

START

0029270

9305530



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

June 18, 1993



Gordon Rogers
1108 Road 36
Pasco, Washington 99301

Re: Riverland Expedited Response Action Proposal Comments
Response

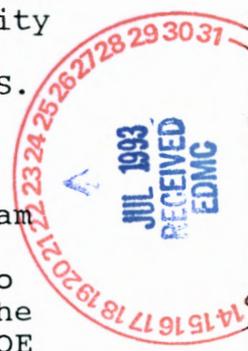
Dear Mr. Rogers:

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 are, therefore, eliminating 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.



9312972-022

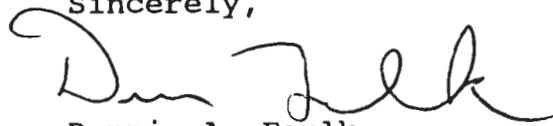
The three parties have agreed to use the observational approach (i.e., characterize as you go) to determine the extent of contamination. This is particularly important for the drain field from the riverland rail wash pit.

The other alternative the three agencies are faced with is to determine the extent of contamination 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)



9312972.0423

Gordon J. Rogers

1108 Road 36
Pasco, WA 99301

Telephone (509) 547-7403

June 1, 1993

Mr. Dennis Faulk
U.S. Environmental Protection Agency
712 Swift, Suite 5
Richland, WA 99352

Dear Mr. Faulk:

I wish to submit the following comments on the Proposed Engineering Evaluation and Cost Analysis for the Riverland Expedited Response Action. My comments are offered as a private citizen and taxpayer and not on behalf of any organization or business.

At the outset, my opinion is that the cost of the cleanup for this site is very excessive considering the trivial levels of pesticide and diesel/motor oil found during screening sampling. The cleanup standards imposed by the Model Toxics Control Act are certainly safe; but they totally ignore the relatively minor health and environmental hazards of these biodegradable contaminants.

I believe the high cost of cleanup of such sites to pristine condition is not justified by any assessment of realistic health and environmental benefits of such an expensive effort. The Hanford cleanup of the major sites will only be made less likely if we waste money on these peripheral sites where the hazards are really trivial.

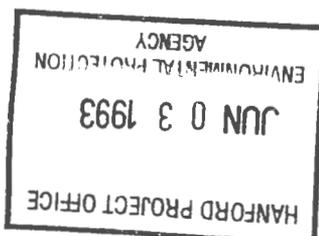
I recognize that you are driven by existing laws and regulations in proposing actions. I have made and will continue to make appeals to our elected officials at the state and federal levels to re-assess the cleanup standards, and to base actions on a risk based prioritization of sites. The current attempt to achieve a zero risk society without consideration of the cost to the taxpayers is simply not acceptable; and I don't believe the public can be hoodwinked into paying for it when there are so many other higher priority needs that pose real risks to health and safety today.

I would propose that you collect the pesticide containers for transport to an approved disposal site, ignore the diesel and motor oil on the Maintenance Facility concrete, take a few confirmatory samples at the pesticide site and wash the residue into the soil with water if the residues are at excessive levels. It just doesn't make sense to drum up soil and truck it to the Arlington, OR disposal site. After all, none of the current sites are designed to assure that nothing can reach the environment for decades or centuries, let alone millenia. In fact, the Arlington site may be a greater long term threat to the Columbia River than Hanford considering the enormous tonnage of hazardous materials disposed there.

I trust that your final ERA Plan will address these points. Thank you for the opportunity to submit comments on this issue.

Sincerely,

Gordon J. Rogers



CORRESPONDENCE DISTRIBUTION COVERSHEET

Author: D. A. Faulk, EPA Addressee: G. J. Rogers Correspondence No.: Incoming : 9305530

Subject: Riverland Expedited Response Action Proposal Comments Response

INTERNAL DISTRIBUTION

Approval	Date	Name	Location	w/att
		Correspondence Control	A3-01	X
		B. A. Austin	B2-35	
		G. C. Henckel	H6-04	
		H. E. McGuire, Level I	B3-63	
		P. J. Valcich	H6-04	
		R. D. Wojtasek, Assignee	H6-27	
	(Original)	EDMC	H6-08	X
		PJV LB	H6-04	X
		Field File Custodian (Riverland ERA)	H6-08	X

9312972.0425

