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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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January 31, 1995

Ms. Ellen Mattlin
U. S. Department of Energy, Richland Office
P. O. Box 550, MS A5-15
Richland, Washington 99352



Dear Ms. Mattlin:

I have evaluated the 2727-S Nonradioactive Dangerous Waste Storage Facility Clean Closure Evaluation Report (WHC-SD-EN-TI-242, Rev 0). Based on this report and responses to the questions I asked about the report (see the 2727-S Nonradioactive Dangerous Waste Storage Facility Clean Closure Evaluation Report Comment Response Table), I have determined that cleanup activities which have been accomplished are within the standards of the Model Toxics Control Act (MTCA) Method B for residential use. Also, based on the report and the responses to questions, I have the following comments:

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- The text brought out that a "Field Log Book" had information not transferred to the report. Also, the Sampling Authorization Forms (SAF 92-262 and SAF 92-309) were described but not provided. Upon my request these were provided as was a "Decommissioning Log Book" all of which contained information germane to the cleanup activities conducted at the facility. These sources were included in my evaluation of the adequacy of the cleanup.
- I agree with the conclusion that sample analyses showed no contamination that exceeded appropriate MTCA levels for a facility cleaned up to residential standards. However, I do not agree with all evaluations of analytical results (contained in Chapter 2 of the report), which led to the conclusion. I feel the need to respond to two of those evaluations as follows:

- As to the nine polycyclic aromatic hydrocarbons (PAH's) detected in a single sample (B07556), to lay each off as not exceeding the MTCA Method A cleanup level (whether or not PQL levels are involved) is an incorrect approach. Except for the few contaminants which have a MTCA Method A but no Method B cleanup level established, Method A should not be employed in conjunction with MTCA Method B when setting or evaluating a cleanup. Method A is designed to evaluate cleanup of a single or very few contaminant(s) and, therefore, is not

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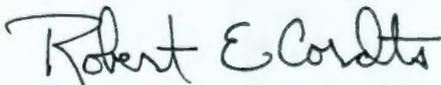
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appropriate where many contaminants are involved. Although following Method B establishes most of these contaminants (from sample B07556) cleanup levels at 137 parts per billion (ppb), I do not consider the recorded less-than-PQL results (which do exceed 137 ppb) to require additional cleanup at the site. I accept the reasoning that these are photosensitive materials which have no reasonable explanation as to having continued existence at one site in the soil out of 26 sampled sites of this unit. Therefore, they are presumed to be results from a spurious sampling event.

- As to the rejection of selenium and thallium sample analyses, this was done even though apparently one sample showed acceptable results at matrix spike and one had no spike added. While the comment in the Clean Closure Evaluation Report Comment Response Table is not entirely correct (some regions of the country do have natural selenium levels which are an environmental concern), selenium is not normally of interest in this region. Also, since valid results of sampling for inorganic contaminants are generally satisfactory, there is no reason to think that selenium would selectively escape containerized storage particularly to reach a level to require additional cleanup. While thallium has a much lower MTCA Method B cleanup level than does selenium, there has been no record of thallium being included as a constituent in the waste managed at this site. Therefore, there should be no concern for thallium as a contaminant at this site, considering its absence as a waste constituent, the waste handling practices of the facility, and the cleanup which has already occurred.

I expect that the final filling and grading, etc., at the site should occur within the 180 days given in the permit, essentially by the end of March 1995. After all outlined activities have been completed at the site, you have 60 days in which to forward the appropriate certification of closure to us.

Sincerely,



Robert E. Cordts, Unit Manager
Nuclear Waste Program

REC:dr

cc: Scott Luke, WHC