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## Department of Energy

Richland Operations Office  
P.O. Box 550  
Richland, Washington 99352

NOV 03 1994

Mr. Russell Jim  
Confederated Tribes and Bands  
of the Yakama Indian Nation  
P.O. Box 151  
Toppenish, Washington 98948

Dear Mr. Jim:

CONFEDERATED TRIBES AND BANDS OF THE YAKIMA INDIAN NATION (YIN) COMMENTS ON  
118-B-1 EXCAVATION TREATABILITY TEST PLAN (DOE/RL-94-43)

Thank you for providing comments on Draft A of the subject document. Enclosed is a copy of Revision 0 of this document for your use.

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This treatability test was selected under "Guidance for Conducting Remedial Investigations and Feasibility Studies under CERCLA" (OSWER Directive 9355.3). Under this guidance, treatability studies are conducted primarily to achieve the following:

- Provide sufficient data to allow treatment alternatives to be fully developed and evaluated during the detailed analysis and to support the remedial design of a selected alternative;
- Reduce cost and performance uncertainties for treatment alternatives to acceptable levels so that a remedy can be selected.

The scope of this treatability test was determined through a consensus forum. This forum utilized the Streamlined Approach for Environmental Restoration (SAFER) process. Six scoping meetings were held between January 13, 1994, and February 15, 1994, to define the test objectives and data needs. The U.S. Environmental Protection Agency, Region 10, and the State of Washington Department of Ecology personnel were in attendance at these meetings.

The timing for this treatability test was based on information needed for development of an approach for remediation of all burial grounds in the 100 Areas. The agencies will use this test to identify the types of waste media, determine the amount of overburden and depth of the waste material, test analytical screening techniques, identify types of contamination, and identify the needs for segregation, decontamination, and compaction of wastes. This test is being done in support of several 100 Area proposed plans and focused feasibility studies that are currently being prepared, and records of decision and remedial designs that are scheduled to begin in FY 1995. Additionally, information gained from this test will help in future Environmental Restoration Disposal Facility (ERDF) design activities, planning for waste disposal transportation, and determining risk to workers and the public during remediation.



Mr. Russell Jim

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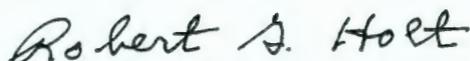
The volume of waste being excavated is a small percentage of the total volume of the burial ground. Waste from this treatability test will be placed back into the burial ground after sorting in an ordered fashion. Various options for disposal of the waste were explored. Based on availability of storage (either at ERDF or other waste disposal facilities), cost of temporary storage, worker and public exposure, and timing of this critical activity, the decision was made to place the waste back into the trench. Since any liquids encountered will not be placed back into the trench, additional spread or mobilization of contaminants would not occur.

Under the provisions of the Hanford Federal Facility Agreement and Consent Order, "wastes generated from the test pits will be managed as 'investigation-derived-waste' or returned to the excavation in a manner that will facilitate final remediation" (see Change Request M-15-93-04). This treatability test is a research, development, and demonstration project (RD&D) under provisions of Washington Administrative Code 173-303-809. RD&D provisions that would act to constrain or eliminate the flexibility intended for RD&D activities, such as restrictive waste disposal standards, would not be applicable. As noted in the test plan, a descriptive and photographic record will be kept of the material excavated, segregated, and returned to the trench to facilitate locating during final remediation.

Additionally, other concerns expressed in the YIN letter will be taken into consideration in determining waste acceptance criteria for ERDF, treatment of waste and development of remediation goals for the 100 Areas in FY 95. The U.S. Department of Energy (DOE) will consult with YIN on each of these issues as they are developed at which time any concerns can be addressed.

DOE would like to extend an invitation to YIN to further discuss their concerns and visit the excavation site in the near future. Should you wish to set a date for consultation or have any further questions regarding this activity, please contact Ms. Nancy Werdel on (509) 376-5500.

Sincerely,



Robert G. Holt  
Acting Hanford Project Manager

RSD:NAW

Enclosures:

1. Protocol for Site Access
2. 118-B-1 Excavation Treatability Test Plan

cc w/o encls:

- R. Cook, YIN
- D. Sherwood, EPA
- P. Staats, Ecology
- J. Woolard, BHI

## Protocol for Site Access

### Site Location: 118-B-1 Burial Ground

Follow perimeter road (outside of the B/C Area Fence) around C Reactor. Road access: turn left at the blue decommissioning sign onto older road and begin driving south. The road will turn west which will lead directly to the burial ground. A parking area will be visible.

**Access to Site:** After parking proceed to administrative trailer, log in, and talk with the Field Team Leader (FTL) or delegate, for further instructions. The FTL, or delegate, will assess work status and direct visitors to accessible areas, check training records, and assure proper personal protective equipment is worn by the visitor. Hard hats and safety glasses will be available for a limited number of visitors. The visitor is required to wear substantial footwear, no tennis shoes (leather, steel-toed boots if access to the exclusion zone is necessary). The training requirements for access to the exclusion area are attached. It is preferred to minimize access to exclusion areas due to the nature of the work being conducted.

**Preferable Visit Times:** Arrival at the site between 7:30 and 8:00 am, or following lunch at 12:30 pm are the preferable times to arrive on site. This will allow FTL time to talk with visitors prior to work start. All visitors must read and understand the Site Specific Safety Plan and Radiation Work Permit prior to entering any work areas. Copies of these documents will be available at the site trailer.

### Training Requirements for Access to Buffer Area Radiation Worker I

### Training Requirements for Access to Exclusion Zone

Access to Exclusion zone limited to those who have legitimate reason for entry (ie. work requirement or regulatory oversight)

- 40-Hr Hazardous Waste Worker
- 3-Day Haz. Waste Wkr. Experience component (or in progress)
- Radiation Worker II
- SKA-PAK
  
- Mask Fit (required every 6 months for lead workers)
- Medical Surveillance Program: Haz. Waste Worker physical
  
- Personnel inside of the Exclusion Zone will need to have a baseline blood lead and cadmium tests through HEHF.
  
- Lead and cadmium training to be taught by Health and Safety during the pre-job meeting.