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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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

October 20, 1999

Mr. Douglas Sherwood
U.S. Environmental Protection Agency
712 Swift Boulevard, Suite 5, MSIN: B5-01
Richland, Washington 99352



Dear Mr. Sherwood:

The Washington State Department of Ecology (Ecology) has reviewed the Explanation of Significant Difference (ESD) submitted by the U.S. Environmental Protection Agency (EPA) for Ecology's approval. Ecology has also reviewed data provided by EPA that were used to support the land disposal restriction treatment standard variance. Ecology has formulated language to replace the information currently found in the ESD under the heading 'Support Agency Comments'. The replacement language is enclosed. Once this language has been placed into the document, Ecology will sign the ESD.

Ecology has expressed concern over current cleanup actions in the 300 Area. This concern is based upon:

- The selection of cleanup standards that are protective of groundwater; and
- The recently recognized identification of Hanford contamination affecting a nearby drinking water supply well for the city of Richland.

Given the proximity of the 300 Area to local groundwater, drinking water sources, and, ultimately, the Columbia River, it is necessary for all environmental agencies to guarantee that the environment and local resources are being adequately protected from Hanford contamination.

If EPA should decide that Ecology's agreement is no longer necessary, please remove the section labeled 'Supporting Agency Comments' and the Ecology signature page from the ESD. If you have any questions concerning this matter, please contact Dr. Alex Stone, Ecology's 300 Area Project Manager, at (509) 736-3018.

Sincerely,

Mike Wilson, Manager
Nuclear Waste Program

Enclosure

cc: See Next Page



cc: Dave Bartus, EPA
Judy Schwartz, EPA
Dave Einan, EPA
Bob MacLeod, USDOE
Marilyn Reeves, HAB
Wade Riggsbee, YIN
Mary Lou Blazek, OOE
Administrative Record: CERCLA 300-FF-1



**Ecology Language for Submittal in the 300-FF-1 Landfill 1D
Explanation of Significant Difference**

The Washington State Department of Ecology (Ecology) supports the removal of the lead and uranium contaminated waste and soil from the Landfill 1D and placing the contaminated soil in the Environmental Restoration Storage Facility (ERDF). Therefore, Ecology supports the issuance of a waiver by the U.S. Environmental Protection Agency (EPA) to allow ERDF to accept the uranium and lead contaminated waste and soil.

Ecology understands removal of the lead and uranium contaminated waste and soil at Landfill 1D is incomplete. Remaining lead and uranium contaminated waste and soil will be removed from the northwest and southwest portions of the landfill to a total depth no less than thirteen (13) feet below landfill grade.

Ecology has also been informed that confirmation sampling related to this site has not been performed. After the review of the information provided, only field screening data is available to verify the completed remediation of Landfill 1D. In addition, the average lead values reported in this ESD appear to include a mixture of field screening data and laboratory analyses and as such do not provide an accurate representation of the lead contamination in Landfill 1D. As field-screening data cannot be used to verify contamination removal, confirmatory sampling will be performed to document remaining contamination levels. Furthermore, as the Sample and Analysis Plan (SAP) for Landfill 1D must be updated to reflect the addition of lead as a constituent of concern, Ecology will review and comment on the updated SAP. Ecology will also take split samples once the verification sampling effort begins. The cleanup level for lead must be demonstrated as protective of all pathways in the 300 Area including impacts to flora, fauna, groundwater, drinking water and, ultimately, the Columbia River. These factors must be addressed before a defensible lead cleanup level can be established.

Ecology also understands the 300-FF-1 Record of Decision (ROD) did not establish remedial action objectives for lead at Landfill 1D. Due to the discovery of lead contamination at Landfill 1D, the landfill's proximity to the Columbia River, and the landfill's proximity to groundwater, Ecology expects a second ESD will be developed to establish the cleanup level for lead at Landfill 1D.

Ecology is approving this Explanation of Significant Difference as required by the Comprehensive Environmental Restoration and Cleanup Liability Act (CERCLA) to allow transfer of the currently identified contaminated waste and soil into ERDF. This concurrence does not include any agreement upon the cleanup levels for lead at Landfill 1D. Ecology concurs with the scope of this ESD as stated in the September 28, 1999 letter from the EPA "[T]he sole purpose of the Explanation of Significant Difference (ESD) is to grant a variance to the land disposal restriction treatment standards to be applied at one waste site in the 300-FF-1 Operable Unit." Ecology will remain actively involved in the final resolution of the issues associated with the discovery of lead in Landfill 1D.