STATE OF WASHINGTON

## DEPARTMENT OF ECOLOGY

Mail Stop PN-11 • CPVmpia VVasnington 96504-6711 • (206) 459-6000

April 22, 1993

Mr. Eric Goller U.S. Department of Energy P.O. Box 550, Mail Stop A6-95 Richland, Washington 99352

Dear Mr. Goller:

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RE: 100 Area Excavation Treatability Test

The purpose of this letter is to inform U. S. Department of Energy (USDOE) of the Department of Ecology (Ecology) position regarding the proposed excavation treatability test. As you know, the U. S. Environmental Protection Agency (EPA) and Ecology were not pleased with the particular content of the test, the location, or the long-term use of the "TerraStor" for residuals management. Ecology and EPA, after extensive consideration, have agreed to allow this test, provided the additional provisions below are followed:

- Take at least four samples using field screening equipment capable of detecting inorganic and organic chemicals. If hazardous chemicals are detected, a split sample must be sent for laboratory analysis and comparison.
- Evaluate the effectiveness of the organic and inorganic Level I vs. Level III
  data generated in the sodium dichromate ERA in this treatability test.
- Designate this waste under Chapter 173-303 WAC.
- Limit the length of interim waste storage in the "TerraStor" to eighteen months. At this time, all waste and the "TerraStor" must be removed from site.

 Soil wash the entire stockpile of waste contained within the "TerraStor" in conjunction with the 100 Area pilot scale soil washing treatability test.



- Perform water-leach leachability tests on the contaminated fraction of soil generated in the soil washing.
- Collect the contaminated fraction and perform a vitrification test to be conducted in the 200 Area on the residual contaminated fraction. If soil washing is not performed vitrification of the contaminated soil must still occur.
- Create Tri-Party Agreement (TPA) milestones to support the previous bullets.

Ecology recognizes that portions of this request involve an increase in scope. Ecology is open to reevaluating the 100-HR-1 Milestone if necessary. As always, the particular details of the above provisions must be approved by Ecology prior to implementing the test. Please respond within one week to this proposal in writing. If you have any questions, please call me at (206) 493-9367.

Sincerely,

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Richard B. Hibbard, P.E.

Nuclear and Mixed Waste Management Program

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RBH:dr

cc: Beckey Austin, WHC
Dennis Faulk, EPA

Administrative Record (100 Aggregate Area)

## CORRESPONDENCE DISTRIBUTION COVERSHEET

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Richard B. Hibbard, Ecology Mr. Eric Goller, RL

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Subject: 100 Area Excavation Treatability Test

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