



Department of Energy

Richland Operations Office
P.O. Box 550
Richland, Washington 99352

0014376

JUN 5 1991

91-EAB-119

Mr. Terry Husseman, Assistant Director
State of Washington
Department of Ecology
Mail Stop PV-11
Olympia, Washington 98504-8711

Dear Mr. Husseman:

MANAGEMENT OF CONTAMINATED SOIL

Radiological surveys of Tank Farm facilities show that there are approximately eight million square feet of radioactive contaminated soil within the Tank Farms. This soil is exposed to both wind and weather and as a result, the contamination is continually spreading. The U.S. Department of Energy's (DOE) responsibilities under the Atomic Energy Act to control the spread of radioactive contamination and the potential for exposure to personnel require that action be taken.

In order to reduce the spread of radioactive contamination at the Hanford Site, the DOE, Richland Operations Office (RL) is compelled to implement a surface contamination remediation program. Implementation of this program in the Tank Farms area may require excavation of large volumes of contaminated soil that will require management. This contamination may have been generated from waste in the single-shell or double-shell tanks which originated from a listed waste source. Preliminary sample data obtained from the Tank Farms indicates that listed waste constituents either have not been detected or have been detected at concentrations below health-based standards. The DOE-RL proposes to manage soil that contains concentrations of listed waste below health-based standards as low-level waste.

In a letter dated September 26, 1990, to R. D. Izatt, DOE-RL and R. E. Lerch, Westinghouse Hanford Company to Mr. Nord of your staff indicated that further excavation associated with removal of the 703-1 Tank was not warranted because contamination levels were below health-based standards. It is important to note that this tank did contain listed dangerous waste and was operated as a less than 90-day accumulation tank. Further, in the attached June 19, 1989, letter (attachment 1) and February 28, 1990, memorandum (attachment 2), the U.S. Environmental Protection Agency (EPA) has indicated that soil and groundwater that are contaminated with listed hazardous waste require management as a hazardous waste as long as



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they contain the listed waste constituents of concern. To contain the listed waste, the EPA has indicated that listed waste constituents in environmental media must be present above health-based standards.

As you know, cleanup costs at the Hanford Site are increasing. Adopting the EPA guidance for soils containing listed waste constituents below health-based standards will reduce cleanup costs as well as reduce radioactive surface contamination while ensuring protection of human health and the environment.

Effective July 1, 1991, the DOE-RL intends to adopt health-based standards as designation limits for listed waste contaminated soil at the Hanford Site. All waste designation decisions for listed waste contaminated soil will be based on EPA's health-based standards proposed under Section 3004(u) of the Resource Conservation and Recovery Act.

If you should have further questions concerning this management practice, please contact Ms. Sandy Trine, DOE-RL, at (509) 376-6943.

Sincerely,



Leo E. Little, Assistant Manager
for Environmental Management

ERD:SLT

cc: T. L. Nord, Ecology
P. T. Day, EPA
R. E. Lerch, WHC
W. H. Hamilton, WHC

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Subject: MANAGEMENT OF CONTAMINATED SOIL

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*Reissue for corrections - on first issue, the word "internal" appeared by the letter number on the coversheet, and the number was not typed on the letter itself. (6/10/91)

