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Mr. Dave C. Nylander
Nuclear and Mixed Waste
State of Washington
Department of Ecology
7601 W. Clearwater, Suite 102
Kennewick, Washington 99336

Mr. Douglas R. Sherwood
Hanford Project Manager
U.S. Environmental Protection Agency
712 Swift Boulevard, Suite 5
Richland, Washington 99352

Dear Messrs. Nylander and Sherwood:

NORTH SLOPE EXPEDITED RESPONSE ACTION (ERA)

In reference to your letter dated October 7, 1993, we have the following comments. 32719

Part of the ERA program consists of weekly interface meetings between the State of Washington Department of Ecology (Ecology), the U.S. Environmental Protection Agency (EPA), and the U.S. Department of Energy (DOE). At these meetings, the parties discuss ERA project milestones, schedules, current status, action items, etc. Since the North Slope ERA is one of the projects that is discussed each week, I am concerned that you are unaware of this project's status.

As stated in your letter, the North Slope ERA was indeed nearing completion in late August 1993 and was scheduled for release to the public on September 7, 1993. However, on August 30, 1993, Ecology and EPA requested a meeting with DOE to discuss the ERA and the proposed remediation alternatives. Both Ecology and EPA were concerned that the ERA, as then written, was not ready for public comment.

The requested meeting between the three parties was held on August 31, 1993. Ecology, with EPA concurrence, recommended that a new remediation alternative be added to the ERA. The new alternative would have one of the three previously characterized landfills excavated as a new characterization effort. This would either prove or disprove the theories as to what is contained in the remaining nine landfills, seven of which have not been sampled. These remaining nine landfills, depending on the results of the landfill excavation, would then be characterized by test trenching, visual inspection, and field screening.

DOE agreed to include this new alternative in the ERA proposal as the preferred alternative and subsequently began revising the ERA. These revisions necessarily required the cancellation of the September 7, 1993, through October 6, 1993, public comment period.

The ERA proposal has now been finalized, with Ecology, EPA, and DOE-Headquarters concurrence, and was mailed out for comment to highly interested stakeholders on November 2, 1993, along with the Ecology-prepared Focus Sheet. Accordingly, the public comment period has been set for November 8, 1993, through December 8, 1993. A public meeting has been scheduled for November 23, 1993, in Mattawa, Washington at 7:00 p.m. Mr. Dib Goswami of your staff, has set a date of December 28, 1993, for issuance of the Action Memorandum.

At this time, DOE feels that the target remediation date of October 1994 is still achievable. The U.S. Army Corps of Engineers (USACE) has been tasked by DOE to perform the remediation and additional characterization activities. The USACE is currently preparing, for regulatory review, the draft characterization work plans, field sampling plan, quality assurance project plan, and the site specific health and safety plan for the DOE preferred alternative. This will place the USACE in a position to immediately commence field activities soon after Ecology issues the Action Memorandum. Field activities to complete the one landfill removal will take a maximum of eight weeks to complete. If required, subsequent characterization of the remaining nine landfills (including total landfill removal if large quantities of regulated wastes are discovered) can be performed in a maximum of four months using multiple work crews. The USACE is fully capable of performing this amount of work in a short timeframe using existing contracting capability.

This strategy necessarily assumes that the DOE preferred remedy will be the Ecology-selected alternative. If, on the other hand, Ecology selects a remedy that involves the removal of all 10 landfills without further characterization, then funding will become a major issue. The remediation strategy will then have to be revisited and the time to perform discussed.

If you have any questions or need more information, please contact Mr. Walt Perro at (509) 372-3704.

Sincerely,

Steven H. Wisness
Hanford Project Manager

END:WDP

cc: D. J. Cannon, USACE
R. Chong, USACE
D. A. Faulk, EPA
D. Goswami, Ecology
D. R. Sherwood, EPA
R. F. Stanley, Ecology
T. M. Wintczak, WHC

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Author	Addressee	Correspondence No.
S. H. Wisness, RL	D. C. Nylander, Ecology D. R. Sherwood, EPA	Incoming: 9308800

Subject: NORTH SLOPE EXPEDITED RESPONSE ACTION (ERA)

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