmental Protection Agency (EPA) assumed the task of identifying candidate sites for planning proposal preparation, and identification of lead regulatory agency.

The primary reasons to perform ERAs are to minimize or eliminate the potential for release of hazardous substances and/or radionuclides in the environment and to initiate actions consistent with anticipated remedy selections. The final remedy selection would be made after completion of a Remedial Investigation/Feasibility Study (RI/FS) or a RCRA Facility Investigation/Corrective Measures Study (RFI/CMS).

On December 12, 1991, a meeting was held to discuss selection of new ERAs. In this meeting, the U.S. Department of Energy (DOE) and Westinghouse Hanford Company (WHC) provided EPA and Ecology with a list of twenty-two (22) candidate sites. In addition, DOE and WHC were seeking approval to proceed with EE/CA preparation for the 300 Area Burial Grounds. Based on this meeting and a continuing dialogue between Ecology, EPA, DOE, and WHC, four (4) sites from the candidate list have been selected for planning proposal preparation. In addition, we request DOE submit planning proposals for two additional sites that were drafted previously for DOE, but as yet have not been submitted to Ecology and EPA.

Ecology and EPA prefer to delay initiation of an ERA on the 300 Area Burial Grounds. With the use of test pits in both the liquid disposal sites and the burial grounds, it appears the schedule for completion of RI/FS activities in 300-FF-1 may be accelerated. In addition, treatability tests planned for this year may identify appropriate means for remediating contaminated sediments from the liquid disposal sites as well as the burial grounds. Early completion of these investigations could result in a final Record of Decision for the 300-FF-1 Operable Unit earlier than projected. Ecology and EPA prefer

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this course of action because it would potentially eliminate the need to handle waste from the burial grounds twice (once as part of the ERA and again as part of the final remedy).

Ecology and EPA have selected the following four sites for planning proposal preparations:

Sodium Dichromate Barrel Disposal Landfill in 100-IU-4 Operable Unit

The sodium dichromate barrel disposal site in the 100-IU-4 Operable Unit was selected in part due because this is the only facility located within the 100-IU-4 Operable Unit. Also, early remedial action at this operable unit may abate the potential of more extensive environmental degradation. Any ground water contamination from the sodium dichromate barrel site would be addressed as part of the 100-HR-3 Operable Unit. Removal of drums and contaminated sediments from this site may completely remediate the 100-IU-4 Operable Unit or may result in a no further action record of decision. This ERA would be designated as an Ecology lead site due to its location within the 100-HR-3 ground water operable unit for which Ecology is also the lead regulatory agency. An ERA at the sodium dichromate barrel disposal site should not require extensive planning or characterization prior to initiation and therefore field work should begin in fiscal year 1992.

U.S. Bureau of Reclamation 2,4-D Burial Site in 100-IU-3 Operable Unit

The U.S. Bureau of Reclamation 2,4-D burial site in the 100-IU-3 Operable Unit was also selected in part because it is the only documented hazardous waste disposal area located north of the Columbia River on the Hanford Site. In addition, this site is one of the few waste sites where DOE does not control access. Removal of drums and contaminated sediments from this site could eliminate the primary source of hazardous waste from this part of the Hanford Site and enhance public safety. The north slope area of the Hanford Site has been of particular interest to Ecology due to public access and the existing lease agreement between DOE and the Washington State Department of Fish and Wildlife. Ecology would be designated lead regulatory agency for both this ERA and the 100-IU-3 Operable Unit.

White Bluffs Pickling Acid Crib in 100-IU-5 Operable Unit

The White Bluffs pickling acid crib in the 100-IU-5 Operable Unit represents a significant source of acidic metal waste solution. This waste was generated from the final cleaning of reactor cooling pipes prior to installation in Hanford's eight single-pass reactors. These liquid disposal sites are located approximately one mile west of the 100-F Area near the old White Bluffs town site. Again, this site represents the primary source of contamination within the 100-IU-5 Operable Unit and a removal action at this facility will likely limit

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the need for and extensive investigation through an RI/FS. Since little is known about the extent of contamination associated with the White Bluffs pickling acid crib, some degree of characterization will likely be required as part of an ERA at this site. Due to its location upgradient of 100-F Area, EPA would be designated as lead regulatory agency for both this ERA and the 100-IU-5 Operable Unit.

100-IU-1 River Rail Wash Pit and 600 Area Army Munitions Burial Site

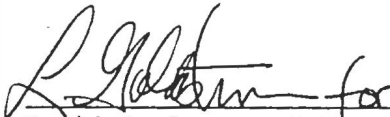
The 100-IU-1 operable unit contains two units. The riverland railroad car wash pit was decontaminated in 1963, and subsequently released from radiation zone status. Site records indicate that all items were removed from the munitions burial site in 1986. These sites are both located west of Highway 240 and lack the access controls present at nearly all other past practice sites at Hanford. EPA will be lead agency for this ERA and the 100-IU-1 Operable Unit. This presents the potential opportunity to reach a decision to take no further action at an operable unit after performing a confirmatory investigation. We expect that the entire investigation could be done as part of the ERA. If that is the case, the ERA would be followed by administrative steps to reach a final ROD.

Planning proposals for two additional sites are already drafted, but not released. These are for the 100 Area river outfall pipes and the 618-11 burial ground. These planning proposals should be transmitted to Ecology and EPA without delay. The regulatory lead agency will be identified for these proposals in the notice to proceed with EE/CA preparation.

Should you have any questions about the selection of candidate sites for planning proposal preparation or implementation, please contact either Steve Cross of Ecology (206) 459-6675 or Doug Sherwood of EPA (509) 376-9529.

Sincerely,

Paul T. Day
Hanford Project Manager
EPA Region 10



David B. Jansen, P.E.
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Subject: EXPEDITED RESPONSE ACTION PLANNING PROPOSALS AND IMPLEMENTATION

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