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United States
Environmental Protection
AgencyRegion 10
Hanford Project Office
712 Swift Boulevard, Suite 5
Richland WA 99352

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July 12, 1991



Louise Wilson Noyes
Columbia River United
P.O. Box 912
Bingen, Washington 98605

Re: Expedited Response Action Proposal for the 316-5 Process
Trenches

Dear Ms. Noyes:

The U.S. Environmental Protection Agency (EPA) received your
commented dated June 28, 1991 on the Expedited Response Action
Proposal for the 316-5 Process Trenches on July 2, 1991.

We greatly appreciate the fact that your organization was
concerned enough to comment on the proposal. Public involvement
is an integral part of the environmental restoration program at
the Hanford facility. Your comments on the proposal were well
received, in fact, many of them were identical to concerns that
EPA and the Washington State Department of Ecology (Ecology)
identified and submitted to the Department of Energy.

Enclosed is the response to your comments. Again, we
appreciate your concerns and hope that we have adequately
addressed your letter.

If you would like any additional information or have any
questions, please feel free to call me at (509) 376-4919 or Mr.
Richard Hibbard (Ecology) at (206) 493-9367.

Sincerely,

Pamela S. Innis
Environmental Engineer

Enclosure

cc: R. Hibbard, Ecology
B. Stewart, DOE
S. Wisness, DOE
T. Veneziano, WHC
Administrative Record (316-5 Process Trenches)



**RESPONSE TO COMMENTS ON THE EXPEDITED RESPONSE ACTION
PROPOSAL FOR 316-5 PROCESS TRENCHES**

1. **Comment Summary:** Continued Discharge

The concern was raised regarding the continued discharge of effluent to the process trenches.

Response:

The issue of continued effluent discharge to the process trenches is a concern for all of us. Milestone M-17-06 of the Hanford Federal Facility Agreement and Consent Order specifically addresses the cessation of discharges to the process trenches. The U.S. Environmental Protection Agency (EPA) and the Washington State Department of Ecology (Ecology) have denied the initial change request submitted by the Department of Energy (DOE-RL) for an extension on the cease discharge deadline. DOE and its contractors are currently conducting several activities to lessen the impact of the effluent discharge on the process trenches, contaminants of concern and underlying groundwater. (1) The expedited response action (ERA) will remove contaminants from the process trenches. (2) The task of reducing flow to the process trenches via the process sewer lines is currently underway. (3) Measures are being taken to insure that the effluent discharges are cleaner. (4) A value engineering study is currently underway to determine measures that can be taken to expedite the implementation of the effluent treatment facility in the 300 Area. EPA and Ecology are reviewing information obtained from these activities and will make a decision concerning DOE's recent request for an extension to the cease discharge deadline by the beginning of October.

2. **Comment Summary:** Deeper Sampling

The comment was made that deeper sampling should be done in the process trenches.

Response:

EPA and Ecology have required sampling to a depth of six feet as part of the ERA. Previous sampling efforts, noted in detail on pages 8 through 12 of the ERA proposal, and in the Sampling Report of Zimmerman and Kossik (1987), indicate that the majority of the contaminants lie in the upper 18 inches of the soil horizon within the trenches. The excavation efforts in the ERA intend to remove material to approximately 4 feet or more. The sampling should help assess the effectiveness of the excavation and further verify the diminution of contamination with depth. Deeper

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sampling will be performed the year as part of the 300-FF-1 Operable Unit characterization as described in the 300-FF-1 Work Plan.

3. Comment Summary: Work Schedule

The question was raised concerning the season in which the ERA will be performed.

Response:

The ERA field work is scheduled to begin in July and finish in December. A detailed schedule is outlined on page APP-E-10 of the ERA proposal.

4. Comment Summary: Dust Control

The concern was raised regarding the adequacy of dust control measures for the protection of human health and the environment.

Response:

A safety assessment was completed by Westinghouse for the ERA and identified worst case scenarios of conditions and potential resuspension of the primary contaminants. The assessment determined that dust control measures (i.e., application of water during excavation, hauling and placement of material; application of clean fill over excavated material) will be adequate to reduce the potential for fugitive dust generation.

5. Comment Summary: Worker Protection

A concern was expressed on the adequacy of worker protection specifically air monitoring.

Response:

Air monitoring stations will be used to assess the effectiveness of the dust control measures. Two additional air monitoring stations have been set up for the purpose of this ERA. Additional monitoring of the work area and/or workers will be performed as directed by the site safety officer. The work controlling documents address all safety issues that are necessary as part of the ERA.

6. Comment Summary: Impervious Covers

The comment was made that an impervious cover should be used to stabilize excavated material.

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Response:

EPA, Ecology, DOE, and Westinghouse have agreed that an impermeable cover would reduce the potential for contaminant migration. We have agreed that a synthetic liner will be placed over the excavated material as it reaches the desired grade. A layer of aggregate will be placed over the liner to protect it from ultraviolet damage and to secure the liner in place.

7. **Comment Summary:** Westinghouse Hanford/ERMAC Contract Impacts

The concern was raised regarding the impact of the ERMAC contract on the ERA completion.

Response:

Responsibilities of the ERMAC for Hanford are being developed at this time. The ERA for the process trenches will not be effected by the ERMAC contract since it will be completed by December 1991 and the ERMAC contract will go into effect October 1992. For the purpose of the ERA, all requirements noted in APP-E-7 will be met.

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CORRESPONDENCE DISTRIBUTION COVERSHEET

Author: PS Innis, EPA Addressee: LW Noyes Correspondence No.: Incoming: 9102899

Subject: EXPEDITED RESPONSE ACTION PROPOSAL FOR THE 316-5 PROCESS TRENCHES

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