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Subject: ERDF comments

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I have the following concerns regarding the removal of contaminated soil and placement in ERDF:

1) It is unknown whether sufficient soil analysis is being done to identify the particular chemicals in contaminated soil. This leads to the following problems:

A) Clean soil may be being removed - taking up valuable and costly ERDF disposal space

(I would hope that environmental restoration progress and performance is not evaluated by the volume of dirt moved)

B) Soil with different contaminants present may be mixed. While various chemical reactions are possible, the most potentially concerning is the mixing of complexant containing soil (e.g., EDTA - tons used at Hanford) with toxic species such as heavy metals or radionuclides (e.g., Pu), thus dramatically increasing the mobility of these otherwise immobile toxic species.

Sincerely,

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