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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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October 20, 1994

Mr. Robert G. Holt
Acting Hanford Project Manager
U. S. Department of Energy
P. O. Box 550
Richland, WA 99352



Dear Mr. Holt:

Re: Milestone M-15-07B (Soil Washing Pilot Scale Test)

The M-15-07B due date of August 31, 1994, pursuant to the Hanford Federal Facilities Agreement and Consent Order, has been missed by the U.S. Department of Energy (USDOE). The Washington State Department of Ecology (Ecology) and the U.S. Environmental Protection Agency (EPA) acknowledge the missed milestone, and are cognizant of the request for a seven month extension to March 31, 1995, as stated in USDOE's letter, dated May 13, 1994, from Mr. Patrick Willison. Ecology recognized the potential for delay based on definition of final workscope, and USDOE's procurement difficulties. Thus, the milestone was referred to the Project Managers to resolve the schedule conflicts, as well as the expectations pertaining to workscope and data needs. While these issues have not been resolved entirely, the importance of retaining soil washing technology on Hanford is critical to waste minimization and volume reduction.

Ecology and EPA recognize the data needs for early cleanup decisions are heavily dependent on existing bench scale (laboratory) testing, including cost estimates. Bench scale data shall be included in the first 100 Area Proposed Plans and Focused Feasibility Studies, including 100-HR-1, 100-DR-1, and 100-BC-1. Additionally, Ecology and EPA recognize, based on the timing of the pilot-scale soil testing, the data generated would likely not be available for the first Proposed Plans, Focused Feasibility Studies, and Records of Decision. However, data generated from the pilot scale soil test shall be included in subsequent cleanup documents, as soon as available.

Ecology and EPA expect USDOE to proceed with the pilot scale soil washing test at the 116-D-1B trench with a completion date of February 15, 1995. An evaluation report will be submitted to Ecology and EPA which assesses the cost benefit and effectiveness of the technology and provides, but is not limited to, an engineering evaluation of the applicability of pilot scale soil

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washing to the bench scale data available from the soils at B/C and F Areas. Should the report indicate value in proceeding with further pilot scale testing, Ecology and EPA expect additional soils to be tested, and associated dates and deliverables for those tests to be negotiated.

USDOE must realize the utmost importance of the pilot scale soil test results in providing definitive data that projects soil washing effectiveness, cost, and contaminated soil volume reduction in the field. Furthermore, the initial 100 Area cleanup documents, Focused Feasibility Studies, Proposed Plans, must include bench scale data and cost estimates to ensure that soil washing is properly evaluated as a potentially viable component of cleanup options.

We look forward to finalizing the workscope as agreed to in a revised change package.

Sincerely,



Kevin Oates
Acting EPA Hanford Project Manager



Jack Donnelly
Acting Ecology Hanford Project Manager

KO:JD:mf

cc: Nancy Werdel, USDOE
Administrative Record, 100 Soil Washing Test

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