



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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Mr. Eric Goller
U.S. Department of Energy
P.O. Box 550, Mail Stop A6-95
Richland, WA 99352



Dear Mr. Goller:

RE: Treatability Study Program Plan

Thank you for the opportunity to participate in the selection of the upcoming treatability studies in the 100 Area Operable Units. Currently, the 100-BC-1, 100-DR-1, and 100-HR-1 Operable Unit Work Plans each require a treatability study be performed next summer. During the August 17, 1992, meeting you proposed the following option:

- Perform three laboratory studies on soils from the 116-D-1B and 116-C-1 Trenches:
 - physical separation
 - chemical extraction
 - chemical heap leaching
- Perform treatment studies on the soil washing effluent.
- Perform a pilot scale soil washing treatability study in the 116-C-1 Trench.



Note: All studies will be performed within agreed to time frames.

This proposal included removing the requirement for treatability studies in the 100-HR-1 Work Plan. Ecology believes that the proposed treatability studies should be considered as one treatability study. We also question the need for soil washing lab and bench scale treatability studies. It is Ecology's position that the interim milestones in the 100-DR-1 and 100-HR-1 Work Plans shall remain in place and be supported by useful treatability studies. The U.S. Department of Energy (USDOE) must propose, obtain regulatory concurrence, and implement treatability studies in those Operable Units.

It is also important that all treatability studies are not linked to soil washing. To conclude that soil washing will be the only solution to treatment at Hanford is presumptuous. Should this treatment fail, USDOE would be left

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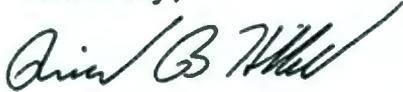
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with no options. Therefore, the treatability studies for the 100-DR-1 and 100-HR-1 Operable Units should include chemical treatment (bench scale) to be used in a soil mining scenario and stabilization/solidification (bench scale) of waste that is considered to be land disposal restricted.

Also, Ecology requires USDOE to transmit the Treatability Study Program Plan. In order to obtain Ecology buy-in to this issue, we must be provided with the document. Any treatability study plan must include provisions for ground water studies. If ground water is not included, Ecology will consider the plan as informal/draft and will not participate further.

Thank you for considering this matter. Please call me at (206)493-9367 to arrange future meetings.

Sincerely,



Richard B. Hibbard, P.E.
CERCLA Unit Engineer
Nuclear and Mixed Waste
Management Program

RH:dr

cc: Paul Day, EPA
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Steve Wisness, USDOE
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Subject: TREATABILITY STUDY PROGRAM PLAN

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