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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
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January 22, 2013

13-NWP-006

Mr. Mark S. French, Federal Project Director
Richland Operations Office
United States Department of Energy
P.O. Box 550, MSIN: A3-04
Richland, Washington 99352

Re: Letter 13-AMRP-0015, dated November 07, 2012, "Transmittal of Waste Site Reclassification Form N. 2008-001 and Supporting Documentation for the 100-D-63, 100-D/DR Service Water Pipelines Waste Site for the State of Washington Department of Ecology Approval" 1217774

Dear Mr. French:

The Department of Ecology (Ecology) will not approve the Waste Site Reclassification Form for the 100-D-63, 100-D/DR Service Water Pipelines waste site for reclassification to "No Action." As outlined in our comments (September 27, 2012), we feel that colonization of the site with removal of one section of pipe is preferred.

The Remaining Sites Verification Package for this waste site demonstrates that the pipe scale and/or rust samples contain concentrations of metals above direct exposure level remedial action goals. Many of these metals are associated with normal constituents of pipes and can be dismissed.

However, after receiving responses to several detailed questions regarding the pipelines, Ecology still believes it is prudent to remove this section of piping because of the continued concerns below:

- One sample result from the 186 Filtered Water Service Area showed higher concentrations of hexavalent chromium at 7.84 mg/kg (soil cleanup level for direct exposure is 2.1 mg/kg):
  - This appears to be the only scale-and/or rust result from non-service water pipelines in the 100-D, 100-H, or 100-N Areas that has exceeded the soil cleanup level for direct exposure.
  - Ecology is concerned the length of pipe represented by this sample may have come into contact with chromium treated water or contaminated river water.

- Hexavalent chromium is one of the major contaminants in the 100-D Area due to its volume and mobility through the soil column.
- Soil results from below the pipe at this sample point do not exceed background levels, which is a good sign there was no leak at this point in the pipe. However, this does not preclude the possibility of leaks at other locations along the pipe. Removal of the pipe is the only way to ensure that past leaks have been addressed.

- The pipe in question was heavily corroded at Test Pit #13, which also causes concern over the nature of the liquid carried by the pipe and the integrity of the pipe during operations.
- The history of this pipe included at least two separate functions, showing flow in both directions at different times during operations.

Ecology recommends removing this relatively short length of pipe (less than 1000 feet out of the over 90,000 feet represented by the 100-D-63 waste site).

If there are any questions please contact me at 509-372-7941 or Nina.Menard@ecy.was.gov or Alicia Boyd at 509-372-7934 or Alicia.Boyd@ecy.wa.gov.

Sincerely,

for

Nina M. Menard
Environmental Restoration Project Manager
Nuclear Waste Program

ab/tkb

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