



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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April 30, 1998

Mr. Robert G. McLeod
300 Area Project Manager
U.S. Department of Energy
P.O. Box 550, MSIN H0-12
Richland, Washington 99352

RECEIVED
MAY 01 1998
DOE-RL / DIS

Re: Remediation Activities in 300-FF-1

RECEIVED
MAY 01 1998
BY DIS

Dear Mr. McLeod:

The purpose of this letter is to document our conversations regarding the direction of the 300-FF-1 Remedial Action Project. It is important to have a record of the changes we have made.

The original project schedule reflected that the waste sites in 300-FF-1 would be remediated in the following sequence: the 300 Area Process Trenches, Burial Ground 618-4, the North Process Pond, the South Process Pond, and then the other landfills. This sequence was intended to accomplish two major goals. The first was to complete the RCRA closure of the Process Trenches and the second was to provide remedial action information from 618-4 which could be used to improve remedy selection decisions for other burial grounds and landfills at Hanford. Because of the importance of the burial ground information, a Tri-Party Agreement milestone (M-16-03C) was established, requiring the U.S. Department of Energy (DOE) to submit a report on the remedial actions in Burial Ground 618-4 in August 1998. At the time the milestone was established, it was envisioned that the report would be prepared after remedial actions in 618-4 were completed. However, due to the nature of the waste materials encountered, it will not be possible to complete all waste excavation and disposal in time to prepare the report. Fortunately, sufficient information has been gathered to-date such that the report can be prepared and submitted by August 1998. This will obviate the need to make any change to milestone M-16-03C, as had been envisioned in DOE's March 10, 1998 letter (Letter #056776).

The other direction that we need to document is the suspension of excavation in Burial Ground 618-4. This change is due to the unanticipated nature of some of the wastes encountered in 618-4. Specifically, DOE and its contractor (Bechtel Hanford) and subcontractor (Roy F. Weston) have found a large cache of drummed waste and large quantities of soil which may be restricted from land disposal without prior treatment. The other wastes in 618-4 have already been excavated and disposed of in ERDF.

The U.S. Environmental Protection Agency (EPA) believes that it is not appropriate to continue remedial action work in Burial Ground 618-4 until we have developed plans to

disposition the soils and the drummed waste. Further, EPA believes that it is appropriate to begin remedial actions in the North Process Pond. It is important to note that the suspension of excavation in 618-4 is only temporary and that work will continue on sampling and planning for the removal of the drums.

The nature of the drummed wastes complicates the decision to suspend work. Knowing that there could be 1500 or more drums, and that they contain liquids which could leak out, the first reaction is to expedite their removal from the ground. However, because the drums also contain uranium metal shavings which, under the right conditions, could be pyrophoric, we must plan the removal carefully. It is true that the longer the drums are left buried in 618-4, the potential for the drums to further corrode and leak into the environment increases. However, it is also true that the more times the drums are handled, the potential for an accident which may create the right conditions for a uranium fire increases. This would create a greater risk to workers and the environment than leaving the drums in 618-4 in the short term. Further, if the drums were excavated now, the only thing we could do is to stabilize them by overpacking and, when necessary, add mineral oil. It is conceivable that these stabilization activities could complicate or limit options for final disposition of the drums and their contents. In summary, it is better to wait until we have a plan for the final disposition of the drums to continue with their removal.

If you have any questions, please do not hesitate to call me at (509) 376-3883.

Sincerely,



David R. Einan
300 Area Project Manager

cc: V. Dronen, BHI
J. James, BHI
O. Robertson, DOE
J. Wallace, Ecology