

START

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

1315 W. 4th Avenue • Kennewick, Washington 99336-6018 • (509) 735-7581

November 18, 1996

Mr. Rich Holten
U.S. Department of Energy
Richland Operations Office
P.O. Box 500
Richland, WA 99352



Dear Mr. Holten:

Re: In-Situ Treatment Zone (ISTZ) Treatability Test

The Washington State Department of Ecology (Ecology) has reviewed information provided by your staff concerning the U.S. Department of Energy's (USDOE) proposal to conduct a treatability test at the N Springs Area. The ISTZ test plan consists of the excavation of a 3' wide, 30' deep, 100' long trench at the Columbia River's edge. Once excavated, the void space would then be backfilled with 20' of clinoptilolite (a cation absorbing zeolite mineral), creating a permeable wall, which would allow groundwater to pass through while absorbing strontium-90. The remaining upper 10' of trench depth would be filled to surrounding grade with native soil. The test design included a sampling and analysis plan aimed at demonstrating the zeolite could be emplaced without compaction, excessive fines generation, channeling, or effecting co-contaminant. During the one year test period, samples collected from peizometers placed within the clinoptilolite would also be analyzed to confirm the predicted contaminant loading on the zeolite.

Funding for the test project would be shared jointly by USDOE Environmental Restoration (EM-40) and Technology Development (EM-50). However, recent project changes would necessitate significantly greater funding from EM-40 relative to EM-50.

As a participant in the initial planning meetings, stakeholder workshop, and subsequent public comment period, Ecology appreciates the efforts which have allowed interested shareholders to evaluate the proposed test and provide comments and concerns. As a result of our careful evaluation of the project, including concerns raised during discussions, public comments received on the test plan, and responses to public comments provided by USDOE, Ecology does not view implementation of the ISTZ treatability test a wise use of limited Environmental Restoration dollars, at this time. Issues associated with the full scale implementation of the ISTZ need to be reconciled before this treatability test is performed. The issues include the potential for environmental impacts, regulatory consistency with surrounding cleanup requirements,

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application and compliance with applicable or relevant and appropriate requirements, long-term institutional controls, and integration of remedial alternatives, which address all contaminants of concern.

One of USDOE's original objectives of the ISTZ treatability test was to provide cost, constructability, and hydraulic performance input into the 100-NR-1 & 2 Corrective Measures Study, which is due to Ecology by November 30, 1996. Because of recent schedule changes, this important objective can no longer be met. In addition, Ecology plans to issue an Interim Record of Decision for 100-NR-1 & 2 by Fall 1997. Since there is such uncertainty in all alternatives for long-term groundwater remediation and river protection at the 100-N Area, Ecology does not support the implementation of the ISTZ treatability test. Cancellation of the ISTZ treatability test will allow all issues associated with full-scale implementation of the ISTZ, and the other long-term remedial measures, to be more fully evaluated before a decision is made to commit cleanup dollars to long-term groundwater remediation and Columbia River protection.

Please respond in writing with your acceptance of this recommendation. Should you or your staff have questions or concerns regarding this project, please do not hesitate to contact me at (509) 736-3029.

Sincerely,



Phillip R. Staats
Project Manager
Nuclear Waste Program

PS:skr

cc: Doug Sherwood, EPA
David Olson, USDOE
Mike Thompson, USDOE
Donna Powauke, Nez Perce
Russell Jim, YIN
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Greg DeBrueler, CRU
Administrative Record: In-Situ Treatment Zone ✓