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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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January 26, 1994

Mr. Paul Pak
U.S. Department of Energy
PO Box 550
Richland, WA 99352-0550



Dear Mr. Pak:

Re: Potential Spill/Leak Near 242-A Evaporator Discovered During Construction Excavation of the 200 Area Treated Effluent Discharge Facility

At a meeting on January 26, 1994, concerning the above subject, the U.S. Department of Energy (USDOE) requested the Washington State Department of Ecology's (Ecology) clarification on its position. Unlike any previous activity involving contaminated soil during the construction of the 200 Area Treated Effluent Discharge Facility (W049) pipeline, this instance is the first obvious indication of a leak/spill from an identifiable source. As a potential mixed waste, and pursuant to Washington regulations (WAC 173-303-145 (3)(a)(i), it is required that a spill/leak of unknown constituency be analyzed and designated according to its chemical characteristics. In addition, notification and mitigation and control procedures are also required (WAC 173-303-145).

Ecology requires that USDOE or its contractors, Westinghouse Hanford Company (WHC) and/or Kaiser Engineers Hanford (KEH) sample and analyze the potential mixed waste. Enough samples must be taken to provide sufficient information to appropriately designate the waste. The exact number of samples, the species analyzed, and the sample locations need to be approved by Ecology.

Concerning the continued construction of the W049 pipeline, a number of alternatives exist. They are:

Alternative 1: Delay further construction until the samples have been taken and analyzed. The contaminated soil could be characterized and a determination of its

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designation made. With this information, it would be possible to determine what future actions need to be taken to address the mitigation and control actions required by WAC 173-303-145.

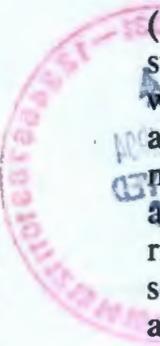
Alternative 2: Continue to construct the pipeline. It would be necessary to provide a material handling plan to Ecology which documents the remediation steps taken (WAC 173-3-3-145 [3]) to prevent the transport of potential pollutants to either the surrounding environment or personnel involved in the construction activities. Ecology would have to agree that the construction program appropriately addresses all safety and environmental issues. Assuming that the appropriate actions can be taken, the material removed from the construction site could be returned to its original location and await possible future remediation. USDOE, however, would have to assume the risk that, should the material prove to be a mixed waste, a dangerous waste, or a solid waste and remediation is necessary, the soil would have to be remediated and any piping placed through the contaminated area would have to be replaced. In addition, depending upon the classification of the material, Ecology would required USDOE to submit a report listing the steps taken to mitigate the spill/leak.

Alternative 3: Reroute the piping around the area of contamination. Remediation of the site would still be required. However, the waste designation and remediation efforts would not affect the construction activities for W049.

Ecology prefers **Alternative 1** as it provides the least potential harm both to the environment and to health and human safety. By analyzing for the presence or absence of possible pollutants, informed decisions could be made on all subsequent activities. It is also, in Ecology's opinion, the most cost effective way of handling the problem. The other alternatives incur either greater potential expense and/or further expensive delays.

Lastly, Ecology would like to state that it is not our intent to seriously delay the construction of the W049 pipeline system. Ecology, however, has been tasked with the duty to see that all appropriate state and federal regulations are followed. Delay has already been incurred because of the failure to take samples and designate the contamination immediately after the determination of a potential spill or leak on December 13, 1993, as required by WAC 170-303-145. Furthermore, Milestone M-17-08 requires the W049 system to be completed by June 1995. A delay of 30-45 days for the sampling results would neither greatly affect this milestone nor would it prevent construction activities on other portions of the pipeline system.

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There remain a number of issues which need to be addressed. I would recommend that USDOE, WHC, KEH, and Ecology work closely together to resolve the remaining issues. Until a determination has been made from the sampling results as to the probable source of these pollutants, I will be Ecology's contact.

If you have any questions, I can be reached at (509) 736-3018.

Sincerely,



Alex Stone, 242-A Evaporator Unit Manager
Nuclear and Mixed Waste Management Program

AS:sr

cc: Ron Carlson WHC
Mark Carrigan, WHC
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Administrative Record

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