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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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May 15, 1990



Mr. James Goodenough
Operable Unit Manager
USDOE
Richland Operations Office
P.O. Box 550
Richland, WA 99352

Re: North Slope Investigation Report

Dear Mr. Goodenough:

General Comments

The North Slope Investigation Report contains two shortcomings that undercut its reassuring tone. First is the thoroughness of the investigation as compared to the expressed objectives, and second is the presentation of the results.

The objective of the investigation and the conclusion of the Report are obfuscated by descriptions of the site and the study. A reader can only evaluate the investigation against the purpose and result stated in the report. The following two sentences appear to present these two points:

- 1) "The objectives of this investigation were to assess potential health, safety and environmental concerns, and the need for corrective action..." (pg. 3), and
- 2) "During this investigation, no environmental hazards have been identified that require immediate corrective action." (pg 14).

Between these two points, there is little substantive information on which to justify the determination.

It was not stated whether this study only encompassed Phase 1 of the investigation, or both Phases 1 and 2. The former appears be the case, however, based on the subjective nature in the Report. For example, will the military landfills be sampled below the surface? The investigators identified many sites of questionable nature, but deferred to unspecified future studies, or comparable studies of other military Sites.

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Reference to investigation of sites in the 100-IU-3 Operable Unit was especially cursory. For example, the USBR 2,4-D site is identified as having roughly 900 gallons of 2,4-D mixed in 50 yds. of soil, along with crushed contaminated tanks, (pgs A-1 and B-42) in violation of 3004(e). This site then, appears to merit closer scrutiny and deserves additional text to inform the reader why investigations are being deferred to the operable unit investigation. The same concern applies to Sites PSN 04 and PSN 90. Only if it is understood that this report is a first phase, i.e., a qualitative assessment, does the Report appear adequate.

The regulatory context of the Report is not presented. The Report fails to reveal that the North Slope is part of the Hanford Site, which is on the FAWH Compliance Docket and the NPL, and subject to the Hanford Federal Facility Agreement and Consent Order, and an established body of laws, regulations, and procedures. Presumably, the investigation would not have been conducted unless required, or at least allowed by law; and presumably, the investigation must follow mandated guidelines.

Is the Report intended to be functionally equivalent to the preliminary assessment and evaluation mandated by CERCLA section 120(d)? Has removal or remedial action been conducted pursuant to CERCLA section 104? This investigation should have been evaluated in accordance with the National Contingency Plan, 40 CFR 300 (55 Fed. Reg. page 8666, March 8, 1990). The regulatory context would help the Report clarify whence the investigation came, and where it is going.

Specific Comments

Page 3, paragraph 2:

What are the "internal Westinghouse Hanford procedures" that are referenced. If these are from the EIIs, then so state.

Page 3, paragraph 2:

What is the "Operational Site Services organization" that is referenced? Under what authority will the organization be "responsible for determining and implimenting appropriate mitigation..."? How does this relate to CERCLA requirements?

Page 3, paragraph 5:

What is the Hanford Site database referenced?

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Page 4, paragraph 3:

Clarify the criterion "potential increasing problems with time". How was this criterion assessed given the nature of the investigation?

Page 5, Section 3.2.3:

Define WIDS.

Page 5, Section 3.3:

What is meant by, "Health and safety requirements prohibited more than visual observation"? Relate this preliminary determination to field methods and the final determination.

Page 8, paragraph 5:

Where is the information on the 2,4-D burial site documented?

Recommendations:

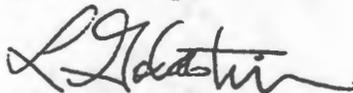
- o Re-write this report for the intended educated public audience. State the objectives clearly and concisely in one discrete section. Explain the regulatory context of the Report, including the Hanford Federal Facility Agreement and Consent Order. Explain the potential hazards to the public health, and threats to environmental quality the study is intended to address, using for example, the concepts of imminent and substantial endangerment and interim remediation.
- o Explain how this report fits into the phased investigation. The Report should clearly state what phase or phases it encompasses. The exact nature of the Phase 2 future actions and investigations should be specified as recommendations. Explain how unknown hazards, such as the military landfills, will be evaluated.
- o Segregate explanation of the scope of the investigation into one discrete section.
- o Segregate explanation of the investigation findings to one discrete section, or at least provide cross references between each paragraph in which a site is discussed.

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- o Disclose the repository of the raw data, so that those who wish to verify the information or reevaluate the conclusions may do so.
- o Explain what further steps will be taken at each site, avoiding such vague recommendations as "investigation may be appropriate." Explain the urgency and legal mandate behind the recommendations. Explain the deferral to the overall Hanford cleanup mentioned on page 14.
- o Rewrite the Abstract as an Executive Summary which clearly presents the following information: why was this investigation undertaken; what was the nature and limitations of the investigation; why was this study limited; what specifically was discovered; what interim measures have been taken to protect the public health; what further investigations must be conducted; and how and when those investigation will take place.

Sincerely,



Larry Goldstein
CERCLA Unit Supervisor
Nuclear and Mixed Waste Management

cc: Paul Day, EPA
Jack Waite, WHC

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