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STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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January 21, 1993

Mr. Eric Goller  
US Department of Energy  
P.O. Box 550 A6-95  
Richland, WA 99352-0550



Dear Mr. Goller:

Re: 100 Area Treatability Test Test Pit DOW

Enclosed are Ecology's second set of comments on the DOW for the 100 Area Treatability Test. The first set of comments were not dispositioned prior to performing work in the 100-BG-1 Operable Unit. Prior to beginning field work in the 100 DR-1 Operable Unit these comments must be resolved and Ecology must approve the DOW.

If you have any questions, please call me at (206) 493-9367.

Sincerely,

*Richard B. Hibbard*  
Richard B. Hibbard, P.E.  
Hanford Project  
Nuclear and Mixed Waste Management Program

RBH:jr  
Enclosure

cc: Becky Austin, WHC  
Julie Erickson, USDOE  
Dennis Faulk, EPA  
Larry Goldstein, Ecology  
Jeff Phillips, Ecology



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COMMENTS ON THE 100 AREA TREATABILITY TEST

TEST PIT DOW

1. General:

Deficiency: This DOW does not identify a numerical "goal" that could be used by the field crew in selecting an acceptable sample. That goal should be the minimum activity necessary for the treatability test to succeed.

The concept of collecting two set of samples has not been previously discussed. Has USDOE considered collecting a sample equal to one half of the "goal" discussed above? The purpose of this sample would be to expose the lab and bench scale tests to a reduced degree of contamination. It has been hypothesized that the majority of the contamination is large volume low level. This second sample would provide knowledge with respect to the minimum treatable level of contamination.

Recommendation: Revise the text to identify the numerical "goal" of this sampling event.

Consider the concept of testing lower levels of contamination.

2. General:

Deficiency: This DOW does not address waste/residuals management considerations. For example, the plastic that is proposed for use could be reused after decontaminating. If reuse is unreasonable it must be disposed as a hazardous waste. Also, will any soil be returned from the laboratory? If it is how will it be managed?

Recommendation: Expand this section to include a waste and residuals management section.

3. Section 1.0, Page 1:

Deficiency: The purpose of this DOW is not stated.

Recommendation: Revise the introductory section to describe the purpose of this field work.

4. Section 3.3, Page 5, last paragraph:

Deficiency: The request for variance in this DOW is not adequate. In order to receive a variance from Chapter 173-160 WAC USDOE must comply with Mr. C. Cline's letter to S. Wisness on November 6, 1992. Specifically the following issues must be addressed:

- Reason for variance request. State the reasons why the WAC cannot be met.
- Describe the number of boreholes or test pits.
- Describe the life of the investigation. How long is the hole expected to remain open?
- Include a (readable) site map showing the excavation locations.
- Information regarding the static water level from surrounding wells.
- Schematic drawing of the proposed excavation. This should include depth, diameter, surface protective measures, and surface completion details.
- Proposed abandonment procedures.

Recommendation: Revise the DOW to include the information presented above in order to receive a variance from the abandonment requirements in Chapter 173-160 WAC.

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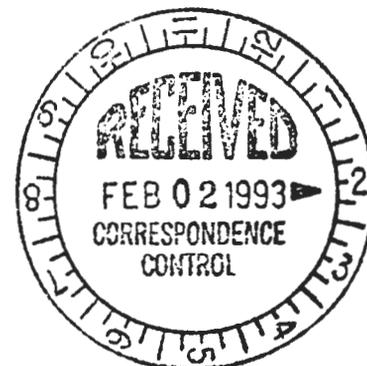
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Author: R. B. Hibbard, Ecology      Addressee: E. D. Goller, RL      Correspondence No.: Incoming: 9301503

Subject: 100 AREA TREATABILITY TEST TEST PIT DOW

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