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Department of Energy

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

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95-PCA-225

Mr. David L. Lundstrom, Manager
200 Area Section
Nuclear Waste Program
State of Washington
Department of Ecology
1315 West Fourth Avenue
Kennewick, Washington 99336

Mr. Joseph J. Witczak, Unit Supervisor
Regulatory and Technical Support Unit
Nuclear Waste Program
State of Washington
Department of Ecology
P.O. Box 47600
Olympia, Washington 98504-7600

Dear Messrs. Lundstrom and Witczak:

PROCEEDING WITH CLOSURE OF THE 2727-S NONRADIOACTIVE DANGEROUS WASTE STORAGE FACILITY (S-2-5)

With this letter the U.S. Department of Energy, Richland Operations Office (RL) requests Ecology approval that the 2727-S Nonradioactive Dangerous Waste Storage Facility (2727-S) be allowed to close in its current physical state. We believe this would meet the regulatory requirement established at WAC 173-303-610(2)(a)(iii) which states:

"Closure performance standard. The owner or operator must close the facility in a manner that: ... Returns the land to the appearance and use of surrounding land areas to the degree possible given the nature of the previous dangerous waste activity."

Based on prior discussions with Mr. J. J. Witczak and Mr. R. E. Cordts, State of Washington Department of Ecology (Ecology) it is our understanding that Ecology also believes that this standard is already met.



Messrs. Lundstrom and Witczak
95-PCA-225

-2-

MAR 22 1995

If Ecology agrees that the site's current physical condition already meets the closure standard, the 2727-S closure costs shown below will be greatly reduced. While this is a deviation from the closure activities specified in the Closure Plan, RL believes that the significant cost savings described below, considered in conjunction with the fact that the site already meets the regulatory requirement, justify completing the closure activities with no further restoration.

As a condition of the Hanford Facility Resource Conservation and Recovery Act (RCRA) Permit, Part V, Chapter 3, 2727-S closure is to be carried out in accordance with the approved closure plan. Under the closure plan, the 2727-S is being clean closed. Samples taken in the area have confirmed that there is no residual contamination from the TSD operations. The unit is within the 200 West Area that will remain a fenced, controlled access area for the foreseeable future. The area where the waste management activities were conducted currently consists of naturally revegetated ground with several low mounds of unspread backfill. The unit presents no health and safety concerns or nuisance concerns to the general public or to site workers. Thus, it can be safely closed as it currently exists. This would end the physical closure period and allow for immediate closure certification.

The remaining costs associated with closure of the unit are primarily associated with site restoration that includes site backfilling, compaction, grading and revegetation. Closure cost estimates previously provided to Ecology identify the cost of closure to be approximately \$54,000, including \$15,000 for site restoration and \$39,000 for engineering and regulatory support of closure activities. Agreement that the current site conditions meet the regulatory requirements will allow any conserved funds to be redirected to other Hanford facilities where such funds could be better used in reducing risk to human health and the environment. Immediate regulatory closure of this unit would not preclude later restoration of the area as needed in support of future 200 Area land-use planning.

In accordance with the above, we request that Ecology determine that certification of closure of this unit may proceed without further site restoration. Upon receiving your written concurrence, we will proceed with professional engineer (PE) closure certification for this unit. We also request that Ecology reach advance agreements with us for all future treatment, storage, and disposal units that undergo clean closure, to determine if any additional site restoration is needed. This is particularly the case for units included in the RCRA Permit modification currently being processed. This will allow other funds to be focused on reducing risks.

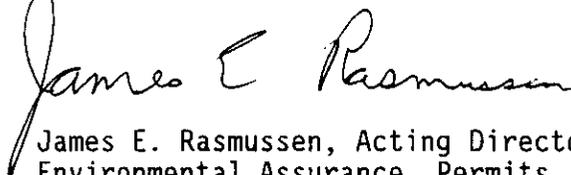
Messrs. Lundstrom & Witczak
95-PCA-225

-3-

22 2 1995

Should you have any questions, please contact Ms. E. M. Mattlin, RL, on (509) 376-2385 or Mr. F. A. Ruck III, Westinghouse Hanford Company, on (509) 376-9876.

Sincerely,



James E. Rasmussen, Acting Director
Environmental Assurance, Permits,
and Policy Division
DOE Richland Operations Office

EAP:CEC



William T. Dixon, Director
Environmental Services
Westinghouse Hanford Company

cc: EDMC, H6-08
R. Cordts, Ecology
W. Dixon, WHC
D. Duncan, EPA
R. Jim, YIN
D. Powaukee, NPT
S. Price, WHC
F. Ruck III, WHC
J. Wilkinson, CTUIR