

0050212

065451

RECEIVED

JAN 15 1999
DOE-RL/DIS

January 15, 1999

Mr. Bryan Foley
U.S. DOE- Richland Operations Office
P.O. BOX 550
Richland, WA 99352

SENT BY MAIL AND EMAIL



COMMENTS ON THE 200 AREA RI/FS STUDY IMPLEMENTATION PLAN

Dear Mr. Foley:

Geosafe Corporation submits the following comments in regard to the 200 Areas Remedial Investigation/Feasibility Study Implementation Plan - Environmental Restoration Program, DOE/RL-98-28 Draft B request for public comment. Geosafe has limited its comments to only Appendix D of this report. Appendix D provides a preliminary list of technologies which may be applicable to the remediation of the 200 Area sites. Geosafe's comments are all related to the discussion of the In Situ Vitrification (ISV) technology for which we are the sole licensed commercial provider.

Geosafe's comments are as follows:

- 1) Pg. D-10, Sec. D5.6, 3rd para.- Replace "encapsulates contaminants" with "chemically incorporates most inorganics (including heavy metals and radionuclides) and destroys or removes all organic contaminants". Delete "The process combines thermal treatment with stabilization.". Replace "process depths are limited to less than 6 m" with "process depths are limited to 6 m with existing equipment but deeper depths are possible. Melts may also be started at depths in the subsurface.".
- 2) Pg. D-17, Sec. D6.6, 1st para.- Replace "A large fume hood would be constructed over the site before the start of the vitrification process to collect and treat emissions." with "An off-gas hood would be placed over the area to be treated. Gases generated during vitrification operations are collected in the off-gas hood and processed by an off-gas treatment system before being discharged. During vitrification operations, a large volume reduction will occur resulting in an estimated 2 m of ground subsidence. This subsidence volume can be filled with clean fill material thereby minimizing the potential for inadvertent human or animal contact with the monolith.".
- 3) Pg. D-18, Sec D6.6, 2nd para.- Replace "However this alternative would not reduce the mass or toxicity of the radionuclides present onsite" with "This alternative would

eliminate the hazardous characteristics of the waste being treated and would result in radionuclides being incorporated in a durable leach resistant vitrified product having a useful life measured in the thousands of years.”

- 4) Pg. D-21, Sec D 6.7, 4th para.- Replace “, but is not considered a fully mature technology due to a limited experience base” with “. The In Situ Vitrification technology has undergone extensive commercial development in the last four years and has been successfully applied to the treatment of over 20,000 tons of soil contaminated with hazardous constituents and 4,000 tons of mixed-TRU contaminated soil and debris.”

If you have any question concerning these comments, please contact me or Mr. Jim Hansen at (509) 375-0710.

Sincerely,

GEOSAFE CORPORATION

Matthew J. Haass, P.E.
Senior Project & Business Development Engineer