



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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December 12, 1997

Mr. James E. Rasmussen
U.S. Department of Energy
P.O. Box 550; MSIN: A5-15
Richland, WA 99352

Mr. Michael C. Hughes
Bechtel Hanford, Inc.
3350 George Washington Way; MSIN: H0-09
Richland, WA 99352



Dear Messrs. Rasmussen and Hughes:

Re: Contained-In Determination for Contaminated Concrete Debris from the 300 Area Process Trenches (APT) Weir Structure

The Washington State Department of Ecology (Ecology) and the U.S. Environmental Protection Agency (EPA) have completed their review of the letter summary (# 053359 to S. M. Alexander and D. R. Sherwood from J. E. Rasmussen and M. C. Hughes, dated November 20, 1997) which was received in November 1997. The summary provides agreements made by Ecology, EPA, and the U. S. Department of Energy (USDOE) during a recent data quality objectives (DQO) meeting held in October 1997. The DQO meeting resulted in a sampling and analysis plan to determine whether the 300 APT concrete weir structure is considered mixed waste debris or could be de-regulated (for hazardous waste components only) by implementing the hazardous debris contained-in policy. Given the amount of site information already available, a biased non-statistical sampling approach was agreed to.

Currently, there are no standards that are routinely used to define contained-in concentrations for concrete. However, Ecology believes soil cleanup levels determined under the Model Toxics Control Act (MTCA, WAC-173-340) using residential exposure assumptions (MTCA method B values) represent very conservative assessments of the potential exposure risks posed by concrete. Therefore, all analytical results provided in the summary were compared to values found in *The MTCA Cleanup Levels and Risk Calculations (CLARC II), Update February 1996*.

Based on review of the analytical results provided in Table 1 of the summary, Ecology (with EPA concurrence) will grant the contained-in determination. No Listed or

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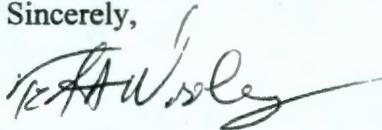
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Characteristic waste codes are applicable to the 300 APT concrete weir structure, therefore, this waste is no longer considered hazardous. In accordance with the Record of Decision, disposal should be into the Environmental Restoration Disposal Facility (ERDF) since it should be the most cost effective disposal option while still being protective of human health and the environment.

Please note, because data validation has not yet been performed, the decision to grant the contained-in may be revisited if the data presented in the summary is rejected or heavily qualified.

If you have questions or concerns please contact Ted Wooley at (509) 736-3012, or Dave Einan of EPA at (509) 376-3883.

Sincerely,



Ted A. Wooley, 300 APT Project Manager
Nuclear Waste Program



David R. Einan, 300 Area Project Manager
Environmental Protection Agency

TAW:DRE:ch

cc: Bob Mcleod, USDOE
Rich Carlson, BHI
Charlie Johnson, BHI
Administrative Record: 300 Area Process Trenches

bcc: Moses Jaraysi, Ecology
Ron Skinnarland, Ecology
Jeanne Wallace, Ecology