

CHRISTINE O. GREGOIRE
Director



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DEPARTMENT OF ECOLOGY

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September 26, 1989

Mr. Roger Freeberg, Hanford Project Manager
U.S. Department of Energy
Richland Operations Office
P.O. Box 550
Richland, Washington 99352

RE: **Response to Notification of Work Activities for the
100-HR-1 and 100-HR-3 Operable Units**

Dear Mr. Freeberg:

This letter serves to confirm the phone conversation I had with Mr. John Broderick on September 18, 1989 concerning proposed non-intrusive tasks to be conducted at the subject operable units prior to approval of the RFI/CMS 100-HR-1 and 100-HR-3 Operable Unit Work Plans.

The Department of Ecology approves all activities defined in your September 8, 1989 letter with the exception of Subtask 1f - Septic Tank Sludge Sampling and Analysis. Considerations for Ecology not approving this subtask includes the following:

- 1) An accurate location for the two tanks in question, 1607-H-2 and 1607-H-3, has yet to be determined.
- 2) The depth to the tanks has yet to be determined. There is no indication of how extensive the "limited amount of excavation" cited in your letter will be.
- 3) Characteristics of the soils overlying these tanks have yet to be defined. Representative and accurate unit-specific soil and vadose zone characterization within the operable unit are at issue.
- 4) A surface radiation survey, and soil sampling and analysis, identified in the draft 100-HR-1 Work Plan as Subtasks 3a and 3b, respectively, should be conducted prior to initiating excavation in order to determine the nature and extent of contamination at these units.



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Mr. Roger Freeberg
September 26, 1989
Page 2

It is noted under paragraph 2.1.4.2 of the draft 100-HR-1 Work Plan that 1607-H-2 Sanitary Septic System "served the 182-H, 183-H, 190-H and several 1700-H office and maintenance service buildings." The contaminants of concern associated with these facilities are documented sufficiently that investigative activities in this area should proceed with caution.

- 5) There is, at best, a generalized description of proposed sampling and analysis procedures found in the last paragraph of page WP-125, and on pages SAP-8,9 of the Field Sampling Plan; more specific information defining how the sludge (or liquids) in the tanks is to be sampled should be provided prior to initiating sampling. For example, what is a representative sample in this case? Does access necessarily preclude options to spatial configuration of the samples? What procedures would be used should liquids be found in the tank(s)?
- 6) ~~This activity as proposed is not within the spirit or letter of the definition of "non-intrusive" as defined under Section 7.3.2 of the Action Plan.~~

There also appears to be uncertainty as to the media from which data are to be derived from this exercise. For example, on page WP-125, next-to-last paragraph, it is assumed that sludge will be found; on page WP-128, third paragraph, a procedure for handling any liquids found in the tanks (a good contingency note) is found; and on page WP-132, second paragraph, the possibility of no sludge being found is raised. Given that the tanks have not been used in nearly 25 years, this uncertainty is not surprising. Are there methods available to refine the expectations of depth and general physical characteristics of wastes in these tanks?

In summary, it is prudent to obtain more precise information concerning the proximate environment for these tanks before attempting to sample tank sludges. This is particularly true if excavation is to be done with a backhoe, as implied on page

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Mr. Roger Freeberg
September 26, 1989
Page 3

WP-125, and specifically mentioned at the September 13 Unit Mangers Meeting. Additional information should also be provided to verify what is most likely to be found in the tanks, and sampling procedures defined accordingly.

Sincerely,



Larry Goldstein
CERCLA Unit Supervisor

LG:tkr

cc: John Broderick
Roger Stanley
Paul Day
Toby Michelena

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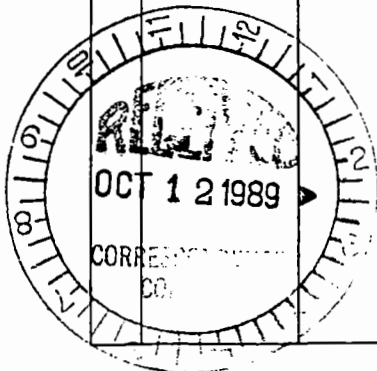
Subject RESPONSE TO NOTIFICATION OF WORK ACTIVITIES FOR THE 100-HR-1 AND 100-HR-3 OPERABLE UNITS

10/10/89JLW:dh

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OCTOBER 4, 1989

MEMO TO: SUSAN WRAY, WHC-EDD

FROM: JOHN BRODERICK, DOE UNIT MANAGER, HR-1



SUBJECT: ADMINISTRATIVE RECORD FILE

REFERENCE: Letter from Larry Goldstein, Washington Department of Ecology, to Roger Freeberg, DOE, RE: Response to Notification of Work Activities for the 100-HR-1 and 100-HR-3 Operable Units, dated September 27, 1989.

Please place the reference letter (attached) into the administrative Record File for Operable Units HR-1 and HR-3.

cc: Mike Thompson, w/o attach

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