

# START



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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October 7, 1993

Mr. Steven Wisness  
Hanford Project Manager  
Department of Energy  
Richland Field Office  
P.O. Box 550  
Richland, WA 99352



9413092-0583

Dear Mr. Wisness:

Re: North Slope Expedited Response Action

This letter is to express our concern regarding the cleanup of the North Slope within the time frame agreed to by the Washington State Department of Ecology (Ecology), the United States Department of Energy (DOE), and the Environmental Protection Agency (EPA). The North Slope was included in our joint "Agreement in Principle" (AIP, March 31, 1993) to ensure that this project would be completed by October 1994.

As the lead regulatory agency, Ecology requested an early submittal of the North Slope Expedited Action Proposal involving Engineering Evaluation and Cost Analysis (EE/CA). To facilitate an accelerated review, Ecology expected the submittal of the document in the first week of May 1993. As the Tri-Party negotiations started in May 1993, Ecology asked DOE to expedite the process of the EE/CA. However, Ecology and EPA did not receive the draft document until June 28, 1993. The regulators reviewed the document, and a comment resolution meeting was held on July 19, 1993. In that meeting, DOE agreed to submit the revised document by August 1, 1993, for Ecology and EPA's approval prior to its release for public comment. Mr. Dib Goswami, Ecology's Unit Manager, also wrote a formal letter to Mr. Walter Perro, Unit Manager at DOE, on July 26, 1993, reminding DOE about their commitment to submit the final draft within the first week of August 1993. All three parties agreed to make necessary preparation of a focus sheet and press releases for public comment. Accordingly, the public comment period was set for September 7 thru October 6, 1993. Ecology, as the lead agency, made several contacts with DOE during August 1993, regarding the submittal of the final draft proposal. As of this date, we are still waiting for the proposal without any firm commitment from DOE. Under these circumstances, the public comment period was cancelled.

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DOE is presently considering additional alternatives in the document. Under this proposal, DOE is planning to excavate one or two landfills and fully characterize them. Based on the results of the characterization, the remaining landfills would either be excavated and removed completely or would be characterized fully to show that no contamination exists. However, nothing is finalized and DOE-Richland has yet to get approval from the DOE-Headquarters. Presently, even if we receive the final draft of the document by the end of October 1993, the Action Memorandum will not be ready before January 1994. Under these circumstances, Ecology strongly feels that the target date set for cleanup of North Slope by October 1994, will not be met. It is in both of our interest to get this project completed on schedule. DOE must develop a strategy that ensures the site will be remediated by October 1994.

If you have any questions, please call me at (206) 459-6451.

Sincerely,

*Dave Nylander*

Dave Nylander, Kennewick Manager  
Nuclear and Mixed Waste Management Program

DN:DG:mf

cc: Dennis Faulk, EPA  
Doug Sherwood, EPA

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