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STATE OF WASHINGTON
 DEPARTMENT OF HEALTH
 DIVISION OF RADIATION PROTECTION
 Airdustrial Center, Bldg. 5 • P.O. Box 47827 • Olympia, Washington 98504-7827

August 9, 1995

HANFORD PROJECT OFFICE
 AUG 14 1995
 ENVIRONMENTAL PROTECTION
 AGENCY

Dennis Faulk, Unit Manager
 U.S. Environmental Protection Agency
 712 Swift, Suite 5
 Richland, Washington 99352



Dear Mr. Faulk:

Department of Health staff has reviewed the *Riverland Expedited Response Action Assessment* and the *Proposed Plan for the 100-IU-1, 100-IU-3, 100-IU-4 and 100-IU-5 Operable Units*. This review covers only the radioactive components of the 100-IU-1 Operable Unit, the Riverland Railyard. Operable Units 100-IU-3, 100-IU-4 and 100-IU-5 had no known radioactive contaminants and thus were not included in the review. At this time the Department of Health acknowledges that potential environmental and human health risks resulting from exposure to residual environmental radioactivity at the Riverland site are low.

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This position is based on the Department's review of radiological data contained in the *Riverland Expedited Response Action Proposal*. This document describes historic facility radioactive contaminant levels, facility decontamination practices which had the potential to contaminate the soil column and groundwater and, explains various remedial alternatives.

Our initial concerns with this document involved: (1) a lack of environmental data which plausibly characterized the distribution of residual radioactivity in the facility, soil column or groundwater, and (2), potential exposure to workers and the public from dispersal of small undetected deposits of residual radioactive material during remedial activities. Although radioactivity was not listed as a contaminant of concern, it was our experience that residual radioactivity could be concentrated in relatively small sections of a facility creating a hot-spot.

Subsequently, the Riverland Rail Maintenance Shop was excavated under the ERA's *Hazardous Waste Removal and Offsite Disposal Alternative* and backfilled with clean soil. In August 1994, the Departments of Health and Ecology collected soil samples from the backfilled areas. Department of Health data indicate the presence of natural and man-made radioactivity consistent with background levels. A staff review of historical groundwater data for wells #699-66-103 and 699-68-105 would agree with statements in Groundwater Section (page 8) of the *Assessment* document.

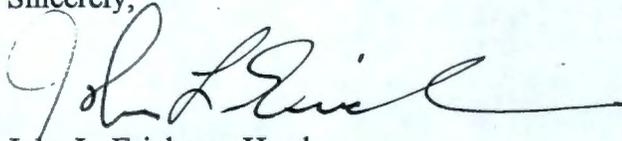


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Current groundwater measurements for radioactivity are well below State drinking water standards, WAC 246-290.

In summary, the Department of Health concurs with the "no further action" recommendation for the 100-IU-1 Operable Unit, the Riverland Railyard.

Sincerely,



John L. Erickson, Head
Environmental Radiation Section
Division of Radiation Protection

JLE:RAD:KP

cc: T.R. Strong
Allan Danielson

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