

**START**



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STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

7601 W. Clearwater, Suite 102 • Kennewick, Washington 99336 • (509) 546-2990

September 15, 1993

Mr. Dennis Faulk  
US EPA, Region X  
Hanford Project Office  
712 Swift Blvd., Suite 5  
Richland, WA 99352

Dear Mr. Faulk:

Re: Riverland Rail Wash ERA



This project has progressed to a point of requiring a change order be signed by EPA, Ecology, and DOE which describes field activity not originally discussed in the Action Memorandum dated June 23, 1993.

Specifically, the changes calls for the TPH contaminated soil to be excavated and removed to an area near the B Reactor where bioremediation will occur. The concrete "H" pit is now to be broken up and transported to the B Reactor, where it will be processed by a rock crusher with movement of wastes to occur over public highways and be deposited to an area previously uncontaminated with these wastes.

A public notice may be necessary to inform citizens of these changes, as the chosen alternative described in the Action Memorandum was to bioremediate the contaminated soil on-site with the concrete being sandblasted in place.

The following additional concerns have arisen as a result of the above:

- 1) Transport of the waste over public highways to a new location was not included in the original remedial action chosen.
- 2) Bioremediation of the soil and the operation of a rock crusher may require a Notice of Construction to operate under WAC 173-400.
- 3) Ecology has not had opportunity to review a plan which would describe the bioremediation process or that a containment/control system is in place.

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- 4) Ecology has not had an opportunity to review a change package which would describe the substantial need and benefit of deviating from the Action Memorandum.

Therefore, Ecology does not currently find itself in a position of sufficient agreement with the information provided to sign a change order without first addressing the above concerns. I would suggest a meeting to discuss the above concerns prior to the estimated project start date of September 21, 1993. I can be reached at your convenience at (509) 736-3029.

Sincerely,

*Phillip R. Staats*

Phillip R. Staats  
Nuclear & Mixed Waste Management Program

PS:mf

cc: Paul Pak, DOE  
Administrative Record

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