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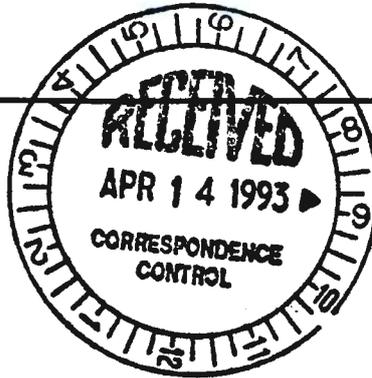
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United States Government
memorandum

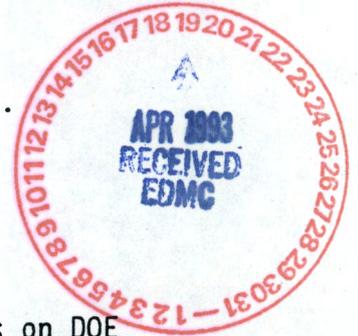
Department of Energy
Richland Field Office



DATE: APR 01 1993
REPLY TO:
ATTN OF: ERD:RKS\93-ERB-127

SUBJECT: SODIUM DICHROMATE EXPEDITED RESPONSE ACTION (ERA) - REMOVAL OF LANDFILL WASTE PER ACTION MEMORANDUM (AD) DATED MARCH 8, 1993

TO: Jane L. Monhart, Director
Richland Operations Division
Office of Northwestern Area
Programs, EM-442, HQ



This memorandum provides information to address EM-442 concerns on DOE Richland Field Office's (RL) determination to comply with the recommended alternative of the excavation of all anomalies and disposal of the materials at the central landfill for the Sodium Dichromate ERA as described in the subject AD. The following information was considered as primary logic prior to proceeding with the alternative.

- The U.S. Environmental Protection Agency (EPA), and the State of Washington Department of Ecology (Ecology) recommend clean closure with unrestricted use of the Sodium Dichromate Barrel Landfill (Landfill) in the 100-IU-4 Operable Unit (OU) at 100 Areas as the objective of the ERA.
- Completing action on this Landfill could provide us with an Interim Record of Decision (ROD) for the OU in advance of the current schedule with a minimal expenditure of funds. Ultimately, our goal is to take such action that no cleanup at this OU would be required for final ROD and, when and if the land were excessed.
- The 40 CFR 300, Subpart E; Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement), Part 3, Article XIII, Section 38; Comprehensive Environmental Response Compensation and Liability Act; the State of Washington Model Toxics Control Act do not specifically require clean closure for an interim action.
- In excessing land, we have learned that the General Services Administration requires that the land must be available for unrestricted use.
- EPA/Ecology has taken a position that RL is required to either excavate the anomalies or perform a Remedial Investigation/Feasibility

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Study (RI/FS) for them to certify whether remediated lands meets the criterion of unrestricted use.

- Westinghouse Hanford Company (WHC) has calculated that it would be more economical to go ahead excavate the anomalies than to develop and implement a required RI/FS.
- A conservative qualitative risk assessment performed in accordance with the Draft Hanford Risk Assessment Methodology estimated the risk at $1E-05$ assuming all chrome is Cr^{+6} . This risk number may or may not support excavation at the site.
- Another alternative would be to challenge the EPA/Ecology position in the AD on the basis of their requiring unneeded actions for debris and sanitary wastes. However, this would probably have to be done at this point by invoking the dispute clause of the Tri-Party Agreement.
- We determine that taking this alternative path would be inappropriate. We may create adverse public opinion by advancing this issue to dispute resolution after the public review because a majority of public responses favored removal. As you know, the AD reflects the public input to the process in addition to the regulators position. We believe that DOE could be a stronger position to argue the issue of sanitary landfill exhumation as an invalid remediation option for other highly visible activities in the very near future (e.g., North Slope/Arid Lands Ecology sites), when costs will clearly be a more definitive variable. The impacts of EPA/Ecology making similar decisions on these sites could clearly provide DOE with a legal basis to pursue the issue of nonuniform application of federal and state regulations at Hanford.
- The removal field activities should verify that DOE alternative presented in the ERA proposal as correct option for this location.
- In performing the ERA, a number of field screening analytical techniques for Cr^{+6} in soil are being tested. The data obtained will be used to support 100 Area Treatability Study requirements.

We believe that the above information provides the basis for proceeding with field activities as specified in the AD.

Please be advised that field activities were temporarily halted due to the discovery of asbestos type material in the soil. Subsequent analysis identified the material up to be 80% chrysotile. The original characterization sampling of the same anomaly did not have any visible material of this type. The WHC ERA Project team reevaluated the situation and reinitiated the removal work as of March 30, 1993.

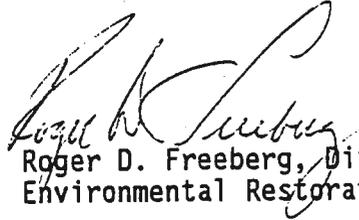
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Jane L. Monhart
93-ERB-127

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APR 01 1993

If you have any questions regarding this ERA, please contact J. K. Erickson on (509) 376-3603.


Roger D. Freeberg, Director
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Subject: SODIUM DICHROMATE EXPEDITED RESPONSE ACTION (ERA) REMOVAL OF LANDFILL WASTE PER ACTION MEMORANDUM (AD) DATED MARCH 8, 1993

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