

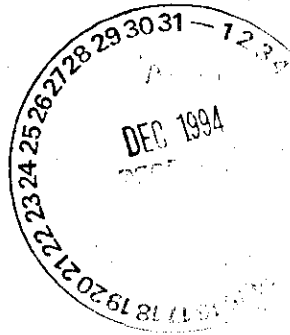
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11/21/94

Pam Innis
US-EPA
712 Swift Ave. #5
Richland, WA. 99352



Re: ERDF Columbia River United (CRU) Comments:

- The Waste Selection Criteria must be designed to limit the total amount of waste. Emphasis must be put on waste reduction/compaction and recycling. The goal must be to limit the overall size of ERDF.
- The regulators need to tell the public what they propose to do with the soil that does not meet the current Curie Content of ERDF. CRU feels that this is one factor that has not been discussed and is a critical part of the entire site remediation. Are the regulators proposing to build another site that will store this HOT soil until further remediation can be done?
- The only way that you can assure worker and public safety is to monitor with Continuous Air Monitors (CAM's). These monitors must be installed at all remediation sites and ERDF. To do anything less is putting the workers and the public at risk. We must keep in mind that worker safety is a number one priority!
- Dust mitigation must be done with the best available technology. The Hanford site is extremely dry and is noted to have very high winds. The Dust Mitigation Study (DSM) has some erroneous assumptions about the threshold velocities for ERDF. The threshold wind speeds of 36 mph for untreated ERDF soil and 42 to 53 mph for treated ERDF soil does not even come close to protecting the workers. It is amazing to find out that when Wal-Mart was under construction the stop worker order was in place at winds much lower. The DSM gives no recommendation as far as work stoppage in relation to wind speeds. The DSM does not take into consideration all the different contaminated sites across the Hanford complex that will be excavated. There is no mention of how we will protect the workers and public from these excavations. More work needs to be done on a comprehensive Dust Mitigation Strategy to assure worker and public safety.

Kind Regards,

A handwritten signature in cursive script that reads "Gregory deBruler".

Gregory deBruler
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FAX TRANSMISSION

Date 11-27-94

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Pages Including Cover Sheet 2

Message ERDF COMMENTS -

WE NEED TO MEET AT THE HABS IF POSSIBLE
TO TALK ABOUT THESE POINTS -

