UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10 HANFORD PROJECT OFFICE
712 SWIFT BOULEVARD, SUITE 5
RICHLAND, WASHINGTON 99352

June 18, 1993

Ron Hinz
1808 Riverside Drive
West Richland, Washington 99352

Re: Riverland Expedited Response Action Proposal Comments Response

Dear Mr. Hinz:

Thank you for taking the time to review and comment on the Riverland Expedited Response Action (ERA) proposal.

Your comments indicated a concern related to the cost of this project relative to the environmental risk. The U.S. Environmental Protection Agency (EPA) agrees that the costs appear to be high for the magnitude of this project. However, it should be noted that the cost of the cleanup alternatives also included a landlord cleanup of physical hazards. The landlord cleanup portion accounts for $85,000 or nearly one-third of the cost of the project. The EPA and the Washington State Department of Ecology (Ecology) do not support and do not have the authority concerning the landlord cleanup. The EPA and Ecology therefore, have eliminated this portion from the proposal. The U.S. Department of Energy (DOE) may choose to complete this work outside the scope of the ERA to facilitate land transfer.

EPA and Ecology recognized early on in the clean up program at Hanford that the cost of doing business was extremely high. In 1990, EPA and Ecology conducted a cost evaluation project to review the DOE program and determine why costs are so high. The "Cost Evaluation Project" provided recommendations to assist DOE in controlling costs. In addition, DOE is currently implementing recommendations from the schedule optimization study that may result in efficiencies as well as reduced costs to the clean up program. EPA and Ecology will continue to work with DOE to develop cost control measures needed to perform work at Hanford in an efficient manner.

A limited sampling program was initiated to determine if any contaminants were present in the various waste units located in the 100-IU-1 Operable Unit. As indicated in the Engineering Evaluation/Cost Analysis (EE/CA), contaminants above regulatory concern were found at two waste sites in the operable unit. It should be noted the sampling program was limited in scope and developed to only determine the nature of the contamination and not the extent.

The three parties have agreed to use the observational approach (i.e., characterize as you go) to determine the extent of contamination. This is particularly important for the drain field from the riverland rail wash pit.

The other alternative the three agencies are faced with to determine the extent of contamination is by performing an intensive sampling program. Past history has shown that removal of the waste is the more economical solution.

Therefore, to be consistent with the objective of the ERA to allow for a land release, the EPA and Ecology are supporting the DOE's alternative detailed in the EE/CA excluding the landlord cleanup.

If you have any questions, please contact me at (509) 376-8631.

Sincerely,

Dennis A. Faulk
Environmental Scientist

cc: Becky Austin, WHC
Jack Donnelly, Ecology
Mary Getchell, Ecology
Paul Pak, DOE
Administrative Record (Riverland ERA)

File. Riverland ERA

Mr. Dennis Faulk
USEPA
712 Swift St., Suite 5
Richland, WA 99352

May 18, 1993

Dear Mr. Faulk,

This is in response to your solicitation for public comment on the Riverland Rail Wash Expedited Response Action.

On reading your one page notice, I sense that you did not make a strong case for the cost effectiveness of the cleanup activities as proposed. Diesel fuel in the soil is an unarguable hazard as it may migrate but you did not mention the possibility of in situ burning it out of the soil or possibly after exposing it by plowing or tilling. The high cost of shipping every thing somewhere else seems difficult to justify as well as is the significant consumption of fuel while doing so.

Can the radiological contamination be contained by providing a concrete cap over the area to inhibit the spread of it? The low rainfall in this area makes such an action feasible as wind blown contaminated dust is as big a problem as any on the Hanford site. However, the subsoil migration of dry contaminants is generally not a problem.

Both the laser and sand blast techniques proposed for cleaning oil off of the concrete have got to be counter productive and very expensive. If the oil is that strongly adhered to the base material, its going to stay there and your proposed actions will only serve to spread it around. Leave it be.

Note that the site is already a good candidate for designation as a disposal facility and designating it as such would be an economical and yet very productive way to go. The exorbitant spending philosophy of the past have got to end and this project is a good place to start. The site could be stabilized and securely fenced, posted and left for the birds. We don't need those few square feet of land badly enough to justify the expense of a total cleanup.

Very Sincerely,

Ron Hinz
1808 Riverside Dr.
W. Richland, WA 99352

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