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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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August 21, 1992



Mr. R. K. Stewart
U.S. Department of Energy
P.O. Box 1970, MSIN: A5-19
Richland, WA 99352

Dear Mr. Stewart:

Re: Sodium Dichromate Barrel Disposal Landfill
Expedited Response Action (ERA) Project Plan

Ecology, along with the U.S. Environmental Protection Agency (EPA) as support agency, has completed the review of the Sodium Dichromate Barrel Disposal Landfill Expedited Response Action (ERA) project plan. The review comments indicate further clarification of certain areas is required. In addition, a detailed sampling and analysis plan (attachment 1) describing specific locations of sampling, number of samples to be taken, types of equipment and method(s) to be used, decontamination procedures to be followed, etc., must be submitted.

In order to facilitate expedited resolution of these comments, it would be in the best interest of all parties to have a meeting at the earliest convenience. If you have any questions please do not hesitate to call me at (509) 546-4301.

Sincerely,

Nancy Goswami for

Dib Goswami
Unit Manager
Nuclear and Mixed Waste Management Program

DG: sl
Enclosure

cc: Darci Teel, Ecology
Paul Beaver, EPA
Larry Goldstein, Ecology
[Redacted]
Administrative Record



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Comments on Sodium Dichromate Barrel Landfill Expedited Response
Action Project Plan

1. Section 1.2 : Page 1, 2nd paragraph

The text identifies only one primary assumption in developing an unofficial site description. What are the other primary, as well as secondary assumptions? This needs to be incorporated.

2. Section 1.2: page 1, 4th paragraph

The last sentence of this paragraph should include the information obtained from various surveys, which concludes that the site has been used for landfill; and four major buried waste sites have been discovered from EMI and GPR data (as per ref. Section 2.3.2; page 12).

3. Section 1.2: page 1, 6th paragraph

Results of the earlier radiation survey need to be incorporated.

4. Section 1.2: page 1, 7th paragraph

If available, the text should offer explanations on the bare patches observed in the Hanford area.

5. Figure 2: page 3

The debris types found at "W" and "X" are not correctly shown in the figure. This needs to be corrected.

6. Section 1.3: page 5, 1st paragraph

The statement "non-time critical" should be removed. The ERA's goal is to expedite the clean-up action of these sites as soon as possible.

7. Section 2.2: page 7 last paragraph

This section should elaborate how the various anomalies found will be resurveyed for better definition of these sites. It should include the detailed methods of survey, the types of survey, grid patterns, etc., that will be implemented in this process. The initial reconnaissance grid pattern of 20 to 40 ft. for GPR as well as EMI is very wide considering the size of the barrel and other debris. It is quite likely that more anomalies of smaller size are present at the site. A future survey program must incorporate these deficiencies.

8. Figure 6: Page 10

Figure 6. must mention the grid interval used in obtaining the data.

9. Section 2.3.2: page 12

The text should mention that the details of the sampling plan and field activities would be reported separately.

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10. Section 3.0: page 12

The text describes that this section would provide information on screening of remedial action alternatives based on certain preliminary models. However, nothing was mentioned regarding the alternatives and model. The entire text needs to be modified accordingly.

11. Section 3.2: page 13

Remove the first bullet since some actions were already taken (eg. removal surface debris).

12. Section 7.0: page 15

Both regulatory agencies are of the opinion that the project schedule shown in Figure 8. is too long and is not acceptable. The project should be completed by the end of 1993 or by the beginning of 1994.

13. Attachment 1: Sampling and Analysis Plan:

This part of the document must be rewritten to describe actual methods of sampling, schedule, and details on sampling procedures/protocol. Location of each site must be identified with maps. Criteria for when a sample will be taken and the minimum number of samples that will be taken at each location with a tentative time schedule must be provided. The description must also include the actual methods of sampling, decontamination procedures, and methods of handling the waste generated during this sampling event. Field screening of volatiles using OVM must be used at the site.

Since the sample analysis plan needs to be rewritten, no such specific comments are presented at this time.

14. Attachment 6: Community relations Plan: page 6-i

There is no community relations plan attached to the document.

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Subject: SODIUM DICHROMATE BARREL DISPOSAL LANDFILL EXPEDITED RESPONSE ACTION (ERA) PROJECT PLAN

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