



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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March 23, 1995

Mr. Steven H. Wisness
U.S. Department of Energy
P.O. Box 550
Richland, WA 99352



Dear Mr. Wisness:

RE: USDOE REQUEST TO CHANGE N SPRINGS ACTION MEMORANDUM

This letter follows our receipt of your February 8, 1995 letter, and subsequent March 6, 1995 meeting at which we provided and discussed associated Washington Department of Ecology (Ecology) and Environmental Protection Agency (EPA) policies. As such, this letter constitutes a more formalized Ecology and EPA response to USDOE requests for reconsideration and for relief from work required by the above noted Action Memorandum in the vicinity of N Springs, and the 1301-N and 1325-N cribs. 40347

Over the past few weeks our respective technical staff have worked together evaluating new data which has become available as a result of activities in the vicinity of N Springs. In some respects Ecology and EPA agree that this information supports a substantial revision of work requirements in the area. Most specifically, we agree that barrier wall constructability tests have demonstrated that installation of a jointed hinge sheet pile wall of no less than 3000' length (and as currently designed and installed) is not achievable. Consequently, we are initiating actions aimed at revising Ecology/EPAs' September 23, 1994 Action Memorandum accordingly.

However, we also note that we do not agree with USDOE findings: (a) regarding total Strontium 90 flux to the Columbia, or (b), its request for relief from requirements pertaining to the installation and operation of a pump and treat system. Our observations in these regards are as follows:

- (1.) **Regarding total Strontium loading to the Columbia:** USDOEs' February 8 request for relief is based in large part on its assertion that the flux of Strontium 90 to the Columbia has been "...overestimated...by almost 90%", and is now projected at "...an average of .16 Ci/yr". As a result of Ecology/EPA technical review, we do not believe that USDOE (or its contractors) have sufficient information on which to draw these conclusions with any degree of certainty. Conversely (based on the information now available) one could just as easily assert a much larger flux (on the order of 20 Ci/yr).

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Consequently, though we certainly agree that installation of a lengthy barrier wall as originally designed is unwarranted, we are not convinced that a modified barrier may not be necessary in order to meet our objective of significantly reducing continuing and excessive Strontium 90 discharges to the environment of the Columbia. We expect that USDOE and its contractors will not halt any work in progress or planned which will more accurately assess the flux of Sr90 to the Columbia, further characterize geologic and hydrologic conditions within the area (including refinements to expected response models), and assess design and installation alternatives related to modified barriers and expected performance. It is our understanding that sufficient information in these three areas will be available by March, 1996, and that a final assessment of benefits which may be realized through installation of a modified barrier will be made at that time.

- (2.) **Regarding installation of an initial module N Area Pump and Treat system:** USDOEs' request for relief from Action Memorandum requirements in this regard seem based on its conclusion that a pump and treat system (in and of itself) would not result in a significant reduction in Sr90 flux to the river (with or without a barrier wall). We agree that this may be the case. However, we do not agree with USDOEs' subsequent conclusion that a non time critical Expedited Response Action (ERA) is not warranted, and that field installation and operation of a small scale (P&T) system is not of value. We note that though augmenting actions taken to reduce Sr90 flux to the river should be one of our objectives, meeting "treatability test" objectives through field application is equally necessary (see TPA Dispute Resolution Committee M-14-00 settlement of January 8, 1993).

Consequently, USDOE remains required to proceed with the installation of a small scale (50 GPM) initial module P&T at N Springs pursuant to Action Memorandum requirements. We do not expect substantive modification of the Action Memorandum in this regard.

In addition to the above, we would like to point out our deepening concern regarding appropriate timing of closure of the 1301-N and 1325-N cribs. As you will recall, one of the basic premises of our tentatively agreed to N Area Pilot Project has been the focusing of attention (and cleanup dollars) on high priority units (in this case, the two aforementioned cribs, resulting skyshine, and groundwater/surface water contamination). Agreements to coordinate RCRA and CERCLA requirements on a pilot project basis were made with the understanding that USDOE would act to: (a) lessen impacts from these units on an interim basis, (b) accelerate crib characterization, and (c) subsequently move to crib closure (maintaining an overall level of Pilot Project effort).

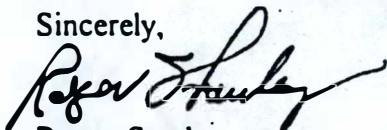
We propose that representatives from each agency meet in order to craft a consolidated action plan regarding N Springs / N Area crib actions, and that this plan be consistent with: (i) Our January 8, 1993 DRC settlement, (ii), revisions to Ecology and EPAs' September 24, 1994 Action

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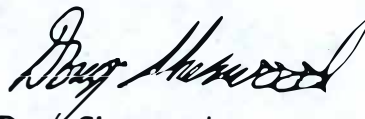
Memorandum (pursuant to a revised course of action as described here), (iii) planned acceleration of crib characterization, and (iv) corresponding modifications which will be necessary to our N Area Pilot Project change request. This plan of action would of course need to include planning for public review before finalization.

Please feel free to contact us if you have any questions. We look forward to scheduling a working session with key staff at your earliest opportunity.

Sincerely,



Roger Stanley
Hanford Project Manager
WA. Dept of Ecology



Doug Sherwood
Hanford Project Manager
Environmental Protection Agency

cc: Julie Erickson, USDOE/RL
Larry Arnold, WHC
✓ Scott Hajner, BHI
Administrative Record

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