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DEPARTMENT OF ECOLOGY

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February 24, 1992

Mr. R.D. Izatt, Program Manager
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USDOE, Richland Field Office
P.O. Box 550
Richland, WA 99352

Mr. R.E. Lerch, Manager
Environmental Division
Westinghouse Hanford Company
Richland, WA



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MAR 6 1992

R. E. LERCH



Re: Removal Action in the 100-NR-2 Operable Unit

Dear Messrs. Izatt and Lerch:

Thank you for your letters of January 10 and 22, 1992, regarding the removal of mulberry bushes in the 100-NR-2 operable unit. The letter clearly explains USDOE's position regarding its authority under the Atomic Energy Act (AEA) to conduct radiation removal actions. The referenced meeting on January 23 conveyed new information, and we look forward to future, productive meetings and further exchanges of ideas.

Ecology wishes to correct the USDOE assertion that the primary issue was regulator approval of this removal action. The underlying concern the parties share is over the potential entry of contamination into the food chain. This is why Ecology has been adamant that all removal actions be coordinated with the USDOE-RL Environmental Restoration Division. The paucity of data quantifying existing and potential adverse effects on public health and the environment is a major obstacle in defining appropriate corrective action at Hanford. It is imperative the parties not miss any opportunity to collect and assess new data. The requirements of CERCLA and Article XIII of the Hanford Federal Facility Agreement and Consent Order are not necessarily inconsistent with USDOE authority under the AEA.

The January 23 meeting, while informative, did not provide us with confidence that coordination is occurring between USDOE-RL and its contractors. Specific questions were unsatisfactorily answered: how vegetation is being analyzed, efforts to assess bioaccumulation, and how data are being transmitted between PNL, WHC, USDOE, and Ecology. The vague responses we received indicated there is still much coordination that must be done to ensure that all data being collected at Hanford will be used to enhance the parties' understanding of environmental pathways, and further implement the Hanford Federal Facility Agreement and Consent Order.

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R.D. Izatt and R.E. Lerch
February 18, 1992
Page 2

The most recent example of where this may occur is the 116-N-4 emergency dump basin. Radioactive minnows have been discovered in this 1,000,000 gallon basin. It has been proposed that screening material be placed over the basin to prevent the potential spread of contamination through avian predation, and that the minnows, algae, and vegetation potentially be destroyed with a biocide. Missing from this proposal are requirements to determine the source of contamination, to ascertain how the minnows are becoming radioactive, to quantify bioaccumulation of radionuclide and other hazardous substances in minnows and their prey, and to apply this knowledge to conceptual environmental pathways, operable unit data quality objectives, and risk assessment.

Following are Ecology expectations to ensure Hanford Site data can be fully utilized:

- o All removal or remedial actions (e.g., underground storage tanks) taken at the Hanford Site will be integrated with site characterization and remedial activities under the auspices of the Hanford Federal Facility Agreement and Consent Order. USDOE and WHC environmental restoration operable unit managers will have the opportunity to provide comments on planned actions. The intent of this integration is to undertake field activities in a timely and cost effective manner and to satisfy the requirements of NCP §§ 300.415(c) and 300.430(d).
- o All removal or remedial actions at Hanford will require data be generated to further the objectives of the Hanford Federal Facility Agreement and Consent Order. These data will be formally transmitted to the appropriate USDOE, EPA, and Ecology environmental restoration operable unit managers.
- o Data generated during removal actions must be subject to past practice sampling and analysis QA/QC requirements such that the data can be readily integrated into ongoing or anticipated site characterization requirements.

In summary, Ecology anticipates a coordinated, cross-program approach to data collection and environmental restoration at Hanford. We look forward to working with you to achieve this important goal. You may direct questions or comments concerning this matter to Mr. Larry Goldstein at (206) 438-7018.

Sincerely,



David Jansen
Hanford Project Manager
Nuclear and Mixed Waste Management

cc: Paul Day, EPA
Steve Wisness, USDOE
T. B. Veneziano, WHC

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Subject: REMOVAL ACTION IN THE 100-NR-2 OPERABLE UNIT

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