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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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

October 25, 1994

Mr. Paul J. Krupin
Acting Hanford Project Manager
U.S. Department of Energy
Richland Field Office
P. O. Box 550
Richland, WA 99352



Dear Mr. Krupin:

Re: Soil Washing Field Test Procedure for the 100-DR-1 Operable Unit, ³⁷⁰⁴⁰
Document Number WHC-SD-EN-TI-255 Rev. 0

The Washington State Department of Ecology (Ecology) has reviewed the above referenced document and is providing you with our comments. The applicable section precedes the comment and suggested resolution.

General Comments

Page 1-6, Section 1.1.5

Deficiency: The section is unclear and tends to leave the reader confused as to what the TPLs are and why they were chosen. Perhaps rewording the paragraph and including both tables would help clarify this.

Recommendation: A suggested rewrite would be, TPGs for the test will be the accessible soil levels for . . . included in Table 6.2 of WHC-CM-7-5 (T-1). The results of the testing will be evaluated over a range of levels established by those in T-1 and the levels included in Table K-1 WHC 1988a (T-2) which would establish the lower boundary.

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Page 1-6, Section 1.1.8

Deficiency: The paragraph indicates the desire to perform testing on water filtration systems. Ecology's concern is the tests be limited to only data necessary to conduct this soil washing test. It is recognized additional testing during the RA/RD phase may become necessary.

Recommendation: Please revise the paragraph to include the limited scope of the testing to be performed.

Figure 1-1

Deficiency: The figure does not correspond to Table 1-1. Lines 13 through 20 are not specified on Figure 1-1.

Recommendation: Ensure the figure and the table are consistent.

Page 1-7, Section 1.1.9

Deficiency: This section states contaminated soils will be handled appropriately and processed and unprocessed clean soils will be placed back into the original excavation site. An explanation of how and at what level the determination of "clean" is made should be included in this section.

Recommendation: In addition to the inclusion of a clean determination, it is inherent on our part to inform you in the absence of other defining levels, Ecology will be using the draft Department of Health radionuclide levels for residential soils transmitted to you under the cover letter dated April 18, 1994, as the determinant concentration of clean soils.

Figure 2-1

Deficiency: The figure shows placement of the contaminant and clean soil piles in what would be an operationally opposite position if the treatment system is logically placed on the drawing. In addition, the prevailing winds at Hanford are from the west, which would place the clean pile downwind of the excavation site.

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Recommendation: Re-evaluation of the site configuration with respect to operational and prevailing physical conditions would seem prudent.

Should you have any questions, please do not hesitate to contact me at (509) 736-3029.

Sincerely,



Phillip R. Staats
Unit Manager
Nuclear Waste Program

PS:skr

cc: Nancy Werdel, USDOE
Dennis Faulk, USEPA