START

DOE/RL-92-54
Revision 1

UC-630

200 West Area Ash Pit Demolition Site Closure Plan

Date Published
September 1994

United States
Department of Energy
P.O. Box 550
Richland, Washington 99352

Approved for Public Release

THIS PAGE INTENTIONALLY
LEFT BLANK

THIS PAGE INTENTIONALLY
LEFT BLANK

Department of Energy
Richland Field Office
P.O. Box 550
Richland, Washington 99352

95-PCA-001

Mr. David L. Lundstrom
Section Manager, 200 Areas
Nuclear Waste Program
State of Washington
Department of Ecology
1315 West 4th Avenue
Kennewick, Washington 99336

Mr. Douglas R. Sherwood
Hanford Project Manager
U.S. Environmental Protection Agency
712 Swift Boulevard, Suite 5
Richland, Washington 99352

Dear Messrs. Lundstrom and Sherwood:

TRANSMITTAL OF THE 200 WEST AREA ASH PIT DEMOLITION SITE CLOSURE PLAN, REVISION 1 (T-2-2)

The enclosed 200 West Area Ash Pit Demolition Site (Ash Pit) Closure Plan, Revision 1, (T-2-2), and the 200 West Area Ash Pit Demolition Site Closure Plan Notice of Deficiency Comment Response Resolution Table are submitted by the U.S. Department of Energy (DOE), Richland Operations Office (RL) and the Westinghouse Hanford Company (WHC) for review by the State of Washington Department of Ecology (Ecology). Submittal of these documents by October 6, 1994, fulfills the agreement made by RL and Ecology during the Unit Managers' Meeting held May 24, 1994. The State Environmental Policy Act Checklist forms for the Ash Pit Closure Plan, Rev 0, November 1992 have remained unchanged and will not be included in this transmittal. The Part A will be transmitted to the U.S. Environmental Protection Agency (EPA) and Ecology once it is certified by DOE-RL.

Copies of this transmittal will be distributed to representatives of your respective organizations as follows:

- D. L. Duncan, EPA
- F. Ma, Ecology, Kennewick
- Ecology Library, Lacey

THIS PAGE INTENTIONALLY
LEFT BLANK

Should you have any questions or require any additional information regarding this submittal, please contact Ms. E. M. Mattlin of RL on (509) 376-2385 or Mr. F. A. Ruck III of WHC on (509) 376-9876.

Sincerely,

James D Bauer

James E. Rasmussen, Acting Program Manager
Office of Environmental Assurance,
Permits, and Policy
DOE Richland Operations Office

EAP:EMM

William T. Dixon, Manager
Environmental Services
Westinghouse Hanford Company

Enclosure:
1. Ashpit Closure Plan
2. Ashpit Comment Response Resolution Table

cc w/encl:
Administrative Records, WHC
B. Burke, CTUIR
D. Duncan, EPA
R. Jim, YIN
F. Ma, Ecology
D. Powaukee, NPT
S. Price, WHC
F. Ruck III, WHC

cc w/o encl:
W. Dixon, WHC
R. Pierce, WHC
R. Stanley, Ecology

THIS PAGE INTENTIONALLY
LEFT BLANK

No.	Comments/Response	Concurrence
1.	**Deficiency.** The level of detail of several chapters in this closure plan is inadequate. **Requirement.** The closure plan must contain enough detail to allow the evaluation of whether: a. the activities described in the plan satisfy the regulations, or b. the conditions assumed in the plan adequately reflect actual conditions of the unit. RL/WHC Response: Comment is too general to address. The level of detail in this closure plan is similar to the level provided in other closure plans which are nearing final approval by Ecology. Ecology Response: Increasing the level of detail of the closure plan will reduce the amount of time and effort necessary to review and revise the document. As far as comparing the level of detail with other closure plans, thus far no closure plans have been approved and conditions can be written into the plan to address deficiencies noted by the regulators. **Ecology/RL/WHC Resolution: A parties have agreed that with the incorporation of the resolved NOD comments and DQO discussions that the level of detail in the closure plan will be satisfactory.**	
2.	**Deficiency.** Throughout the closure plan there are references to using only a mobile laboratory for sampling and analysis. It is not stated that this is an EPA accredited laboratory or if any secondary or follow-up analysis will be conducted at an accredited laboratory.	

No.	Comments/Response	Concurrence

The mobile laboratory is good for initial site characterization to determine where contamination is located, but it can not meet SW-846 requirements.

There is no discussion of the impact on the closure schedule if the mobile laboratory is not be acceptable or available for the closure.

Requirement. Correct the deficiencies of the text.

RL/WHC Response: Accepted. Revised text will propose to perform initial (investigative) sampling with analytical support to be provided by the on-site Environmental Analytical Laboratory (EAL), previously referred to as the "mobile laboratory". The EAL will be providing analytical Level II support, as opposed to level III capabilities that were planned for the laboratory at the time Revision 0 of the closure plan was prepared. Tables 7-1, 7-2, 7A-1 and 7A-2 identify analytes of interest for initial sampling.

A separate round of confirmatory sampling will be proposed in Revision 1 of the plan. Confirmatory samples will be analyzed by an off-site, Ecology-approved analytical Level III laboratory. Subsequent to initial sampling and analysis and discussion of the results with Ecology, separate data quality objectives and analyte tables for confirmatory sampling will be prepared and documented as addenda to the closure plan.

Likewise, if soil removal is undertaken and verification sampling is to be carried out in support of soil removal, samples would be analyzed by an off-site analytical Level III laboratory. Separate data quality objectives and analyte tables would be developed for incorporation as addenda to the plan in that event.

No.	Comments/Response	Concurrence

If the EAL is not available to support sampling at the 200-W Ash Pit site, then sample analysis would have to be performed by an off-site contractor laboratory. The following schedule forecast would apply in the event:

- Sampling: 1 week (no change)
- Off-site analysis: 12 weeks (9 weeks longer than shown for EAL)
- Data Evaluation: 12 weeks (no change)

Off-site analysis would add 9 weeks to the initial (investigation) phase of soil sampling. Because the EAL is now offering Analytical Level II services, rather than Level III, an additional round of confirmatory sampling will be required. The breakdown for off-site analysis (listed above) will increase the schedule in Figure 7-2 by 25 weeks.

Ecology Response: Concur with part of revisions of the closure plan to reflect the information provided in the response. However, the increase of 25 weeks is not acceptable according to the Tri-Party Agreement (TPA). In TPA Section 9.6.2, it is stated that non-rad waste analyses have a maximum turnaround time of 50 days. Also in TPA Section 9.6, the maximum validation and transfer times are 21 and 15 days, respectively. Thus, the maximum per Sample Delivery Group (SDG) should be 86 days. Revise the text accordingly.

Due to suspect reporting and record keeping of wastes managed at a similar TSD (218-E-8 Borrow Pit), Appendix IX analysis of 40 CFR part 264 will be required at this unit.

Ecology/RL/WHC Resolution: The mobile laboratory will not be used for these clean closure activities. Throughout the closure plan references to using the mobile laboratory will be removed. Offsite laboratories

No.		Comments/Response	Concurrence

capable of EPA analytical level III will be used for all soil samples. All parties agree that Appendix IX analysis of 40 CFR part 264 will not be required at this unit, because all parties have accepted the list of discarded explosive chemical products in chapter 4 as accurate and complete.

3. **Comment.** The closure plan also cites many internal Westinghouse procedural manuals. It is not clear if these documents fulfill the EPA/Ecology requirement

RL/WHC Response: Copies of requested WHC Control Manuals cited in the closure plan were furnished to an Ecology, Kennewick Unit Manager representative.

Ecology Response: Concur. Copies of WHC's manuals referenced should be sent to the Department of Ecology's Kennewick office.

Ecology/RL/WHC Resolution: WHC's manuals must be assigned to a specific responsible person who is willing to be accountable for updating and maintaining control documents. Therefore no unassigned control reference manuals will be issued.

4. 1-1, 13 **Deficiency.** States that, "this event was a form of thermal treatment for spent or abandoned chemical waste." This is inconsistent with the waste description provided in Chapter 3, Process Information. Chapter 3.0 describes the waste as excess or beyond shelf life. If this is the case, then the materials are not spent waste. The contradiction must be corrected because it affects the waste designation.

Requirement. Specify the source or process which generated the waste and the form (product versus spent/used material) in which it was

No.		Comments/Response	Concurrence

disposed. Consult the Dangerous Waste Regulations, Washington Administrative Code (WAC) 173-303-070 for designation guidance.

RL/WHC Response: The chemicals detonated at the Ash Pit site were not spent or abandoned. The text will be revised to state "the chemicals were determined to be in excess or beyond designated stock life," to be consistent with the description in Chapter 3, pg 3-1.

Ecology Response: Concur with the revision of text to reflect the form in which the wastes were disposed.

Ecology/RL/WHC Resolution: Through the DQO process all parties agreed that the text would be revised to state " This demolition event was a form of thermal treatment for discarded explosive chemical products."

5. 1-1, 20 **Deficiency.** The plan does not present adequate information to determine if the waste has been properly designated. Information regarding the source of the waste (i.e., process derived from) and a distinction between wastes disposed in commercial form and those which were spent material is necessary to make such a determination.

Requirement. See previous comment (4).

RL/WHC Response: See comment 4. Waste characterization per WAC 173-303 is summarized in Table T4-1. The waste codes in Table T4-1 also indicate that the chemicals were not spent.

Ecology Response: The waste codes in Table T4-1 do indicate that the material was not spent, but the table fails to provide enough information to adequately designate the waste. The sources of information provided are inappropriate for the purposes of waste designation.

No.		Comments/Response	Concurrence

Ecology/RL/WHC Resolution: Table T4-1 doesn't attempt to explain waste designation or to provide data to allow waste designation. Waste designation Codes are based on WAC 173-303 and are formally available in the Part A, form 3. Table T4-1 will be revised removing all waste codes and adding health-based limits.

6. 2-2, 1 **Deficiency.** The description of the demolition site does not provide adequate detail to allow potential exposure pathways to be evaluated.

Requirement. Provide description of depth to water table, soil characteristics, meteorological information, and waste containment, if any, used during the detonation. Because the events do not appear to have been contained, these conditions may have significantly influenced the dispersion of contaminants. Therefore, incorporate these factors into the development of an appropriate sampling and analysis plan.

RL/WHC Response: Meteorological Information: Chemical detonations at this site were performed under the following weather conditions:

Detonation Date: November, 1984

- Wind speeds: less than 15 m.p.h.;
- Temperature: @45° F;
- No rain or snow;
- No chance of electrical storms.

Detonation Date: June 25, 1986

- Wind speed: @10 m.p.h.;
- Temperature: @95° F;
- Clear skies, no rain;
- No chance of electrical storms.

No.		Comments/Response	Concurrence

The surface soils were dry when the detonations were performed at this site. All chemicals detonated were contained in their original, closed containers until released by explosive forces.

Depth from soil surface to groundwater is 250-260 feet.

The text will be revised to reflect the proceeding information.

Ecology Response: Concur with the addition to the text of the information provided in the response, but the source of information must be provided.

Ecology/RL/WHC Resolution: Information has been incorporated into the text and is located in Chapters 3 and 5. Source of information are WHC documents, referenced in the revised text.

7. 2-2, 10 **Deficiency.** The text states that portions of the ash pit were used for other activities. It is not evident from the discussion if these activities impacted the ash pit or not.

Requirement. Specify if activities not associated with the demolition events were conducted in or adjacent to the demolition site.

RL/WHC Response: The text states that the Ash Pit Demolition site is only 20' by 20' area and is situated within a huge borrow pit (with the dimension of 600 feet by 800 feet). Both the burning and soil removal activities occurred away from the detonation site. There were only two known demolition activities at the demolition pit. Please see page 2-2, line 14-15.

Ecology Response: Concur with the addition to the text.

No.		Comments/Response	Concurrence

Ecology/RL/WHC Resolution: Text has been modified to further clarify separate activities that occurred in the borrow pit.

8. 2-2, 22 **Deficiency.** It is not clear how the boundary of the demolition site was determined.

Requirement. Provide rationale for boundary determination. The boundary of the site may have to be revised if contamination from the unit is detected outside the designated area.

RL/WHC Response: Please see page 2-2, line 20. At the time the fence was placed at the demolition site, there was still a depression in the soil from the blasting pit. If contamination from the unit is detected outside the designated area, the boundaries will be adjusted accordingly.

Ecology Response: Concur with the adjustment of unit boundary based on sampling and analysis data. The sampling and analysis of areas outside the present arbitrary boundary must be included in the closure plan.

Ecology/RL/WHC Resolution: Through the DQO process sampling locations and analytical methods were agreed upon. Agreements are documented in the Sampling and Analysis Plan, located in Appendix 7C in the closure plan.

9. 2-2, 27 **Note.** This section of the closure plan, Security Information, may require revision due to the recent and upcoming security downgrades on the Hanford Site.

RL/WHC Response: Accepted. Text will be revised to reflect any new security changes to the Hanford Site.

No.		Comments/Response	Concurrence

Ecology Response: Concur.

10. 3-1, 1

Deficiency. A major deficiency of the plan was information on the actual demolition event. The process information chapter does not provide a description of the event or associated actions. For example, was any post-treatment analysis conducted to verify treatment, or physical interaction with the site such as racking, shoveling, or watering down? Was waste containerized or free in pit during detonation? How were waste containers managed during and after the event? What color, how high, how wide was the explosion? Was material seen or heard hitting the ground?

Requirement. Provide a detailed narrative of the event and associated actions. The following questions need to be addressed:

a. Was the waste poured directly on the ground, allowing wastes to be forced into the ground by the explosion?
b. How were the waste containers managed during and after the event?
c. What were the environmental conditions at the time?
d. How, or was, waste inventory verified?

RL/WHC Response:
a. No container contents were poured onto the ground prior to detonation. The chemicals were detonated in their containers because opening the cap of the container could have initiated an explosion.

b. Prior to detonation, the containers were placed in a small pit, wrapped in detonating cord (on a separated blasting cap), surrounded with a blasting agent. The charges were configured in a manner that channeled the explosive force downward.

No.	Comments/Response	Concurrence

There was no evidence of remaining explosives, chemicals, or containers after the detonations, with the exception of the sides of one metal container from the 1986 detonation. The partial container was completely empty and burned. The remains of the container was disposed of in a sanitary landfill.

c. Refer to RL/WHC response to NOD #6.

d. A checklist of the chemical inventory was prepared prior to beginning detonation activities. The potentially explosive chemicals were checked off the list as they were placed into a portable bomb containment vessel for transportation to the demolition site. Information from the checklist was used to prepare the Dangerous Waste Annual Report.

The text will be revised accordingly in order to reflect the proceeding information.

Ecology Response:

a. Concur with addition of this information in text.

b. Concur with addition of this information in text. Elaborate on the impact to waste deposition.

Note. Disposal of the remnants of a waste container in a sanitary landfill was inappropriate, due to the fact that without analysis, it was not possible to determine if the container contained a listed waste or not. If it did, the container would have been considered a listed waste.

c. Refer to comment on NOD No. 6.

No.		Comments/Response	Concurrence

d. Quality control or verification documentation for the chemical inventory detonated at the unit does not appear to exist. Soil sampling and analysis will require enhancement to assure potential contamination is not missed. Modify text to incorporate Appendix IX of 40 CFR part 264.

Ecology/RL/WHC Resolution: (d) The inventory has been corrected and approved by all parties. Text has been revised to reflect accepted inventory. All parties agree that Appendix IX analysis of 40 CFR part 264 will not be required at this unit.

11. 3-1, 8 **Deficiency.** This section of the plan describes the wastes as "excess or beyond designated stock life." Page 1-1, line 11 states that "this event was a form of thermal treatment for spent or abandoned chemical waste."

Requirement. Specify the source or process which generated the waste and the form (product versus spent/used material) in which it was disposed. Consult the Dangerous Waste Regulations, Washington Administrative Code (WAC) 173-303-070 for designation guidance.

RL/WHC Response: See comment #4.

Ecology Response: Concur with the revision of text to reflect the form in which the wastes were disposed.

Ecology/RL/WHC Resolution: Through the DQO process all parties agreed that the text would be revised to state " This demolition event was a form of thermal treatment for discarded explosive chemical products."

12. 3-1, 25 **Deficiency.** The text states that chemicals were placed at the bottom of the pit with detonation devices placed around and on top of the

No.	Comments/Response	Concurrence

chemicals. There is no discussion of how, or if, the waste was containerized.

Requirement. Provide a detailed description of the number, composition, volume, and management practices of the containers associated with the wastes detonated at the site. Were the containers, or pieces of containers, removed from the site? If so, how were they managed? State exactly how the wastes were placed in the pit (i.e., poured out of containers).

Note. Placement of the detonation devices on top of the waste is of concern because it may have forced the waste into the soil due to the force of the explosion.

RL/WHC Response: See comment response #10. In response to the note, the shape of the charge was configured in a manner which initially directed the explosive force downward, but due to the confines of the earthen pit, the force reversed to an upward direction (the path of least resistance). Confining the heat and pressure of the explosive force around the chemicals increased the efficiency of destruction.

Ecology Response: See NOD No. 10 response.

Ecology/RL/WHC Resolution: Detailed descriptions of the detonation event and the placement of waste were located in Chapter 3. In Chapter 3, lines 36-40, the text has been revised to read " There was no evidence of remaining explosives, chemicals, or containers after the detonations, with the exception of the sides of one metal container from the 1986 detonation. The partial container was found empty and burned. The remains of the container were disposed in a sanitary landfill." Table 4-1 list the amounts and number of discarded explosive chemical products.

No.		Comments/Response	Concurrence
13.	3-1, 27	**Deficiency.** Detonation materials are not included in the scope of sampling and analysis. These materials are now dangerous waste, because they were both derived from the treatment of dangerous waste and now are potentially mixed with dangerous wastes. **Requirement.** The explosives used to initiate the detonation (and any regulated products potentially generated from the detonation) must be incorporated into the sampling and analysis plan. RL/WHC Response: The chemicals used to initiate the detonation will be listed in a separate table in Chapter 4. The sampling plan will be modified to reflect the additional analytes. Ecology Response: Concur with the inclusion of detonation materials in list of analytes. Also include reaction and/or decomposition products as analytes. Additionally, due to suspect reporting and record keeping of wastes managed at a similar TSD (218-E-8 Borrow Pit), Appendix IX analysis of 40 CFR part 264 will be required at this unit. **Ecology/RL/WHC Resolution: Through the DQO process sampling locations and analytical methods were agreed upon. Agreements are documented in the Sampling and Analysis Plan, located in Appendix 7C in the closure plan. All parties agree that Appendix IX analysis of 40 CFR part 264 will not be required at this unit, because all parties have accepted the list of discarded explosive chemical products in chapter 4 as accurate and complete.**	
14.	3-1, 29	**Comment.** The text states that inspections were conducted following the detonation event.	

No.		Comments/Response	Concurrence

Requirement. Provide detailed description of the focus of inspection, environmental conditions, size, and intensity of the explosion, and any "unofficial" inspection reports or records.

RL/WHC Response: After each detonation, the site was inspected to ensure that no explosives, chemicals, or containers remained after the shot. After the 1986 detonation, the soils in and surrounding the pit were surveyed with a organic photoionizer (with an 11.2 ev probe) to determine if there were any residual volatile organics. There were no reading above background.

Because the 1984 detonation was at night, the area was searched with spotlights and flashlights after the detonation. The area was reinspected the following morning after daylight. No containers were found.

The size of the detonations were not recorded and therefore the description would be nebulous.

Ecology Response: Insert information provided in response into closure plan.

Ecology/RL/WHC Resolution: Information has been incorporated into the text and is located in Chapter 3.

15. 4-1 **Deficiency.** This chapter provides some valuable information, but overall it is inadequate.

Suggestion. Incorporate a column specifying the waste source (i.e., spent or in commercial form), the physical state, and action levels.

No.		Comments/Response	Concurrence
		RL/WHC Response: Health-based cleanup thresholds will be provided in the next revision of this closure plan, for those constitutes for which appropriate toxicity information is available. Ecology Response: The response does not address the deficiencies noted. Because sections -700 to -760 of MTCA is expected to be incorporated into the Dangerous Waste Regulations before implementation of the closure plan, it is appropriate to incorporate MTCA standards (see draft clean closure guidance). But the information regarding the waste source and physical state will be required to be incorporated into the closure plan. **Ecology/RL/WHC Resolution: Through the DQO process all parties agreed that to meet criteria for clean closure of the Ash Pit Demolition Site, the soil sampling and analytical results must verify that the levels of discarded explosive chemical products derived from the Ash Pit Demolition Site operations are below action levels. Agreed action levels are defined as levels above the Hanford Site soil background levels identified in *Hanford Site Background: Part 1, Soil Background for Nonradioactive Analytes* and Model Toxic Control Act (MTCA) Method B levels. Since Hanford Site soil background levels and MTCA Method B levels are the closure criteria agreed upon by all parties it reasonable that those levels would be provided in Table 4. The physical form of the discarded explosive chemical products and initiator will be indicated in Table 4-1.**	
16.	T4-1	**Deficiency.** Several blanks exist on the second and third page of the table. This is inappropriate. The missing components of the table and the statement that "the known inventory of chemicals that were detonated is listed in Table 4-1" (4-1, 12) raises concerns regarding the accuracy of the information presented.	

No.		Comments/Response	Concurrence
		Requirement. Provide the missing information. RL/WHC Response: The blank spaces indicate that the chemicals are part of a mixture and the total amount of those mixtures are shown at the beginning of each mixture listing. The table will be revised to clearly indicate chemical mixtures. **Ecology Response: Concur.**	
17.	T4-1	**Deficiency.** It is not apparent how the dangerous waste codes presented in Table T4-1 were determined, or if they are correct. The sources of information are not appropriate for the purpose of designating waste. **Requirement.** Correct deficiencies and discrepancies of text. RL/WHC Response: The chemicals were treated in their original containers and assumed to be either outdated or not needed. These chemicals were designated according to WAC 173-303. Any assumptions concerning waste sources were conservative (i.e., in instances where the applicability of a code was uncertain, it was assumed to be applicable). Waste characteristics were derived from known physical properties and toxicity information available for the waste constituents. Ecology Response: Concur with response. Revise the closure plan to reflect the information provided in the response. **Ecology/RL/WHC Resolution: Information on the discarded explosive chemical products has been incorporated into the text and is located in Chapters 3 and 4.**	
18.	T4-1	**Deficiency.** The detonation material is potentially regulated dangerous waste. However, the material and its products are not designated.	

No.		Comments/Response	Concurrence

Requirement. Correct deficiencies and discrepancies of text. Designate the material.

RL/WHC Response: See comment response #13.

Ecology Response: Concur.

19. T4-1 **Deficiency.** An asterisk is present on the "D" symbol in the key list following Table 4-1, typically indicating a reference to a clarifying statement, but no footnote or explanation is provided.

Requirement. Correct deficiencies and discrepancies of text.

RL/WHC Response: Asterisk will be removed from Table 4-1.

Ecology Response: Concur.

20. 5-1 **Deficiency.** The text states that the Tri-Party Agreement (TPA) authorizes ground water to be remediated under CERCLA without intermittent RCRA monitoring. This is not correct. RCRA monitoring is required, but it may be coordinated with CERCLA monitoring.

Requirement. Modify the text accordingly.

RL/WHC Response: The text will be revised as follows: "The Ash Pit Demolition site is not subject to the groundwater monitoring requirements of WAC 173-303-610 (7)(a) if there is not waste left in place, as is consistent with the preferred closure strategy (Chapter 6.0) The Ash Pit Demolition site will not be operated, and has not been operated as a dangerous waste surface impoundment, waste pile, land treatment unit, or landfill as defined in WAC 173-303-645(1)(a).

No.		Comments/Response	Concurrence

Therefore, if clean or protective closure can be attained, groundwater monitoring is not required."

Ecology Response:

a. Give the definition of "Protective Closure."

b. 200 W. APDS is regulated as a miscellaneous unit under WAC 173-303-680(4). The regulation requires that the unit must meet the postclosure care requirements of WAC 173-303-680(2), if the contaminated soils or ground water cannot be completely removed or decontaminated during closure.

Ecology/RL/WHC Resolution: Text referring to Protective Closure has been removed. Clean closure is the objective of this closure plan. The criteria for clean closure is if sample analysis results indicate that the constitutes of concern are at or below action levels as defined in the closure plan. Postclosure monitoring is not required if clean closure is attained.

21. 6-1, 17 **Requirement.** Action levels must be approved by Ecology.

Suggestion. A table should be generated which integrates this information in Table 4-1.

RL/WHC Response: Action levels will be prepared for inclusion in the next revision of this closure plan. Proposed action levels will be health based cleanup thresholds.

Ecology Response: Although the term "action levels" is defined within the closure plan as "concentrations of analytes of interest that prompt an action . . . ," the term is not defined by WAC 173-303. As the

No.		Comments/Response	Concurrence

closure plan addresses a RCRA unit, and to avoid confusion on this subject, delete the term "action level." It should be noted that a definition for "cleanup level" is provided by WAC 173-340-200 which may be utilized by reference of proposed WAC 173-303-610 (scheduled to promulgated in Dec. 1993 to amend WAC 173-303-610 to include WAC 173-340-700 through 760 except 745).

Ecology/RL/WHC Resolution: Through the DQO process, action levels were defined and agreed to by all parties, as levels above the Hanford Site soil background levels identified in *Hanford Site Background: Part 1, Soil Background for Nonradioactive Analytes (DOE-RL 1993)* and Model Toxic Control Act (MTCA) (WAC 173-340) Method B levels.

22. 6-1, 19 **Deficiency.** Table 7-1, referenced here, is said to take into account waste inventory, reaction products, and chemical degradation. The following sentence states that only analytes listed in Table 7-1 are traceable to the demolition site. Table 7-1 does not account for all wastes detonated at the site or potentially regulated reaction or degradation products.

Requirement. The closure plan must account for all dangerous wastes associated with the detonation site. This includes dangerous wastes generated from the treatment of the original wastes and materials used to treat the waste (i.e., the detonation materials).

RL/WHC Response: Text on Page 6-1, Lines 19-23 will be modified to read as follows: "The basis for determining chemical ownership is the list of analytes of interest found in Chapter 7.0, Table 7-1, as qualified by the discussion in Section 7.2.2. Only those analytes identified in Section 7.2.2 and/or Table 7-1 are traceable to the Ash Pit Demolition Site activities."

No.		Comments/Response	Concurrence
		Table 7-1, as qualified by the discussion in Section 7.2.2, accounts for all dangerous wastes associated with the detonation site. Regarding the detonation materials, refer to NOD # 18 comment response. Ecology Response: Refer analytes traceable to the Ash Pit Demolition Site activity to NOD No. 2 response. Refer waste generated from the detonation event and the detonation materials to NOD No. 13 response. **Ecology/RL/WHC Resolution: Through the DQO process constituents of concerns and analytical methods were identified and agreed to by all parties. See the Sampling and Analysis Plan (SAP) for specific agreements.**	
23.	6-1, 23	**Note.** The plan states, "if at any time an imminent hazard is posed at the Ash Pit Demolition Site, an expedited response will result to ensure worker safety." **Requirement.** Closure of the site must be conducted in a manner consistent with the closure plan. Deviation from the closure plan must be approved by Ecology. **RL/WHC Response: The word "expedited" will be replaced with the word "emergency" in order to clarify the sentence.** **Ecology Response: Concur with the correction.**	
24.	6-1, 31	**Deficiency.** The plan states that background will be site-wide background threshold values as defined in the Hanford Site Soil Background (DOE/RL 1992a).	

No.		Comments/Response	Concurrence

Requirement. Ecology must review and approve the Hanford Site Soil Background study (DOE/RL 1992a) before the values can be implemented for closure.

RL/WHC Response: Ecology has reviewed and approved the Hanford Site Soil Background Study (DOE/RL 1992a).

Ecology Response: Ecology did receive The Hanford Site Soil Background (DOE/RL 1992d). However, the document was considered incomplete. There is still a huge task ahead in order to finish the site-wide background analysis (see detail in the memo from Charles Cline, WA State Department of Ecology, to Steven Wisness, US DOE, dated May 10, 1993).

Requirement: Ecology must review and approve the *Hanford Site Soil Background* for RCRA closures before the values can be implemented for closure..

Ecology/RL/WHC Resolution: Through the DQO process all parties have agreed to use Hanford Site Soil Background levels as one of the criteria for action levels. Also the Hanford Soil Background is listed as a closure performance standard in the Site-Wide Permit, Section II.K.2.

25. 6-1, 34 **Deficiency.** The plan states that if concentrations exceed initial action levels, health-based action levels will be assessed. This is not consistent with clean closure standards. It is expected that during the next revision of the Dangerous Waste Regulations, WAC 173-303, that the Model Toxics Control Act (MTCA) will be incorporated into the closure requirements. To date no guidance or policy has been issued allowing this approach to be implemented.

Requirement. If the concentration of waste are below (or reduced to) background levels for listed or characteristic wastes or to the

No.		Comments/Response	Concurrence

designation limit for state-only waste managed at the site clean closure will be achieved. If the site is closed with waste left in place post-closure requirements will be imposed.

RL/WHC Response: In anticipating the incorporation of cleanup levels rather than environmental background levels, into the Washington State Department Waste regulations, RL contends it is appropriate to use health-based action levels.

Ecology Response: Refer the action level to NOD No. 21 response.

Ecology/RL/WHC Resolution: Through the DQO process all parties agreed that to meet criteria for clean closure of the Ash Pit Demolition Site, the soil sampling and analytical results must verify that the levels of discarded explosive chemical products derived from the Ash Pit Demolition Site operations are below action levels. Agreed action levels are defined as levels above the Hanford Site soil background levels identified in *Hanford Site Background: Part 1, Soil Background for Nonradioactive Analytes* and Model Toxic Control Act (MTCA) Method B levels.

26. 6-1, 37 **Deficiency.** This paragraph discusses the proposed method to determine cleanup levels. It is said that the health-based levels will be based on equations and exposure assumptions presented in the Hanford Site Baseline Risk Assessment Methodology (DOE/RL 1992B). This is not appropriate.

Requirement. Health-based levels are determined from the Model Toxic Control Act (MTCA). See two previous comments.

RL/WHC Response: RL has attempted to establish a uniform health-based cleanup standard for a range of land-use eventualities (Hanford Site

No.	Comments/Response	Concurrence

Baseline Risk Assessment Methodology [HSBRAM]; referenced in the closure plan). Preparation of this standard is sanctioned by the Tri-Party Agreement process (Milestone number M-29-03). It is intended to provide a risk assessment methodology that is consistent with current regulations and guidance. The method was developed specifically to evaluated risk for CERCLA remedial investigations and RCRA facility investigations. The health-based method of HSBRAM is similar to, and consistent with the Model Toxics Control Act (MTCA [WAC 173-340]). HSBRAM has been accepted by the EPA and Ecology generally at the Hanford Site, and is consistent with the consensus of TPA project manager meetings and Ecology's standards will replace background in WAC 173-303. HSBRAM is proposed in the Ash Pit Demolition closure plan.

Ecology Response: HSBRAM has not yet been approved by Ecology. Instead only some of the risk assessment requirements of the MTCA Cleanup Regulation were incorporated in HSBRAM by DOE (see detail in the Memo from DOE to George Hofer, US EPA, and Roger Stanley, WA Department of Ecology, dated May 5, 1993). Therefore, the health-based levels should substituted, where appropriate, with Model Toxics Control Act (MTCA) cleanup levels, if applicable.

Ecology/RL/WHC Resolution: Through the DQO process all parties agreed that to meet criteria for clean closure of the Ash Pit Demolition Site, the soil sampling and analytical results must verify that the levels of discarded explosive chemical products derived from the Ash Pit Demolition Site operations are below action levels. Agreed action levels are defined as levels above the Hanford Site soil background levels identified in *Hanford Site Background: Part 1, Soil Background for Nonradioactive Analytes* and Model Toxic Control Act (MTCA) Method B levels.

No.		Comments/Response	Concurrence
27.	6-1, 47	**Deficiency.** The plan states that health-based levels will be based on values that are current at the time of approval of this closure plan. **Requirement.** Ecology must approve all health-based levels implemented for closure. RL/WHC Response: Please see page 6-1, line 44-47. The term "values" in this sentence is referring to the oral reference dose and slope factors obtained for the Integrated Risk Information System (IRIS) (EPA 1991) database, these values may change as IRIS is updated. **Ecology Response: Concur.**	
28.	6-1, 50	**Deficiency.** This paragraph discusses remedial activities and coordination with CERCLA remediation if it is determined that the action levels are exceeded. **Requirement.** CERCLA coordination is acceptable if the time frame and other factors can be integrated with the RCRA closure. But closure of the unit will not be deferred to, or preempted by, the CERCLA remediation. If clean closure is not achieved, post-closure requirements will be imposed, including requirements to assure residual contamination will be addressed during CERCLA remediation. RL/WHC Response: Coordination is planned if clean closure is not achieved. RL would keep Ecology informed on this integration process whenever it occurred. Please clarify the statement that closure cannot be deferred until CERCLA remediation. Ecology Response: Refer the action level to NOD No. 21 response. If clean closure can not be achieved, postclosure requirement will be required regardless if CERCLA remediation is available or not at that	

No.		Comments/Response	Concurrence

time. If the coordination between RCRA and CERCLA is planned for postclosure care, give explicitly the planned time schedule in the next revision.

Ecology/RL/WHC Resolution: Through the DQO process all parties have agreed to develop a phase two investigation if the soil analysis results were determine to be above action levels. Text referring to the contrary has been removed.

29. 6-2, 10 **Requirement.** Simply cite the regulations or incorporate the entire section.

RL/WHC Response: Reference has been changed to WAC 173-303-610 (2)(a).

Ecology Response: Concur with the correction.

30. 6-2, 36 **Deficiency.** The plan states that the following actions will be/or have been taken. It is not clear which actions were conducted prior to preparation and approval of the closure plan.

Requirement. Actions conducted prior to submittal of the closure plan must be distinguished in order to evaluate the adequacy.

RL/WHC Response: Any action that has been already completed will be noted in the text.

Ecology Response: Concur with the correction.

Ecology/RL/WHC Resolution: Text has been revised to note completion dates of past activities.

No.		Comments/Response	Concurrence
31.	6-2, 43	**Deficiency.** This bullet states that the Hanford Site Baseline Risk Assessment Methodology implements WAC 173-304 (MTCA). **Requirement.** See comment 24. RL/WHC Response: See comment responses # 24 and # 26. Ecology Response: See NOD Nos. 24 and 26 responses. **Ecology/RL/WHC Resolution: Reference to Hanford Site Baseline Risk Assessment Methodology has been removed from text.**	
32.	6-3, 20	**Deficiency.** The plan states that the samples will be analyzed in an on-site mobile laboratory capable of performing to EPA Analytical level III standards. **Requirement.** See comment 2. RL/WHC Response: See comment response #2. Ecology Response: See NOD No. 2 response. **Ecology/RL/WHC Resolution: Throughout the closure plan references to using the mobile laboratory will be removed. Offsite laboratories capable of EPA analytical level III will be used for all soil samples.**	
33.	6-3, 29	**Deficiency.** Table 7-1, referenced here, provides a list of target analytes that is inadequate because it does not address by-product and degradation products. **Requirement.** Modify text accordingly. See comment 22.	

No.		Comments/Response	Concurrence

RL/WHC Response: See comment response #22.

Ecology Response: See NOD No. 22 response.

Ecology/RL/WHC Resolution: Through the DQO process constituents of concerns and analytical methods were identified and agreed to by all parties. See the Sampling and Analysis Plan (SAP) for specific agreements.

34. 6-3, 34 **Deficiency.** This section of the plan addressed contamination at the demolition site above the action levels only in the near-surface soils. It is not appropriate to address only near-surface contamination.

Requirement. Removal of deeper residual contamination may be coordinated with CERCLA remediation but investigation and planning can not be deferred. If such an approach were implemented a plan would have to be developed to assure that RCRA closure standards would be meet by the final remediation.

Note. Action levels described here are not consistent with other areas of the text. Health-based levels should not be used to define action levels at this point.

RL/WHC Response: See comment response #48.

Ecology Response: Refer the action level to NOD No. 21 response. See also NOD Nos. 47 and 48 responses.

Ecology/RL/WHC Resolution: Reference to "near-surface" contamination has been removed from text. If levels of constituents of concern are above action levels then a phase two investigation will be developed by all parties concerned.

No.		Comments/Response	Concurrence
35.	7-1, 28	**Deficiency.** The plan specifies that samples will be analyzed by an on-site mobile laboratory capable of performing to EPA analytical level III standards. **Requirement.** Explain analytical level III services as it applies to this closure. Specify if the mobile laboratory meets level III requirements. See comment 2. RL/WHC Response: See comment response #2. Ecology Response: See NOD No. 2 response. **Ecology/RL/WHC Resolution: Throughout the closure plan references to using the mobile laboratory will be removed. Offsite laboratories capable of EPA analytical level III will be used for all soil samples.**	
36.	7-1, 32	**Deficiency.** The text states that portable field-screening instruments will provide adequate information for devising and implementing appropriate remedial actions. **Requirement.** Specify if more elaborate sampling and analysis will be conducted if constituents are found at significant concentrations. RL/WHC Response: Text is misquoted. Text reads "... the data obtained from soil sampling and analysis (possibly supplemented by data obtained with portable field screening instrumentation) will provide adequate information for devising and implementing appropriate remedial action." Confirmatory sampling (i.e., more elaborate sampling) is proposed to support a regulatory determination of clean closure. There is no technical need or justification for conducting "more elaborate sampling and analysis" to support a remedial action.	

No.		Comments/Response	Concurrence

Ecology Response: The purpose of the plan is to close the demolition site rather than remediate it. In order to clean close the unit, the contaminated soil or ground water should either be removed or decontaminated, otherwise the postclosure care is required. The soil sampling and analysis should emphasize this.

Ecology/RL/WHC Resolution: Through the DQO process all parties have agreed to develop a phase two investigation if the soil analysis results were determine to be above action levels. Text referring to the contrary has been removed.

37. 7-2, 27 **Deficiency.** This paragraph discusses the possibility for the generation of by-products from the detonation event.

Requirement. Incorporate regulated products into the analyte list.

RL/WHC Response: See comment response #22.

Ecology Response: See NOD No. 23 response.

Ecology/RL/WHC Resolution: Through the DQO process all sampling and analytical concerns were resolved. Constituents of concerns and analytical methods were identified and agreed to by all parties. See the Sampling and Analysis Plan (SAP) for specific agreements. Table 4-2 list detonation materials.

38. 7-2, 34 **Deficiency.** This paragraph discusses the potential dispersion of waste from the detonation event. This factor will influence the determination of the boundary.

Requirement. Modify text to reflect this consideration.

No.		Comments/Response	Concurrence

RL/WHC Response: See comment response #48.

Ecology Response: See NOD Nos. 47 and 48 responses.

Ecology/RL/WHC Resolution: Through the DQO process all sampling and analytical concerns were resolved, which include sampling locations and boundaries. Constituents of concerns and analytical methods were identified and agreed to by all parties. See the Sampling and Analysis Plan (SAP) for specific agreements.

39. 7-2, 47 **Deficiency.** This section refers to the waste inventory list. The waste inventory list in inadequate.

Requirement. It must account for all dangerous wastes detonated or generated from the detonation at the site.

RL/WHC Response: See comment response #18.
Ecology Response: See NOD No. 13 response.

Ecology/RL/WHC Resolution: The inventory has been approved by all parties. Text has been revised to reflect accepted inventory

40. 7-3, 5 **Requirement.** See comments 38 and 39.

RL/WHC Response: See comment responses #22 and #48.

Ecology Response: See NOD Nos. 13 and 47 responses.

Ecology/RL/WHC Resolution: Through the DQO process all sampling and analytical concerns were resolved. Constituents of concerns and analytical methods were identified and agreed to by all parties. See the Sampling and Analysis Plan (SAP) for specific agreements.

No.		Comments/Response	Concurrence
41.	7-3, 11	**Note.** It is stated that the concentrations of any dangerous waste constituents that may remain in the soil after closure would probably exist at very low concentrations. **Requirement.** Specify whether the mobile laboratory will, or will not, be able to detect such concentrations. RL/WHC Response: Taken out of context; terms such as "low" or "very low" do not have quantitative significance. The intent of the cited statement in context, as indicated in the sentence that follows in the text, is to justify a conservative approach to initial sampling and analysis (as opposed to, for example, doing level I field screening initially). Method detection limits are identified on Pages 7-8 and 7-9. Ecology Response: a. If initial samples at level II (EAL) indicate a "no action," confirmatory level III analyses will have to be done to verify this alternative. b. For every fifth sample, a split has to be taken and sent off for level III analyses. This will help in determining validity of level II analyses as well as give some ICP/AA metals analyses. **Ecology/RL/WHC Resolution: Throughout the closure plan references to using the mobile laboratory will be removed. Offsite laboratories capable of EPA analytical level III will be used for all soil samples. Also through the DQO process all sampling and analytical concerns were resolved. Constituents of concerns and analytical methods were identified and agreed to by all parties. See the Sampling and Analysis Plan (SAP) for specific agreements.**	

No.		Comments/Response	Concurrence
42.	7-3, 15	**Requirement.** See comment 38 and 39. RL/WHC Response: See comment responses #22 and #48. Ecology Response: See NOD Nos. 13 and 47 responses. **Ecology/RL/WHC Resolution: Through the DQO process all sampling and analytical concerns were resolved. Constituents of concerns and analytical methods were identified and agreed to by all parties. See the Sampling and Analysis Plan (SAP) for specific agreements.**	
43.	7-3, 18	**Deficiency.** Portable field screening instruments are considered level I, not level I or II. **Requirement.** Modify the text to reflect this consideration. RL/WHC Response: Accepted. See comment response #2. Ecology Response: Concur with the correction. **Ecology/RL/WHC Resolution: Offsite laboratories capable of EPA analytical level III will be used for all soil samples. Reference to the use of portable field screening instruments will be removed.**	
44.	7-3, 43	**Deficiency.** It is not clear why Methyl Ethyl Ketone was the only compound selected from the Toxic Characteristics List. **Requirement.** Provide a thorough discussion of this determination. RL/WHC Response: Text should read "... two target compound list (TCL) compounds: benzene and toluene." Benzene and toluene are the only TCL compounds among the analytes of interest listed in Table 7-1. MEK was	

No.		Comments/Response	Concurrence

inserted in the text in place of benzene and toluene as the consequence of an editing error.

Ecology Response: Revise text accordingly to correct errors.

Ecology/RL/WHC Resolution: Through the DQO process all sampling and analytical concerns were resolved. Constituents of concerns and analytical methods were identified and agreed to by all parties. See the Sampling and Analysis Plan (SAP) for specific agreements.

45. 7-4, 1 **Deficiency.** There is concern for on-site calibration of instruments. Is it conceivable that the instruments may be less sensitive because of local contamination?

Requirement. Provide a discussion to demonstrate that this concern has or will be addressed.

RL/WHC Response: The citation discusses preparation or acquisition of solutions that would be used as calibration standards (i.e., for equipment such as gas chromatograph, and GC/MS devices). These types of devices are virtually always calibrated on site, because most of them are fixed equipment. Calibration will be managed and controlled per EAL technical and operating procedures. All proposed EAL analytical procedures, will be submitted to Ecology for review and approval in advance of sampling. These types of devices are virtually always calibrated in place, insofar as they generally are fixed equipment.

Ecology Response: Concur.

Ecology/RL/WHC Resolution: Throughout the closure plan references to using the mobile onsite laboratory will be removed. Offsite

No.		Comments/Response	Concurrence
		laboratories capable of EPA analytical level III will be used for all soil samples.	
46.	7-4, 28	**Deficiency.** Table 7-1, cited here, is incomplete. Several metals are present in combined form as indicated by the list provided in chapter 4. Pure metals are not expected to be found at the site. **Requirement.** Incorporate sampling and analysis for all regulated compounds detonated or generated at the site. RL/WHC Response: Rationale for all modifications and/or deletions to the analytes of interest list are provided on page 7-4, line 38, continuing to page 7-5, line 37. Ecology Response: Concur with the explanations. However, it is required to do metals analysis using SW-846 method nos. 6010, 7421, 7471, 7740, and 7060 at investigative phase. If any metal is found, the same tests will have to be done at the confirmatory phase to prove clean closure. **Ecology/RL/WHC Resolution: Through the DQO process all sampling and analytical concerns were resolved. Constituents of concerns and analytical methods were identified and agreed to by all parties. See the Sampling and Analysis Plan (SAP) for specific agreements. Table 7-1 has been removed from the text.**	
47.	7-5, 45	**Requirement.** The sampling design must be evaluated by a statistician prior to conducting any work to determine if the sampling and analysis are adequate to determine the extent of contamination. In addition to random sampling, add a provision for bias sampling in areas of visual contamination, down wind, and deeper in pit areas.	

No.	Comments/Response	Concurrence

RL/WHC Response: Current commitments call for RL and WHC to sample and analyze the near-surface soils using the EAL for analytical support. The EAL (analytical Level II) generally provides method detection limit capabilities in the low PPM range, which should compare favorably with proposed action limits for the analytes of interest.

If the initial round of sampling should indicate that any of the analytes of interest in Table 7-1 are present at concentrations exceeding proposed action levels, then supplemental sampling will be undertaken. A new sampling arrangement would be developed for supplemental sampling, working outward from the "hot spot" locations identified previously. The supplemental sampling plan would be reviewed in advance with Ecology. Field screening methods may be applied for supplementary sampling. If RL and WHC should propose field screening methods (analytical Level I) supplemental sampling, demonstrations would be provided that the screening method(s) of choice offer adequate sensitivity to detect the analyte(s) of interest at concentrations that are statistically significantly lower then corresponding action level(s). If it is determined that field screening methods are not applicable, sampling and analysis would be carried out by the same methods proposed for initial sampling (i.e., analytical level II.

Supplemental sampling of the near-surface soils (i.e., the uppermost 2 ft interval) would be extended outward from "hot spots" until the extent of contaminated soil is completely defined, irrespective of the initial sampling arrangement. The volume of contaminated soil (i.e., soil with contaminant concentrations exceeding negotiated action levels) would be removed in 2-ft thick layer, as discussed in Section 7.3. Afterwards, the newly exposed ground surface would be resampled for verification purposes (analytical Level III). The verification sampling plan would be reviewed in advance with Ecology. If the newly exposed soil also is contaminated, the lateral extent of contamination would be

No.	Comments/Response	Concurrence

determined by sampling as above, and additional soil would be removed in 2-ft lifts as necessary. This process of sampling and soil removal would be repeated as often as necessary to achieve the objective of clean closure. A final round of confirmatory sampling (analytical Level III) is proposed to support a regulatory determination of clean closure. As in other cases, the confirmatory sampling plan would be reviewed in advance with Ecology.

RL and WHC believe that contamination at the demolition sites (if present) is shallow and of limited lateral extent. The proposed plan seeks to limit the amount of sampling and associated expense in the event that this view is correct. RL and WHC are aware that the approach involves some risk-taking and cost consequences in the event that contamination is extensive and a relatively elaborate cleanup effort is required. The closure plan includes contingencies (outlined above) for working outward and downward in the soil column if contamination is discovered. RL and WHC believe that plan offers sufficient contingencies to ensure that the plan will be responsive to Ecology's regulatory interests in any event regarding the specific nature and extent of contamination at the site.

Regarding statistical evaluation of the plan: The draft plan was reviewed by a qualified statistician.

Regarding areas of visual contamination: There are no visibly contaminated areas. As discussed in Section 3.0, the sites were inspected immediately after demolition events, and any visibly contaminated areas were cleaned up.

Regarding biased sampling in the down-wind direction: Work rules in place at the time prohibited conducting demolition activities when wind speeds exceeded 35 mph (i.e., it is generally know that none of the

No.	Comments/Response	Concurrence

demolition events occurred at the times when winds exceeded 35 mph). Participants at the demolition events believe that wind condition never actually exceeded 10-15 mph, although written records of weather conditions were not kept. RL and WHC believes that contingencies in the existing plan are sufficient to identify distortions in contaminant distribution due to wind dispersal without modifications to the proposed arrangement for initial sampling.

Regarding Ecology's expressed interest in extending sampling deeper in pit areas: It is unlikely that contaminants were driven into the ground by the demolition activities. It is far likelier that chemical reaction products and any unreacted residues were released into the air (the unconfined direction in terms of the forces and pressure involved). Because contamination (if any) would have been a surface condition initially, the existence of sub-surface contamination (if any) would have been brought about by factors such as solution and leaching. RL and WHC believes that contingencies in the existing plan are sufficient to identify residual sub-surface contamination. If the uppermost 2 ft of the soil column is shown not to contain contaminant concentrations at or near to action levels, then RL and WHC does not agree there is a legitimate concern that higher concentration of contaminates traceable to the subject activities could exist at greater depths. It is not a reasonable expectation that contaminants could somehow be driven 12 ft into the ground as the result of the activities described in the closure plan.

Extensive research has been conducted at the Hanford Site regarding moisture evapotranspiration of soil moisture and infiltration (recharge) through the vadose zone. It has generally been determined, with some exceptions for isolated locations where the near-surface soils are extremely coarse, that wetting fronts generally do not penetrate to depths exceeding about 4 feet. Sampling to a depth of 12 feet would

No.	Comments/Response	Concurrence

require working with either a hollow-stem auger rig or a backhoe. Either option represents a major departure (in terms of time and cost) from the proposed plan. To attempt to resolve this issue, RL and WHC would propose to sample to a depth of 4 feet at the open circled locations shown in Figures 7-1 in the plan. RL and WHC also would be willing to offer to resample at extended depths at any location where initial sampling results indicate that contaminants are present at or close to proposed action levels.

Ecology Response: Concur with EAL as analytical support to the investigative phase (level III). See additional requirements for EAL on NOD No. 41 response. Refer action limit to NOD No. 21 response.

The closure should proceed to achieve the performance standards of WAC 173-303-610(2) rather than restricted by any proposed plan. Adjusting sampling depth according to the initial sampling results is considered acceptable. However, initial biased sampling to 12 ft was required for at least 30% of the proposed sampling locations. It has to include the two sampling locations near the geometric center of the site. Otherwise, experimental and/or theoretical demonstrations must be furnished to show that the penetration depth of the waste explosives and byproducts from the detonation process and following precipitations is less than 12 ft under the specific geological conditions of the detonation sites.

Biased sampling in the down-wind direction will also be required unless experimental and/or theoretical demonstrations can be furnished to show that the migration distance of the waste explosives and the byproducts is negligible assuming that the wind speed is less than and/or equal to 35 mph.

No.		Comments/Response	Concurrence
		Ecology/RL/WHC Resolution: Through the DQO process all sampling and analytical concerns were resolved. Constituents of concerns and analytical methods were identified and agreed to by all parties. See the Sampling and Analysis Plan (SAP) for specific agreements.	
48.	7-6, 1	**Deficiency.** Due to the heterogenous nature of the waste detonated at the site, and the fact that materials may have been driven to considerable depths from the explosion, contaminants are not likely to be evenly distributed. One surface sample from the approximate center of the pit is not adequate. **Requirement.** Sampling will have to be conducted not only at the surface but also at substantial depth under the site. See previous comment. RL/WHC Response: See comment response #48. Ecology Response: The RL/WHC response to NOD number 48 is "see comment response #48." This is not an adequate response. See also NOD No. 47 response. **Ecology/RL/WHC Resolution: Through the DQO process all sampling and analytical concerns were resolved. Number of samples and sample locations were identified and agreed to by all parties. See the Sampling and Analysis Plan (SAP) for specific agreements.**	
49.	7-6, 11	**Deficiency.** It is stated that surface sampling will be conduced at two locations. This is inadequate. **Requirement.** At each sampling location, sampling and analysis for organics should be conducted at a minimum for both the top layer and the next underlying layer.	

No.		Comments/Response	Concurrence

RL/WHC Response: As indicated in Lines 36-39 of the same page, the purpose of the two surface samples is to evaluate the adequacy of the proposed arrangement. If residual contaminants are not identifiable in the two surface (0-6 in.) samples to be taken as identified on line 11, then RL and WHC do not propose to sample and analyze this interval at the other locations. The two locations were selected to be near the geometric center of the site where the highest concentrations of residual contamination (if any) would be expected to be occur.

Ecology Response: According to RL/WHC's response to question No. 74, the detonation pit at the site is not physically identifiable now, which means the depression has been refilled by outside materials. Thus, sampling in the soil from 0-6 in. may not even reach the true bottom of the demolition site. Revise the sampling scheme to accommodate a solution.

Ecology/RL/WHC Resolution: Through the DQO process all sampling and analytical concerns were resolved. Constituents of concerns and analytical methods were identified and agreed to by all parties. See the Sampling and Analysis Plan (SAP) for specific agreements.

50. 7-6, 26 **Deficiency.** The text states that the soil sampling will occur to a depth of eighteen inches below grade at six inch intervals. This is not adequate.

Requirement. At each sampling location, sampling and analysis for organics should be conducted for both the top layer and the next underlying layer and the depth of analysis must be substantially deeper. Provide explanation of how soil removed prior to sampling will be managed.

No.		Comments/Response	Concurrence

RL/WHC Response: The text does not indicate that samples will be taken at 6-in. intervals. Text specifies that one sample will be taken from the 6-18 in. interval. Sampling will be carried out in conformance with EII 5.2 (as indicated on line 24). All previous RCRA sampling at Hanford has been performed per this procedure since the procedure was promulgated in 1989. Ecology has regularly approved plans that specify sampling per this procedure. There are no provisions in EII 5.2 for management of soil that is removed prior to sampling. The soil would not be removed beyond the immediate vicinity of the sample location.

Ecology Response:

a. EII 5.2 only discusses soil sampling methodologies. In other words, it does not set criteria for sampling depths and intervals but rather to take the samples.

b. Handling of removed soil is not adequately addressed. A method, such as covering the removed soil or piling it, should be given.

c. Address the requirements.

Ecology/RL/WHC Resolution: Through the DQO process all sampling and analytical concerns were resolved. Constituents of concerns, analytical methods, sampling location, depth and general handling of samples were identified and agreed to by all parties. See the Sampling and Analysis Plan (SAP) for specific agreements.

51. 7-7, 6 **Deficiency.** Quantitation limits implemented as action levels must be justified.

Suggestion. Modify Table 4-1 to incorporate columns specifying the action levels associated with potential contaminants and the basis for

No.		Comments/Response	Concurrence
		such levels. For example, are specific action levels established from background measurements, detection limits, etc. RL/WHC Response: The citation does not state that quantitation limits would be implemented as action levels. RL and WHC do not propose quantitation limits as action levels in any case. Regarding action levels, refer to NOD # 21 comment response. Ecology Response: Refer action level to NOD No. 21 response. **Ecology/RL/WHC Resolution: Through the DQO process, action levels were defined and agreed to by all parties, as levels above the Hanford Site soil background levels identified in *Hanford Site Background: Part 1, Soil Background for Nonradioactive Analytes (DOE-RL 1993)* and Model Toxic Control Act (MTCA) (WAC 173-340) Method B levels.**	
52.	7-7, 10	**Deficiency.** Action levels must be determined prior to sampling. The text should mention when action levels will be proposed and contaminant levels will be compared against proposed action levels. More information is needed on the site background threshold values. At present, the Hanford Soil Background Study is going on, and Ecology has yet to receive and review the finalized values for various organics and inorganics of concern. **Requirement.** Revise text accordingly. See comment 24. RL/WHC Response: Regarding action levels, refer to NOD # 21 comment response. Regarding the Hanford Site-wide soil background study, refer to NOD # 24 comment response. Ecology Response: Refer action level to NOD No. 21 response and Hanford Site-wide soil background to NOD No. 24.	

No.		Comments/Response	Concurrence
		Ecology/RL/WHC Resolution: Through the DQO process, action levels were defined and agreed to by all parties, as levels above the Hanford Site soil background levels identified in *Hanford Site Background: Part 1, Soil Background for Nonradioactive Analytes (DOE-RL 1993)* and Model Toxic Control Act (MTCA) (WAC 173-340) Method B levels.	
53.	7-7, 17	**Deficiency.** Preparatory procedures lack detail and sample preparation is neglected. **Requirement.** Revise text accordingly. RL/WHC Response: All proposed EAL analytical methods, including information on sample preparation, will be submitted to Ecology for review and approval in advance of sampling. The requested information is not available at this time. Ecology Response: Reject. Information requested must be provided. Incorporate into closure before submitting revision 2. **Ecology/RL/WHC Resolution: Throughout the closure plan references to using the mobile onsite laboratory will be removed. Offsite laboratories capable of EPA analytical level III will be used for all soil samples.**	
54.	7-7, 19	**Deficiency.** Initial characterization analysis must be performed by EPA level III criteria (SW-846) which can only be performed by an EPA certified stationary laboratory. The mobile lab provides only level II analyses. Therefore, the mobile lab should only be used to aid in determining sampling locations and plume mapping during remediation. **Requirement.** Modify text accordingly.	

No.		Comments/Response	Concurrence

RL/WHC Response: Accepted. See comment response #2.

Ecology Response: See NOD No. 2 response.

Ecology/RL/WHC Resolution: Throughout the closure plan references to using the mobile onsite laboratory will be removed. Offsite laboratories capable of EPA analytical level III will be used for all soil samples.

55. 7-7, 41 **Deficiency.** Supercritical fluid extraction (SFE) is not appropriate due to the fact that it has yet to receive EPA approval.

Requirement. Revise the text to reflect the use of approved methods of sampling and analysis.

RL/WHC Response: Ecology's concern is noted. All proposed EAL analytical methods, including SFE, will be submitted to Ecology for review and approval in advance of sampling.

Ecology Response: Analytical methods must be submitted with closure plan. The closure plan can not be approved unless this information is reviewed in the context of the closure plan.

Ecology/RL/WHC Resolution: Through the DQO process all sampling and analytical concerns were resolved. Constituents of concerns and analytical methods were identified and agreed to by all parties. See the Sampling and Analysis Plan (SAP) for specific agreements.

56. 7-7, 44 **Deficiency.** X-ray fluorescence is not an approved method for metals characterization. It is only to be used as an in-field method to determine sampling locations or areas of contamination.

No.		Comments/Response	Concurrence

Requirement. Revise the text to reflect the use of approved methods of sampling and analysis.

RL/WHC Response: Ecology's concern is noted. All proposed EAL analytical methods, including XRF, will be submitted to Ecology for review and approval in advance of sampling. Additionally, the text of Revision 1 will describe the EAL as an analytical level II laboratory (see NOD #2 comment response), and will propose XRF as an analytical level II application.

Ecology Response: Analytical methods must be submitted with the closure plan. The closure plan can not be approved unless this information is reviewed in the context of the closure plan.

Ecology/RL/WHC Resolution: Throughout the closure plan references to using the mobile onsite laboratory will be removed. Offsite laboratories capable of EPA analytical level III will be used for all soil samples. Through the DQO process all sampling and analytical concerns were resolved. Constituents of concerns and analytical methods were identified and agreed to by all parties. See the Sampling and Analysis Plan (SAP) for specific agreements.

57. 7-7, 49 **Deficiency.** The discussion of the configuration of the analytical series does not address potential impacts on analytical results from variations in the configuration (i.e., burn off organics before analyzing for them)

Requirements. Address the influence of the configuration of the series on the analytical results.

RL/WHC Response: Accepted. "...in series." should read"...in parallel."

No.		Comments/Response	Concurrence
		Ecology Response: Since a gas chromatograph unit can only do one test at each specific time, give a more detailed explanation about the "parallel" staff. **Ecology/RL/WHC Resolution: Throughout the closure plan references to using the mobile onsite laboratory will be removed. Offsite laboratories capable of EPA analytical level III will be used for all soil samples. Through the DQO process all sampling and analytical concerns were resolved. Constituents of concerns and analytical methods were identified and agreed to by all parties. See the Sampling and Analysis Plan (SAP) for specific agreements.**	
58.	7-8, 4	**Deficiency.** Procedures for calibration of analytical equipment is said to be based on mobile lab and published EPA procedures. The concern is that combining the procedures could allow for manipulation of performance or not be consistent with EPA requirements. **Requirement.** Provide supporting evidence that these procedures will be consistent with EPA requirements. RL/WHC Response: Ecology's concern is noted. All proposed EAL analytical methods will be submitted to Ecology for review and approval in advance of sampling. Ecology Response: Analytical procedures must be submitted with closure plan. The closure plan can not be approved unless this information is reviewed in the context of the closure plan. **Ecology/RL/WHC Resolution: Throughout the closure plan references to using the mobile onsite laboratory will be removed. Offsite laboratories capable of EPA analytical level III will be used for all soil samples. Through the DQO process all sampling and analytical**	

No.		Comments/Response	Concurrence

concerns were resolved. Constituents of concerns and analytical methods were identified and agreed to by all parties. See the Sampling and Analysis Plan (SAP) for specific agreements.

59. 7-8, 31 **Deficiency.** Utilizing unapproved methods may lead to unacceptable data.

Requirement. Do not rely solely on this procedure.

RL/WHC Response: Ecology's concern is noted. All proposed EAL analytical methods, including SFE, will be submitted to Ecology for review and approval in advance of sampling.

Ecology Response: Analytical procedures must be submitted with closure plan. The closure plan can not be approved unless this information is reviewed in the context of the closure plan.

Ecology/RL/WHC Resolution: Throughout the closure plan references to using the mobile onsite laboratory will be removed. Offsite laboratories capable of EPA analytical level III will be used for all soil samples. Through the DQO process all sampling and analytical concerns were resolved. Constituents of concerns and analytical methods were identified and agreed to by all parties. See the Sampling and Analysis Plan (SAP) for specific agreements.

60. 7-8, 34 **Requirement.** See comment 57.

RL/WHC Response: See comment response #57.

Ecology Response: See NOD No. 57 response.

Ecology/RL/WHC Resolution: Through the DQO process all sampling and analytical concerns were resolved. Constituents of concerns and

No.		Comments/Response	Concurrence
		analytical methods were identified and agreed to by all parties. See the Sampling and Analysis Plan (SAP) for specific agreements.	
61.	7-8, 44	**Deficiency.** Detection limits for target RCRA metals are said to 20 micrograms per gram. Do these detection limits meet the Dangerous Waste requirements of background levels for characteristic and listed wastes and designation limits for state only wastes? **Requirement.** Compare the detection limits with the WAC 173-303 regulatory levels. RL/WHC Response: The one metal analyte of interest identified in Table 7-1 is chromium. The Hanford Site-wide background value (i.e., the 95/95 threshold value) for total chromium is 28 mg/kg (determined by ICP, per CLP specification). The maximum measured value was 320 mg/kg (Hoover et al, 1993). No site-wide background data have been determined for total chromium by XRF. (Results obtained by the two methods are not directly comparable.) The designation limit concentration for total chromium in soil proposed by Ecology (in letter from Roger Stanley to R. D. Izatt (1-10-92) re. "Soil Cleanup/Remediation Policy for Hanford") was 100 ppm. (DOE/RL 1992a). Ecology Response: Concur with the explanation. **Ecology/RL/WHC Resolution: Through the DQO process all sampling and analytical concerns were resolved. Constituents of concerns and analytical methods were identified and agreed to by all parties. See the Sampling and Analysis Plan (SAP) for specific agreements.**	
62.	7-8, 51	**Requirement.** See previous comment. RL/WHC Response: See comment response #62.	

No.		Comments/Response	Concurrence
		Ecology Response: The RL/WHC response to NOD number 62 is "see comment response #62." This is not an adequate response. See also NOD No. 61 response. **Ecology/RL/WHC Resolution: Through the DQO process all sampling and analytical concerns were resolved. Constituents of concerns and analytical methods were identified and agreed to by all parties. See the Sampling and Analysis Plan (SAP) for specific agreements.**	
63.	7-9, 8	**Deficiency.** The on-site mobile laboratory's capabilities are not equivalent to analytical level III. Verification analysis must be performed by EPA level III criteria (SW-846), which can only be performed by an EPA accredited laboratory. The mobile lab provides only level II analyses. **Requirement.** Unless accredited, the mobile lab should only be used to aid in determining sampling locations and plume mapping during site initial characterization. RL/WHC Response: Accepted. See comment response #2. Ecology Response: See NOD No. 2 response. **Ecology/RL/WHC Resolution: Throughout the closure plan references to using the mobile onsite laboratory will be removed. Offsite laboratories capable of EPA analytical level III will be used for all soil samples. Through the DQO process all sampling and analytical concerns were resolved. Constituents of concerns and analytical methods were identified and agreed to by all parties. See the Sampling and Analysis Plan (SAP) for specific agreements.**	

No.		Comments/Response	Concurrence
64.	7-10, 1	**Requirement.** On-site mobile laboratory calibration procedures must be fully compliant with EPA requirements. RL/WHC Response: Accepted. See comment response #2. Ecology Response: Concur. **Ecology/RL/WHC Resolution: Throughout the closure plan references to using the mobile onsite laboratory will be removed. Offsite laboratories capable of EPA analytical level III will be used for all soil samples.**	
65.	7-9, 10	**Deficiency.** Calibration of instruments only once a day, or shift, may introduce significant error. Calibration may be effected by varying environmental conditions throughout the day, such as a change in temperature or humidity. **Requirement.** Calibration schedules must respond to fluctuations in ambient environmental conditions. RL/WHC Response: The specific nature of this concern is unclear. The citation on page 7-9, line 10 does not address the subject of calibration. The reviewer's intent may have been to cite page 7-10, line 12. The intent of RL and WHC on the issue of calibration is to conform to the statements appearing on page 7-10, lines 1-6, and Section 7A-6 of the QAPjP. The sentence on page 7-10, lines 12-14 will be eliminated from Revision 1 to avoid any potential conflict or the appearance of conflict between these statements. Ecology Response: Concur.	

No.		Comments/Response	Concurrence
		Ecology/RL/WHC Resolution: The Quality Assurance and the Quality Control sections of Chapter 7 was deemed repetitious with the Quality Assurance Project Plan in Appendix 7A and therefore removed. Offsite laboratories capable of EPA analytical level III will be used for all soil samples.	
66.	7-11, 35	**Requirement.** All clean closure sample date should be compiled and submitted in Contract Laboratory Procedure (CLP) format. Consult SW-846, Chapter 1, for guidance on the forms which are appropriate. RL/WHC Response: The text already cites SW-846, Chapter 1 for guidance on documentation (see lines 45-46). CLP format is not a requirement of WAC 173-303. Ecology Response: It is true that WAC 173-303 does not require the CLP format. But, since the RCRA unit is located within a CERCLA operable unit, the CLP format will be required in the remedial action by CERCLA. It is advised, therefore, that the test results should be not less than 10% CLP deliverable SW-846. **Ecology/RL/WHC Resolution: Through the DQO process all sampling and analytical concerns were resolved. Constituents of concerns and analytical methods were identified and agreed to by all parties. See the Sampling and Analysis Plan (SAP) for specific agreements.**	
67.	7-12, 34	**Deficiency.** WAC 173-303-610 is not included in the citations consulted for the development of soil cleanup action levels. **Requirement.** To be considered clean closure, soil contamination must be less than or equal to background or designation limit for state only wastes. If soil contamination concentrations are greater than those just stated, they would be considered a modified landfill closure. This	

No.	Comments/Response	Concurrence

would require compliance with reduced landfill requirements. Also see comment 25.

RL/WHC Response: See comment response #25 and #26.

Ecology Response: Refer to NOD Nos. 25 and 26 responses.

Ecology/RL/WHC Resolution: Through the DQO process all parties agreed that to meet criteria for clean closure of the Ash Pit Demolition Site, the soil sampling and analytical results must verify that the levels of discarded explosive chemical products derived from the Ash Pit Demolition Site operations are below action levels. Agreed action levels are defined as levels above the Hanford Site soil background levels identified in *Hanford Site Background: Part 1, Soil Background for Nonradioactive Analytes* and Model Toxic Control Act (MTCA) Method B levels.

68. 7-13, 12 **Deficiency.** The determination of sampling locations by using random algorithm for initial characterization as specified in section 7.2.3 is acceptable. But the location of sampling points for calculation of the volume of contaminated soil demands a systematic protocol. Sampling plans with well defined grid spacing, locations, etc., might vary depending on the results obtained in the inial characterization.

Requirement. The sampling plan will require approval prior to implementation.

RL/WHC Response: Accepted.

Ecology Response: Concur.

No.		Comments/Response	Concurrence

Ecology/RL/WHC Resolution: Through the DQO process all sampling and analytical concerns were resolved. Constituents of concerns and analytical methods were identified and agreed to by all parties. See the Sampling and Analysis Plan (SAP) for specific agreements.

69. 7-13, 29 **Deficiency.** The proposed two feet vertical depth for sampling is inadequate.

Requirement. Significantly increase the proposed sampling depth. Consider twelve foot depth.

RL/WHC Response: See comment response #48.

Ecology Response: See NOD No. 47 response.

Ecology/RL/WHC Resolution: Through the DQO process all sampling and analytical concerns were resolved. Constituents of concerns and analytical methods were identified and agreed to by all parties. See the Sampling and Analysis Plan (SAP) for specific agreements.

70. 7-14, 12 **Note.** The application of water during removal to control dust needs careful examination and will depend on the contaminant of concern. There is a good chance that contaminants can migrate with water downward during the process. This is especially so since excavation is limited. Other dust control devices may have to be applied depending on the nature of the contaminants.

RL/WHC Response: Accepted. (No change to text at this time.)

Ecology Response: Concur.

No.		Comments/Response	Concurrence
71.	7-15, 15	**Deficiency.** Regulatory requirements require that verification sample analysis be done at level III or IV. A mobile laboratory does not qualify. **Requirement.** Verification analyses must be done by EPA approved methodology, SW-846, some of which can only be done in a stationary laboratory. RL/WHC Response: Accepted. See comment response #2. Ecology Response: Concur. **Ecology/RL/WHC Resolution: Throughout the closure plan references to using the mobile onsite laboratory will be removed. Offsite laboratories capable of EPA analytical level III will be used for all soil samples.**	
72.	7-16, 14	**Deficiency.** A closure plan can be amended prior to final closure but only with approval from the lead regulatory agency which is Ecology in this case. This requirement was ambiguously presented in the closure plan. **Requirement.** Revise the text. **RL/WHC Response: See page 7-16, line 17-20 for clarification.** **Ecology Response: Concur.** **Ecology/RL/WHC Resolution: No change.**	
73.	F7-1	**Requirement.** Provide a direction arrow. RL/WHC Response: Accepted.	

No.		Comments/Response	Concurrence
		Ecology Response: Concur. **Ecology/RL/WHC Resolution: Old Figure 7-1 depicting a proposed sampling grid will be removed since it has been nullified by the approved Sampling and Analysis Plan.**	
74.	F7-1	**Requirement.** Show the location of the detonation pit. RL/WHC Response: Presently, there is no physically identifiable detonation pit at the site. However, the depression was still evident at the time the fenced boundary was established. Figure F7-1 represents precise coordinates of surveyed monuments that were placed approximately 10 feet out from the present 20 by 20 foot fence boundary. The reason the site was surveyed and the monuments located 10 feet outside the fence boundary was to ensure a wide, complete, and surveyed sampling area. The 20 by 20 foot fence site boundary can be approximated and overlained on top of this figure. Ecology Response: The location of the detonation site must be shown on the figure. **Ecology/RL/WHC Resolution: Old Figure 7-1 depicting a proposed sampling grid will be removed since new sampling locations are provided by the approved Sampling and Analysis Plan. Through the DQO process all sampling and analytical concerns were resolved. Constituents of concerns and analytical methods were identified and agreed to by all parties. See the Sampling and Analysis Plan (SAP) for specific agreements.**	
75.	F7-1	**Deficiency.** Sampling locations are not biased to include downwind areas.	

No.		Comments/Response	Concurrence

Requirement. Sampling must be done to characterize all potentially contaminated areas.

RL/WHC Response: See comment response #48.

Ecology Response: See NOD Nos. 47 and 48 responses.

Ecology/RL/WHC Resolution: Old Figure 7-1 depicting a proposed sampling grid will be removed since it has been nullified by the Sampling and Analysis Plan. Through the DQO process all sampling and analytical concerns were resolved. Constituents of concerns, analytical methods and sampling locations were identified and agreed to by all parties. See the Sampling and Analysis Plan (SAP) for specific agreements.

76. F7-1 **Deficiency.** Surface sampling in the middle of the site (probably the pit) is not adequate. The contamination of wastes in the center of the site is suspected to be the greatest and deepest.

Requirement. Modify the sampling plan and figure to address deficiencies.

RL/WHC Response: See comment response #48.

Ecology Response: See NOD Nos. 47 and 48 responses.

Ecology/RL/WHC Resolution: Old Figure 7-1 depicting a proposed sampling grid will be removed since it has been nullified by the Sampling and Analysis Plan Agreements. Through the DQO process all sampling and analytical concerns were resolved. Constituents of concerns and analytical methods were identified and agreed to by all parties. See the Sampling and Analysis Plan (SAP) for specific agreements.

No.		Comments/Response	Concurrence
77.	T7-1	**Deficiency.** This table is inadequate. **Requirement.** Regulated decomposition and reaction products must be included in the list of target analytes. Appropriate methodologies, action levels, and detection limits need to be listed. RL/WHC Response: Regarding decomposition and reaction products: Recognized decomposition and reaction products are identified and discussed on Pages 7-4 and 7-5. Recognized products that may be constituents of potential regulatory concern are listed in the Table. (Also refer to NOD # 22 comment response.) Regarding methodologies: Methodologies for initial sampling and analysis in the EAL are identified in the table to the extent that RL/WHC is able to do so at this time (in advance of issuance of EAL procedure manuals). Formal EAL analytical procedures are in preparation. Copies of all EAL analytical procedures will be submitted to Ecology for review and approval in advance of sampling. Anticipated relationships between EAL procedures and published EPA methods (and other methods) are discussed in Section 7.2.4. Regarding action levels: A table listing proposed action levels for the analytes of interest identified in Table 7-1 will be prepared for inclusion in Section 6.0 of Revision 1. Regarding detection limits: Practical quantitation limits (PQLs) are listed in Table 7A-1 of the QAPjP. The same analytes are listed in Tables 7-1 and 7A-1. An explanatory note will be attached to Table 7-1 indicating where the PQL information is provided. Ecology Response:	

No.		Comments/Response	Concurrence

a. Refer to NOD No. 22 response for the issue of decomposition and reaction products.

b. Give the specific method no. from SW-846.

c. Refer the action level to NOD No. 21 response.

d. PQLs are different for different materials at different laboratories. Thus, relate them to each analyte and the laboratories which will be used to test them.

Ecology/RL/WHC Resolution: Table 7-1 depicting a proposed Analytes of Interest will be removed since it has been nullified by the Sampling and Analysis Plan Agreements. Through the DQO process all sampling and analytical concerns were resolved. Constituents of concerns and analytical methods were identified and agreed to by all parties. See the Sampling and Analysis Plan (SAP) for specific agreements.

78. 8-2, 15 **Deficiency.** This is not an adequate explanation of potential integration of RCRA with CERCLA.

Requirement. If such an approach is to be considered, a much more elaborate discussion must be provided. Yearly inspection of the site until CERCLA remediation is not adequate. Methods to integrate sampling and analysis requirements, minimize the migration of wastes, and security of the site until remediation would have to be developed.

RL/WHC Response: Yearly inspection is a minimal base line. Actual inspection intervals will not be determined until after sample results are received and evaluated. If it is determined that post-closure documentation is necessary than a detailed and specific plan will be developed.

No.	Comments/Response	Concurrence

Ecology Response: Whether there is integration between RCRA and CERCLA or not, 200 W. APDS must meet the postclosure care requirements of WAC 173-303-680(2) if the contaminated soils or ground water cannot be completely removed or decontaminated during closure. See also NOD No. 20 response.

Ecology/RL/WHC Resolution: As long as the Ash Pit Demolition Site is a TSD unit the requirements of RCRA will be addressed.

79. Appendix **Comment.** A general comment about the Appendix is that it is inadequate.

Suggestion. Provide information about process knowledge, spill/occurrence reports, and the detonation event (i.e., a description of the actual event and environmental conditions).

RL/WHC Response: The requested information has not been provided in any previous QAPjP prepared by RL and WHC. Process knowledge information has already been provided in Chapter 3 of the closure plan. There were no spill/occurrence to report and the detonation event is described in other locations in the closure plan.

Ecology Response: The information required is for the purpose of understanding of this specific document. It is incomparable to whatever has been done elsewhere. Without thorough explanation, it would be very difficult to fully assess the impact done to the environment by the demolition event. For example, without the evidence of legitimate documentation, simply changing the waste inventory for the site when questions were raised by the regulators is not acceptable.

Ecology/RL/WHC Resolution: The inventory has been agreed to and approved by all parties. Text has been revised to reflect accepted inventory.

No.		Comments/Response	Concurrence

Detail process knowledge and the detonation event has been revised and is located in Chapters 3 and 4.

80. 7A-1, 25 **Deficiency.** The objective of the investigation is to determine the extent of contamination at the site. Surface sampling is specified as the objective of the investigation. This is not correct.

Requirement. Revise the text accordingly.

RL/WHC Response: Accepted. Lines 25-27 will be revised to read: "The principal objective of initial (investigative) sampling will be to identify the presence and extent of dangerous waste constituents in surface soils at the site relative to levels of potential regulatory concern."

Ecology Response: Concur with the addition of the principal objective of initial (investigative) sampling. However, the depth of surface soil should be given. Refer the requirement on initial sampling depth to NOD No. 47 response.

Ecology/Rl/WHC Resolution: Text in 7A-1, lines 26-29 was revised to read: "The principal objective of phase one investigative sampling is to facilitate a RCRA clean closure of the site by verifying that the concentrations of all detonation activity contaminants are at or below action levels." Specific sampling and analysis agreements can be found in the Sampling Analysis Plan.

81. 7A-1, 43 **Requirement.** If remediation is required, confirmatory samples are required and must be done in an EPA approved laboratory at level III analysis.

RL/WHC Response: Accepted. See comment response #2.

No.		Comments/Response	Concurrence

Ecology Response: See NOD No. 2 response.

Ecology/RL/WHC Resolution: Throughout the closure plan references to using the mobile onsite laboratory will be removed. Offsite laboratories capable of EPA analytical level III will be used for all soil samples. Through the DQO process all sampling and analytical concerns were resolved. Constituents of concerns and analytical methods were identified and agreed to by all parties. See the Sampling and Analysis Plan (SAP) for specific agreements.

82. 7A-2, 4 **Suggestion.** EPA-QZMS-005/80, "Interim Guidelines and Specifications for Preparing Quality Assurance Project Plans," should also be referenced.

RL/WHC Response: Accepted.

Ecology Response: Concur.

83. 7A-10,17 **Deficiency.** The reference provided for validation procedures, "Data Validation Procedures for Chemical Analysis (WHC-SD-EN-SPP-002)," is a validation procedure for Contract Laboratory Program (CLP) sample data, not analyses performed under SW-846. The correct reference should be: Sample Management and Administration (WHC-CM-5-3).

Requirement. Revise the text accordingly.

RL/WHC Response: Accepted.

Ecology Response: Concur.

Ecology/RL/WHC Resolution: <u>Date Validation Procedures for Chemical Analyses</u> (WHC-SD-EN-SPP-002) is a document that provides procedures to WHC staff and subcontractors tasked

No.	Comments/Response	Concurrence
	with the validation of chemical analytical data produced as the result of Hanford Site environmental investigations. This document is a supplement to the Sample Management and Administration document (WHC-CM-5-3) which includes validation procedures for sample data performed under SW-846.	

200 WEST AREA ASH PIT DEMOLITION SITE CLOSURE PLAN

FOREWORD

The Hanford Site is owned by the U.S. Government and operated by the U.S. Department of Energy, Richland Operations Office. Dangerous waste and mixed waste (containing both radioactive and dangerous components) are produced and managed on the Hanford Facility. The dangerous waste is regulated in accordance with the *Resource Conservation and Recovery Act of 1976* and the *State of Washington Hazardous Waste Management Act of 1976* (as administered through the Washington State Department of Ecology *Dangerous Waste Regulations*, Washington Administrative Code 173-303). The radioactive component of mixed waste is interpreted by the U.S. Department of Energy to be regulated under the *Atomic Energy Act of 1954*; the nonradioactive dangerous component of mixed waste is interpreted to be regulated under the *Resource Conservation and Recovery Act* and Washington Administrative Code 173-303.

For purposes of the *Resource Conservation and Recovery Act* and the Washington State Department of Ecology *Dangerous Waste Regulations*, the Hanford Facility is considered to be a single facility. The single dangerous waste permit identification number issued to the Hanford Facility by the U.S. Environmental Protection Agency and the Washington State Department of Ecology is U.S. Environmental Protection Agency/State Identification Number WA7890008967. This identification number encompasses over 60 treatment, storage, and/or disposal units within the Hanford Site, hereinafter referred to as the Hanford Facility when cited in the context of the *Resource Conservation and Recovery Act* and the Washington State Department of Ecology *Dangerous Waste Regulations*.

For the purposes of the *Resource Conservation and Recovery Act*, Westinghouse Hanford Company is identified as 'co-operator'. Any identification of Westinghouse Hanford Company as an operator elsewhere in this closure plan is not meant to conflict with Westinghouse Hanford Company's designation as a co-operator but rather is based on Westinghouse Hanford Company's contractual status (i.e., as a management and operations contractor) for the U.S. Department of Energy, Richland Operations Office.

The *200 West Area Ash Pit Demolition Site Closure Plan* consists of a Part A, Form 3, Dangerous Waste Permit Application (Revision 4) and a closure plan. An explanation of the Part A, Form 3, submitted with this closure plan is provided at the beginning of the Part A Section. The closure plan consists of nine chapters and five appendices.

This *200 West Area Ash Pit Demolition Site Closure Plan* submittal contains information current as of August 28, 1994.

This page intentionally left blank.

CONTENTS

APPENDICES

This page intentionally left blank.

GLOSSARY

Ash Pit Demolition Site	200 West Area Ash Pit Demolition Site
ASTM	American Society of Testing and Materials
C.A.S.	Chemical Abstract System
CERCLA	*Comprehensive Environmental Response, Compensation, and Liability Act of 1980*
CFR	*Code of Federal Regulations*
DOE-RL	U.S. Department of Energy, Richland Operations Office
DQO	data quality objectives
Ecology	Washington State Department of Ecology
EII	environmental investigation instruction
EIS	environmental impact statement
EPA	U.S. Environmental Protection Agency
HEAST	Health Effects Assessment Summary Tables
HEIS	Hanford Environmental Information System
IRIS	Integrated Risk Information System
MTCA	*Model Toxics Control Act*
QAPjP	quality assurance project plan
QI	quality instruction
QR	quality requirement
RCRA	*Resource Conservation and Recovery Act of 1976*
RfD	Reference Dose
SAP	Sampling and Analysis Plan
Tri-Party Agreement	*Hanford Federal Facility Agreement and Consent Order*
TSD	treatment, storage, and/or disposal
WAC	*Washington Administrative Code*

This page intentionally left blank.

PART A

The Part A permit application, Form 1, included in this closure plan was submitted to the Washington State Department of Ecology in May 1988. The Part A, Form 1, consists of three pages.

The 200 West Area Ash Pit Demolition Site Part A, Form 3, Revision 0, was submitted to Ecology in November 1985. Revision 1 of the Part A, Form 3, was prepared to provide more extensive unit, process, and dangerous waste descriptions, and to remove dangerous waste code D001. Also, one drawing was revised and one drawing and one photograph were removed. Revision 2 of the Part A, Form 3, was prepared to include Westinghouse Hanford Company as co-operator of the 200 West Area Ash Pit Demolition Site. Revision 3 of the Part A, Form 3, was prepared to correct process design capacities, to provide more detailed process and dangerous waste descriptions, and to add dangerous waste codes D001, D002, WT01, and WT02. Also, the site drawing was revised and a new photograph was provided. Revision 4 of the Part A, Form 3, was prepared to delete state-only dangerous waste code WC01 and replace it with WC02 in accordance with WAC 173-303, as amended in December 1993 and to correct a rounding error. Also, new photographs were provided.

The Part A, Form 3, (Revision 4) included in this closure plan consists of seven pages, one figure, and one photograph.

This page intentionally left blank.

PART A

The Hanford Facility Dangerous Waste Part A Permit Application, Form 3, Revision 4 for the 200 West Area Ash Pit Demolition Site is being certified and will be submitted at a later date.

This page intentionally left blank.

CONTENTS

This page intentionally left blank.

1.0 INTRODUCTION

This chapter provides background information for the 200 West Area Ash Pit Demolition Site (Ash Pit Demolition Site) and provides an overview of the contents of the Ash Pit Demolition Site closure plan.

1.1 BACKGROUND

The Ash Pit Demolition Site had two known demolition events, the first occurred in November of 1984, and the second occurred in June of 1986. These demolition events were a form of thermal treatment for discarded explosive chemical products. Because the Ash Pit Demolition Site will no longer be used for this thermal activity, the site will be closed. Closure will be conducted pursuant to the requirements of the Washington State Department of Ecology (Ecology) "Dangerous Waste Regulations", *Washington Administrative Code* (WAC) 173-303-610 and 40 *Code of Federal Regulations* (CFR) 270.1.

This closure plan presents a description of the Ash Pit Demolition Site, the history of the waste treated, and the approach that will be followed to close the Ash Pit Demolition Site. Because there were no radioactively contaminated chemicals involved in the demolitions, the information on radionuclides is provided for "information only". Remediation of any radioactive contamination is not within the scope of this closure plan. Only dangerous constituents derived from Ash Pit Demolition Site operations will be addressed in this closure plan in accordance with WAC 173-303-610(2)(b)(i).

The Ash Pit Demolition Site is located within the 200-SS-2 (source) and 200-UP-1 (groundwater) operable units as designated in the *Hanford Federal Facility Agreement and Consent Order* (Tri-Party Agreement) (Ecology et al. 1994). The soil and groundwater of these operable units, 200-SS-2 and 200-UP-1, will be addressed through the *Comprehensive Environmental Response, Compensation, and Liability Act* (CERCLA) *of 1980* remedial investigation/feasibility study process. Therefore, any required remedial action, with respect to contaminants not associated with the Ash Pit Demolition Site, will be deferred to the CERCLA remedial investigation/feasibility study process. Characterization work on the 200-SS-2 operable unit is not expected to begin until sometime after fiscal year 1999. A work plan for the 200-UP-1 groundwater operable unit was completed in fiscal year 1993, with field investigation to continue through fiscal year 1995.

1.2 OBJECTIVE

The objective of this closure plan is to describe and support clean closure of the Ash Pit Demolition Site. Clean closure as used in this context means that no dangerous waste or dangerous waste contaminated soil will remain onsite that pose a threat to human health and the environment. To meet the criteria for clean closure of the Ash Pit Demolition Site, soil sampling and analytical results must verify that the levels of discarded explosive chemical products derived from Ash Pit Demolition Site operations are below action

levels. Action levels are defined as levels above the Hanford Site soil background levels identified in *Hanford Site Background: Part 1, Soil Background for Nonradioactive Analytes* (DOE-RL 1993) and Model Toxic Control Act (MTCA) (WAC 173-340) Method B levels. If analysis determines that levels of the discarded explosive chemical products derived from Ash Pit Demolition Site operations are above both these guidelines, a phase two investigation will be developed.

1.3 200 WEST AREA ASH PIT DEMOLITION SITE CLOSURE PLAN CONTENTS

The Ash Pit Demolition Site closure plan consists of the following nine chapters.

- Introduction (Chapter 1.0)
- Facility Description (Chapter 2.0)
- Process Information (Chapter 3.0)
- Waste Characteristics (Chapter 4.0)
- Groundwater Monitoring (Chapter 5.0)
- Closure Strategy and Performance Standards (Chapter 6.0)
- Closure Activities (Chapter 7.0)
- Postclosure Plan (Chapter 8.0)
- References (Chapter 9.0).

A brief description of each chapter is provided in the following sections.

1.3.1 Facility Description (Chapter 2.0)

This chapter provides a brief description of the Hanford Site, Hanford Facility, and the location and description of the Ash Pit Demolition Site. Information on Hanford Site security also is provided.

1.3.2 Process Information (Chapter 3.0)

This chapter describes how the discarded explosive chemical products were processed and explains the overall waste treatment system at the Ash Pit Demolition Site.

1.3.3 Waste Characteristics (Chapter 4.0)

This chapter discusses the waste inventory and the characteristics of the waste that was treated at the Ash Pit Demolition Site.

1.3.4 Groundwater Monitoring (Chapter 5.0)

This chapter discusses the probability that groundwater contamination has not occurred and that groundwater monitoring is not needed.

1.3.5 Closure Strategy and Performance Standards (Chapter 6.0)

This chapter discusses the closure strategy, performance standards for protection of health and the environment, and provides an overview of closure activities.

1.3.6 Closure Activities (Chapter 7.0)

This chapter describes the closure activities.

1.3.7 Postclosure Plan (Chapter 8.0)

This chapter outlines provisions for postclosure care if required.

1.3.8 References (Chapter 9.0)

References used throughout this closure plan are listed in this chapter. All references listed here, which are not available from other sources, will be made available for review, upon request, to any regulatory agency or public commentor. References can be obtained by contacting the following:

Administrative Records Specialist
Public Access Room H6-08
Westinghouse Hanford Company
P.O. Box 1970
Richland, Washington 99352

This page intentionally left blank.

CONTENTS

APPENDIX

FIGURES

This page intentionally left blank.

2.0 FACILITY DESCRIPTION

This chapter briefly describes the Hanford Site, the Hanford Facility, and the location of the Ash Pit Demolition Site, and provides information on the Hanford Site security.

2.1 GENERAL HANFORD SITE DESCRIPTION

The Hanford Site covers approximately 560 square miles (1,450 square kilometers) of semiarid land that is owned by the U.S. Government and operated by the U.S. Department of Energy, Richland Operations Office (DOE-RL). The Hanford Site is located northwest of the city of Richland, Washington (Figure 2-1). The city of Richland adjoins the southeasternmost portion of the Hanford Site boundary and is the nearest population center. In early 1943, the U.S. Army Corps of Engineers selected the Hanford Site as the location for reactor, chemical separation, and related activities for the production and purification of special nuclear materials and other nuclear activities. The mission of the Hanford Site is now focused on waste management and environmental remediation and restoration.

Activities on the Hanford Site are centralized in numerically designated areas. The reactors are located along the Columbia River in the 100 Areas. The reactor fuel reprocessing units are in the 200 Areas, which are on a plateau approximately 7 miles (11 kilometers) from the Columbia River. The 300 Area, located adjacent to and north of Richland, contains the research and development laboratories. The 400 Area, 5 miles (8 kilometers) northwest of the 300 Area, contains the Fast Flux Test Facility, which was used for testing liquid metal reactor systems. The 600 Area covers all locations not specifically given an area designation. Adjacent to and north of Richland, the 1100 Area contains offices associated with administration, maintenance, transportation, and materials procurement and distribution. The 3000 Area, between the 1100 Area and 300 Area, contains engineering offices and administrative offices. Administrative offices also are located in the 700 Area, which is in downtown Richland.

2.2 FACILITY DESCRIPTION AND GENERAL PROVISIONS

The Hanford Facility is a single *Resource Conservation and Recovery Act of 1976* (RCRA) facility identified by the U.S. Environmental Protection Agency (EPA)/State Identification Number WA7890008967 that consists of over 60 treatment, storage, and/or disposal (TSD) units conducting dangerous waste management activities. These TSD units are included in the *Hanford Facility Dangerous Waste Part A Permit Application* (DOE-RL 1988b). The Hanford Facility consists of all contiguous land, and structures, other appurtenances, and improvements on the land, used for recycling, reusing, reclaiming, transferring, storing, treating, or disposing of dangerous waste, which, for the purposes of the RCRA, are owned by the U.S. Government and operated by the DOE-RL.

2.3 DESCRIPTION OF 200 WEST AREA ASH PIT DEMOLITION SITE

The Ash Pit Demolition Site is located in the eastern portion of the 200 West Area controlled-access area (Figure 2-2). Figure 2-3 details the layout of the Ash Pit Demolition Site. Photographs of the Ash Pit Demolition Site are included in Appendix 2A.

The Ash Pit Demolition Site is situated in a multi-use borrow pit area. The entire borrow pit area is approximately 600 feet (183 meters) by 800 feet (244 meters). The floor of the borrow pit was graded sometime before the demolition activities conducted in 1984. Portions of the borrow pit have been used for a variety of other activities, including burning of tumbleweeds and soil excavation for construction material. Both the burning and the soil removal activities occurred away from the detonation site. The Ash Pit Demolition Site occupied only a small portion [an area 20 feet (6 meters) by 20 feet (6 meters)] of the large borrow pit, and is located away from the other activities.

There were only two known demolition activities: November 1984 and June 1986. The discarded explosive chemical products generally were placed in a shallow depression, 6 inches (15 centimeters) to 12 inches (30 centimeters) deep, dug expressly for the demolition activity. The depression was still evident at the time of demarcation. The site was staked and roped off with a chain fence in 1988. The area roped off is approximately 20 feet (6 meters) by 20 feet (6 meters) square. Surveyed monuments have been placed around the Ash Pit Demolition Site.

2.4 SECURITY INFORMATION

The entire Hanford Site is a controlled-access area. The Hanford Site maintains around-the-clock surveillance for the protection of government property, classified information, and special nuclear materials. The Hanford Patrol maintains a continuous presence of protected force personnel to provide additional security.

Manned barricades are maintained around the clock at checkpoints on vehicular access roads leading to the 200 Areas. All personnel accessing these, and other Hanford Site areas, must have a U.S. Department of Energy-issued security identification badge indicating the appropriate authorization. Personnel also might be subject to a search of items carried into or out of these areas.

The Ash Pit Demolition Site is isolated from other portions of the area (at a minimum) by a chain fence with warning signs along the chain. The signs state, "DANGER--UNAUTHORIZED PERSONNEL KEEP OUT", are in English, visible from all angles of approach, and are legible from a distance of at least 25 feet (7.6 meters). In addition to these signs, the fences around the 200 Areas are posted with signs warning against unauthorized entry. The signs are visible from all angles of approach.

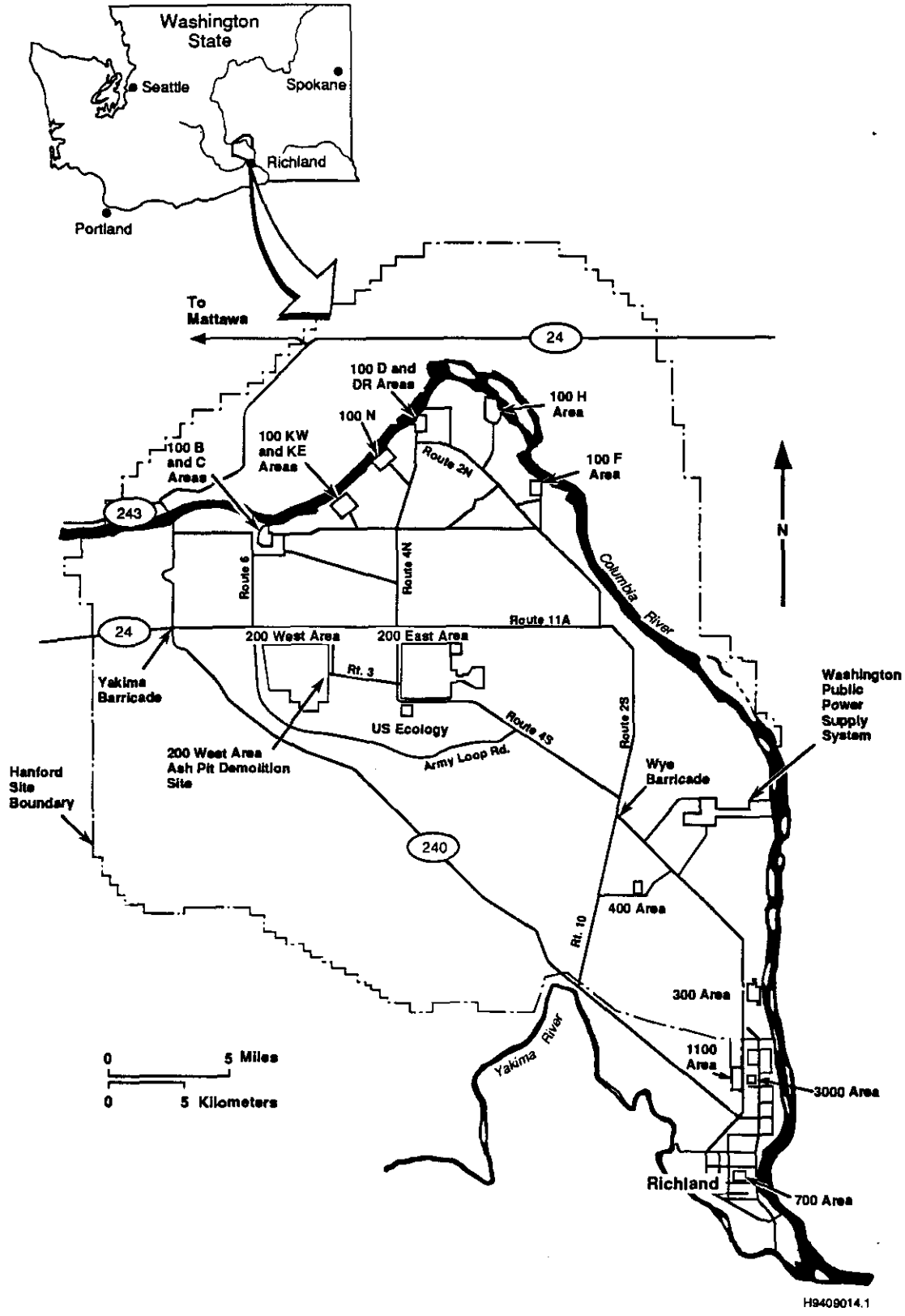


Figure 2-1. Hanford Site.

940923.0856

THIS PAGE INTENTIONALLY
LEFT BLANK

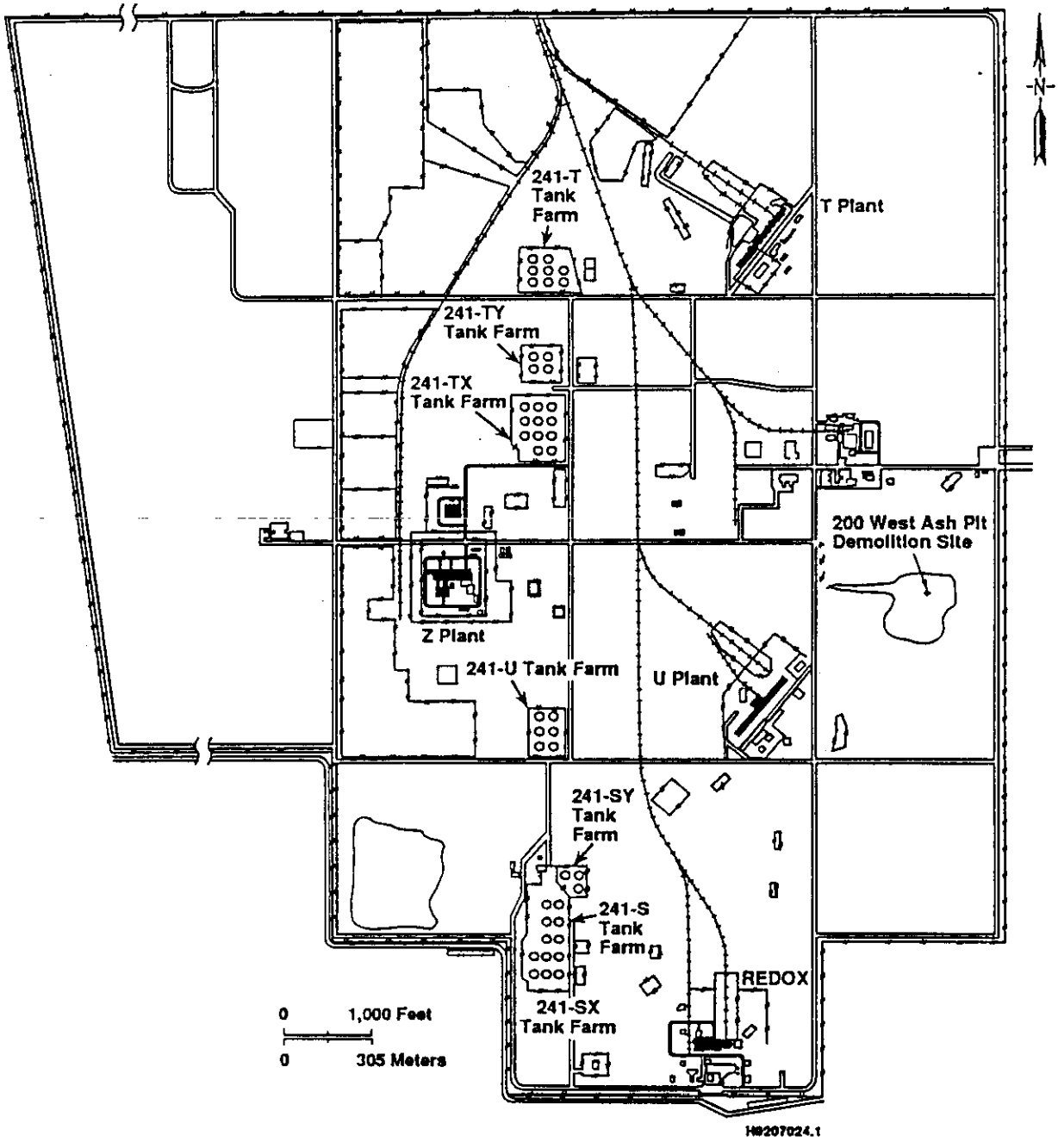


Figure 2-2. 200 West Area.

940923.0856

THIS PAGE INTENTIONALLY
LEFT BLANK

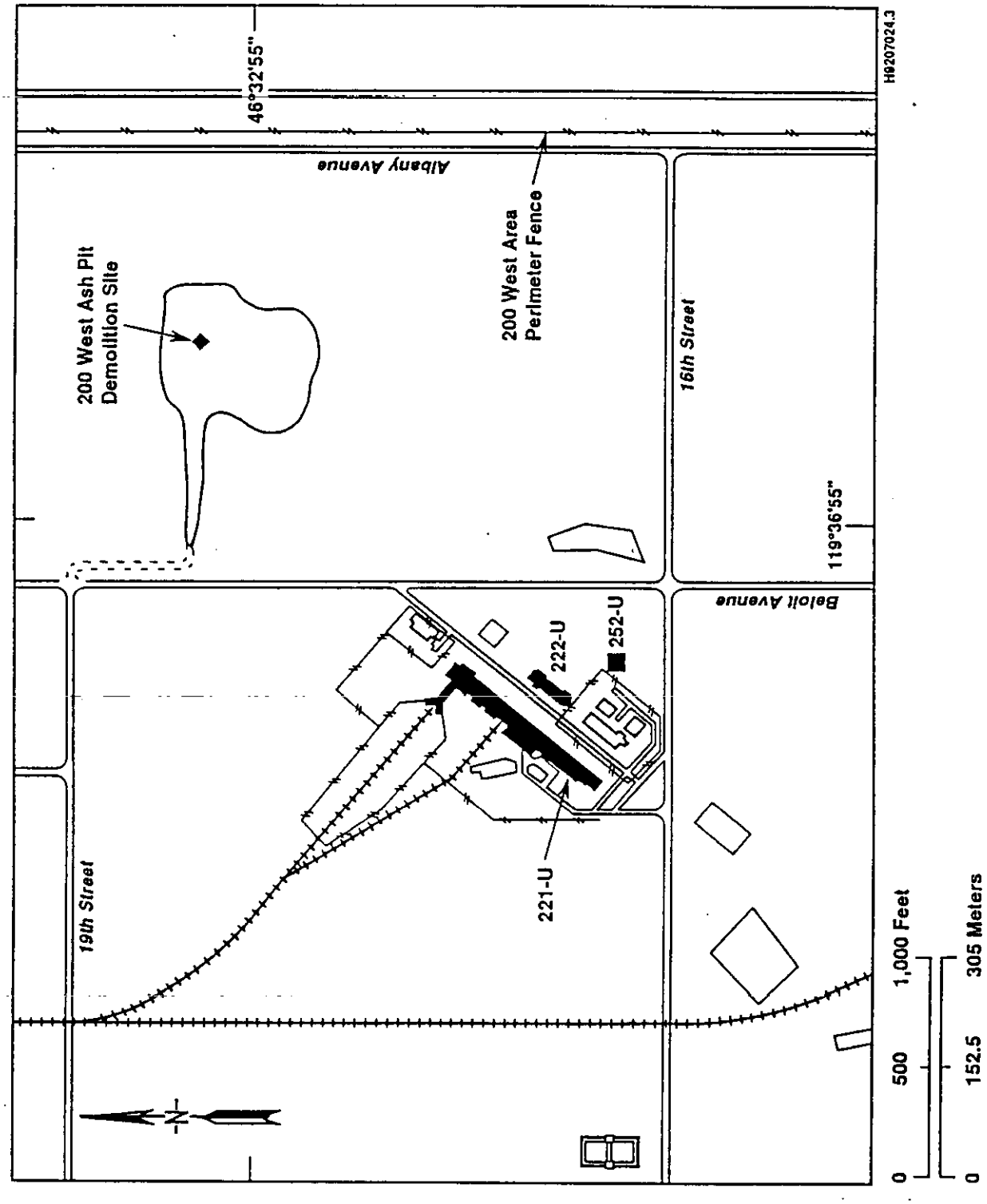


Figure 2-3. 200 West Area Ash Pit Demolition Site Layout.

940923.0856

THIS PAGE INTENTIONALLY
LEFT BLANK

CONTENTS

This page intentionally left blank.

3.0 PROCESS INFORMATION

The chemicals detonated at the Ash Pit Demolition Site were discarded explosive chemical products that were determined to be either in excess or beyond designated stock life. The detonation activities were limited to two events: November of 1984 and June of 1986. The two detonation events were performed at the same location. The detonations were performed during off-work hours under the observation of the Hanford Patrol, the Richland Police Department Bomb Squad, the Hanford Fire Department, and the onsite solid waste engineering organization. The Richland Police Department Bomb Squad provided all explosives and demolition material, wired the explosives, and performed all actual detonations. The onsite solid waste engineering organization coordinated all onsite activities for the Hanford Site contractors, handled the chemicals, and placed the explosives. The Hanford Patrol provided security to prevent inadvertent intrusion by personnel not participating in the demolition activity. The Hanford Fire Department was present to render assistance in case of an accident.

A checklist of the chemical inventory was prepared before detonation activities. The explosive chemical products were checked off the list and placed into a portable bomb containment vessel for transportation to the demolition site. The discarded explosive chemical products, in their original closed containers, were placed in a shallow depression dug specifically for the detonating event. Conventional explosives (nitroglycerin dynamite and detonating cord) were placed around and on top of the chemical product containers and surrounded with a blasting agent. The charges were configured in a manner that channeled the explosive force downward. In addition to the explosives identified above, the 1986 detonation had four partially full plastic 1-gallon bottles of unleaded gasoline placed around the blasting pit. The plastic bottles were wrapped in detonating cord and initiated on a primary blasting cap (initiated first). The resulting "fireball" added heat to the explosion. The explosive chemical products were detonated in their original, closed containers as a safety precaution.

After each detonation, the site was inspected. There was no evidence of remaining explosives, chemicals, or containers after the detonations, with the exception of the sides of one metal container from the 1986 detonation. The partial container was found empty and burned. The remains of the container were disposed in a sanitary landfill. Because the 1984 detonation was at night, the area was searched with spotlights and flashlights immediately after the detonation. The area was reinspected the following morning in the daylight. No containers were found. After the 1986 detonation, the soils in and surrounding the pit were surveyed with an organic photoionizer (with an 11.2 eV probe) to determine if there were any residual volatile organics. There were no readings above background.

Onsite personnel observed that the weather conditions during November of 1984 were approximately 45°F, winds less than 15 miles per hour, and clear. The weather conditions during the June 1986 detonation were approximately 95°F, winds 10 miles per hour, and clear (WHC 1993c). The surface soils were dry at the time of the detonation events.

This page intentionally left blank.

CONTENTS

APPENDIX

TABLES

This page intentionally left blank.

4.0 WASTE CHARACTERISTICS

This chapter addresses the waste inventory and waste treated at the Ash Pit Demolition Site.

4.1 ESTIMATE OF MAXIMUM INVENTORY OF WASTE

The Ash Pit Demolition Site was a two-time use site. The demolition activities were limited to two detonation events in 1984 and 1986; hence, waste was never stored at the Ash Pit Demolition Site. The known inventory of chemicals that were detonated is listed in Table 4-1. The maximum inventory is the sum of those chemical quantities expressed in Table 4-1. The known inventory of products used to initiate detonation activities are listed in Table 4-2. A list of Hanford Sitewide Soil Background levels and MTCA cleanup values are located in Appendix 4A.

4.2 WASTE TREATED AT THE ASH PIT DEMOLITION SITE

All waste treated at the Ash Pit Demolition Site is designated in the Part A, Form 3. The chemical waste treated at the Ash Pit Demolition Site was assumed to be reactive or explosive at the time of treatment. All chemicals detonated were commercial products from onsite laboratories or process areas that were excess to needs or were beyond their designated shelf life.

This page intentionally left blank.

Table 4-1. Inventory of Known Discarded Explosive Chemical Products Detonated at the 200 West Area Ash Pit Demolition Site. (sheet 1 of 2)

Demolition Date	Analyte	C.A.S. Number (a,e)	Quantity (kg)	Vapor pressure 20 °C mm Hg (e)	MTCA Method B (mg/kg) unless noted (d)	Sitewide Bkgrd (mg/kg) (DOE-RL 1993)
Nov-84	Benzene	71-43-2	9.47	75	34 (b)	NA
	bis(2-chlorethoxy) ethane	112-26-5	3.28	0.1	NA	NA
	Bromobenzene	108-86-1	17.29	5.0 @ 27.8 °C	NA	NA
	2-butoxyethanol	111-76-2	3.28	0.76	NA	NA
	Cyclohexane	110-82-7	3.61	95	NA	NA
	di-isopropyl benzene	577-55-9	6.61	No data	NA	NA
	1, 4 dioxane	123-91-1	4.69	27	91 (b)	NA
	Ethylene glycol monoethyl ether	110-80-5	1.05	3.8	NA	NA
	Glycerin	56-81-5	7.52	.0025 @ 50 °C	NA	NA
	Naphtha	8030-30-6	1.17	40	NA	NA
	Nitromethane	75-52-5	3.94	27.8	NA	NA
	Tetrahydrofuran	109-99-9	15.79	145	NA	NA
	Tetrahydronaphthalene	119-64-2	6.58	1.0 @ 38 °C	NA	NA
Jun-86	Acrolein	107-02-8	0.4	220	NA	NA
	Aluminum chloride*	7446-70-0	0.45	1.0 @ 100 °C	NA	NA
	2-butoxethanol	111-76-2	0.95	0.76	NA	NA
	Chromium metal powder	7440-47-3	0.45	1.0 @ 1616 °C	80000 (c)	320
	Dimethyl hydrazine	57-14-7	0.01	157 @ 25 °C	0.38 (b)	NA
	Ethyl ether	60-29-7	28	442	16000	NA
	Hydrazine	302-01-2	1	10.4	0.33 (b)	NA
	Isopropyl ether	108-20-3	1	130	NA	NA
	Lithium hydride*	7580-67-8	0.23	0	NA	NA
	p-nitrobenzoyl chloride*	122-04-3	0.1	Negligible	NA	NA
	Phenyl ether*	101-84-8	0.24	.02 @ 25 °C	NA	NA
	Picric acid*	88-89-1	0.2	1	NA	NA
	Picryl chloride*	88-88-0	0.3	No data	NA	NA
	Sodium peroxide*	1313-60-6	0.34	No data	NA	NA
	Tetrahydrofuran	109-99-9	6.1	145	NA	NA
	Triethylborane in hexane	97-94-9	0.5	No data	NA	NA

THIS PAGE INTENTIONALLY
LEFT BLANK

Table 4-1. Inventory of Known Discarded Explosive Chemical Products Detonated at the 200 West Area Ash Pit Demolition Site. (sheet 2 of 2)

Demolition Date	Analyte Percentage	C.A.S. Number (a,e)	Quantity (kg)	Vapor pressure 20 °C mm Hg (e)	MTCA Method B (mg/kg) unless noted (d)	Sitewide Bkgrd (mg/kg) (DOE-RL 1993)
Jun-86	Mixture of		Total = 5.0			
	Benzene (20%)	71-43-2		75	34 (b)	NA
	Ethyl Acetate (20%)	141-78-6		73	72000	NA
	Ethyl ether (10%)	60-29-7		442	16000	NA
	Hydrogen sulfide (1.0%)	7783-06-4		15200 @ 25 °C	240	NA
	Methanol (29%)	67-56-1		97.25	40000	NA
	Tetrahydrofuran (10%)	109-99-9		145	NA	NA
	Toluene (10%)	108-88-3		22	16000	NA
Jun-86	Mixture of;		Total = 4.0			
	Benzene	71-43-2		75	34 (b)	NA
	Ethyl acetate	141-78-6		73	72000	NA
	Ethyl ether	60-29-7		442	16000	NA
	Petroleum ether	8032-32-4		No data	NA	NA
	Toluene	108-88-3		22	16000	NA
Jun-86	Mixture of;		Total = 4.0			
	di-Ethyl ether (50%)	60-29-7		442	NA	NA
	Heptane (50%)	142-82-5		40	NA	NA
Jun-86	Mixture of;		Total = 4.0		NA	NA
	Allyl magnesium bromide (22%)	1730-25-2		No data		
	Ethyl ether (78%)	60-29-7		442	16000	NA
Jun-86	Mixture of;		Total = 1.0	75	34 (b)	NA
	Benzene	71-43-2				
	Butyllithium	109-72-8		No data	NA	NA
	Hexane	110-54-3		124	4800	NA
	tetrahydrofuran	109-99-9		145	NA	NA

Notes
*denotes materials that are solid under standard conditions, other materials listed are liquid under standard conditions.
(a)C.A.S. - Chemical Abstract System Registry Numbers, Chemical Abstract Service is a division of the American Chemical Society.
(b)MTCA Method B cancer cleanup level.
(c)MTCA Method B non-cancer cleanup level for chromium III.
(d)MTCA Method B non-cancer cleanup level unless noted otherwise.
(e)Information adapted from Aldrich (1986) and Merck (1989).
NA = Not available

THIS PAGE INTENTIONALLY
LEFT BLANK

Table 4-2. Inventory of Known Detonation Materials for 200 West Area Ash Pit Demolition Site.

Demolition Date	Materials	CAS number (a)	MTCA method B (mg/kg) (c)	Sitewide Bkgrd (mg/kg) (DOE-RL 1993)
Nov-84	Aluminum powder*	7440-90-5	80000	28800
Jun-86	Ammonium nitrate*/ fuel oil	6484-52-2	570000 (b) NA	906 (b) NA
Nov-84, Jun-86	Nitroglycerin dynamite*	55-63-0	NA	NA
Jun-86	Unleaded gasoline		NA	NA
Nov-84, Jun-86	Pentaerythrite tetranitrate*	78-11-5	NA	NA

Notes
*denotes materials that are solid under standard conditions, other materials listed are liquid under standard conditions.
(a)C.A.S. - Chemical Abstract system Registry Numbers, Chemical Abstract Service is a division of the American Chemical Society.
(b)MTCA Method B non-cancer clean up level for nitrate.
(c)MTCA Method B non-cancer cleanup level unless noted otherwise.
NA = Not available

THIS PAGE INTENTIONALLY
LEFT BLANK

CONTENTS

This page intentionally left blank.

5.0 GROUNDWATER MONITORING

It is unlikely that the discarded explosive chemical products interacted with groundwater because (1) rainfall at the Hanford Site is slight [average annual rainfall is 6.26 inches (.159 meters) per year] (PNL 1993), thus limiting contaminant migration; (2) depth from soil surface to groundwater is 250 to 260 feet (76.25 to 79.30 meters) (WHC 1993b); and (3) it is believed that all significant quantities of chemical products were destroyed in the explosion or volatilized to the atmosphere.

The Ash Pit Demolition Site is not subject to the groundwater monitoring requirements of WAC 173-303-610 (7)(a) if there is no waste left in place, as is consistent with the preferred closure strategy (Chapter 6.0). The Ash Pit Demolition Site will not be operated, and has not been operated, as a dangerous waste surface impoundment, waste pile, land treatment unit, or landfill as defined in WAC 173-303-645(1)(a). Therefore, if clean closure can be attained, groundwater monitoring will not be required.

However, if any groundwater remedial action is required with respect to contaminants associated with the Ash Pit Demolition Site, it will be addressed through the CERCLA remedial investigation/feasibility study process, under 200-UP-1 groundwater operable unit.

This page intentionally left blank.

CONTENTS

FIGURE

This page intentionally left blank.

6.0 CLOSURE STRATEGY AND PERFORMANCE STANDARDS

This chapter describes the closure strategy, closure performance standards, and closure activities.

6.1 CLOSURE STRATEGY

The closure investigation began by performing a radiation survey at the Ash Pit Demolition Site. The results of the radiation survey confirmed that there is no radioactivity above background at the Ash Pit Demolition Site. Any radiation above background levels at the Ash Pit Demolition Site would have been from activities other than Ash Pit Demolition Site activities.

Soil samples have been taken in and adjacent to the Ash Pit Demolition Site and are currently being analyzed as specified in the Sampling and Analysis Plan (SAP) (Appendix 7C). To meet the criteria for clean closure of the Ash Pit Demolition Site, soil analytical results must verify that potentially dangerous waste constituents treated at the site are not present above action levels. The analytical results will be evaluated and compared with action levels to verify that the concentration of all detonation activity residues are at or below action levels. The constituents of concern and the analytical methods were agreed upon through the Data Quality Objectives (DQO) process by taking into account the waste inventory, reactive byproducts, chemical degradation, and detonation material. The analytical methods are listed in the SAP, Appendix 7C. If at any time an imminent hazard is posed at the Ash Pit Demolition Site, an emergency response will occur to ensure worker safety.

Action levels are defined as levels above the Hanford Site soil background levels (DOE-RL 1993) and MTCA (WAC 173-340) Method B. If analysis determines that levels are above both guidelines, a phase two investigation will be developed. This is not anticipated, however, because of the detonation efficiency and the ability of the soil system to breakdown and eliminate many organic chemicals through abiotic (e.g., volatilization, hydrolysis, oxidation, reduction, photo-degradation) and biotic (e.g., metabolically active microorganisms, extracellular enzymes, or metabolic intermediates) degradation (Dragun 1988).

For noncarcinogens, the principal variable relating human health to action levels is the oral reference dose. The oral reference dose is defined as the level of daily human exposure at or below which no adverse effect is expected to occur during a lifetime. For carcinogens, the cancer slope factor is the basis for determining human health effects; it is a measurement of risk per unit dose. The oral reference dose and cancer slope factor are chemical specific and are obtained from the *Integrated Risk Information System* (EPA 1991), and other health-based EPA-approved databases, which are updated periodically by the EPA (see Appendix 4A for listing of specific health-based information sources). *Model Toxics Control Act* Method B action levels will be based on values that are current at the time of approval of this closure plan.

The closure strategy for the Ash Pit Demolition Site is depicted in a flow diagram in Figure 6-1.

6.2 CLOSURE PERFORMANCE STANDARDS

The closure performance standards in WAC 173-303-610(2)(a) require the owner or operator to close the TSD unit in a manner that:

"(a)(i) Minimizes the need for further maintenance;

(ii) Controls, minimizes or eliminates to the extent necessary to protect human health and the environment, postclosure escape of dangerous waste, dangerous constituents, leachate, contaminated run-off, or dangerous waste decomposition products to the ground, surface water, ground water, or the atmosphere; and

(iii) 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."

6.2.1 Minimize the Need for Future Maintenance

The closure performance standard in WAC 173-303-610(2)(a)(i) requires the owner or operator of a TSD unit to close the site in a manner that minimizes the need for further maintenance. As discussed in Section 6.1, the strategy proposed for closure (i.e., that the site is clean by demonstration that the contaminants are below action levels or by waste removal) will minimize the need for future maintenance.

6.2.2 Protect Human Health and the Environment

The Ash Pit Demolition Site is to be clean closed. Consistent with this intent and strategy, the following actions will be/or have been taken (as necessary) in advance of closure certification.

- The closure area was radiologically surveyed (Completed 5/92).
- Surface soils were sampled for dangerous waste constituents (Completed 6/94).
- Data will be evaluated to determine if constituents of concern are present above action levels and the extent of contamination, if any.
- If contaminated soil is found, options include soil removal to reduce constituent concentrations in site surface soils to acceptable soil cleanup values as determined by methods prescribed in WAC 173-340.

6.2.3 Return Land to the Appearance and Use of Surrounding Land

In accordance with WAC 173-303-610(2)(a)(iii), the owner or operator of a TSD unit is required to close the unit 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.

When closure of the Ash Pit Demolition Site is accomplished, the site will be returned to the appearance and continued use of the surrounding 200 West Area Ash Pit.

6.3 OVERVIEW OF CLOSURE ACTIVITIES

The activities presented in this section are divided into planning activities and physical activities.

6.3.1 Planning Activities

The DQO planning process was used to ensure that the performance standards are met to the satisfaction of all parties involved. This DQO process provided the framework for the SAP and defined the data needs and uses. The SAP provides the documentation of agreement and decisions regarding establishing and meeting the action levels for the Ash Pit Demolition Site closure (Appendix 7C.)

6.3.2 Physical Activities

The general closure activities are as follows.

- Perform radiological survey (Completed 5/92).
- Collect soiled samples from within the Ash Pit Demolition Site. Sample locations and collection methods are discussed in Chapter 7.0, Section 7.2.3, and SAP (Appendix 7C) (Completed 6/94).
- Analyze samples in accordance with EPA-approved procedures and evaluate results. Samples will be analyzed in an offsite laboratory capable of performing to EPA Analytical level III standards.
- Compare analytical results to action levels to determine the extent of contamination and to determine the presence or absence of contaminants.
- If contamination levels for all constituents of concern are below their action levels, the Ash Pit Demolition Site will be clean closed.
- If contamination at the Ash Pit Demolition Site is above the action level, a phase two investigation will be developed. A phase two investigation may include one of the following actions. (The action

level for the Ash Pit Demolition Site is when contamination is above both background concentrations and health-based standards.)

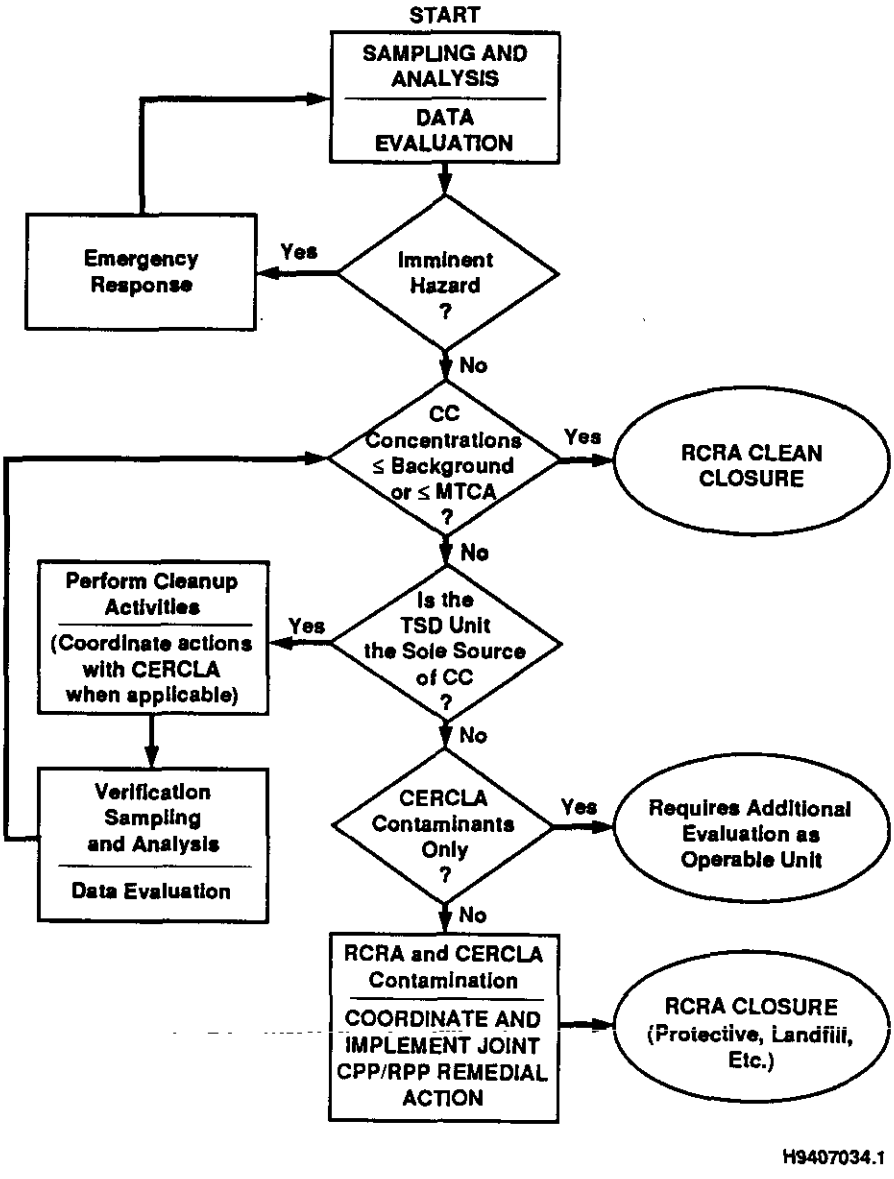
- If the contamination is from Ash Pit Demolition Site activities only, soil will be treated and/or disposed in a RCRA-compliant landfill.

- If the soil is contaminated with dangerous waste constituents from other sources in addition to Ash Pit Demolition Site activities, the soil will be remediated in coordination with CERCLA activities for the 200-SS-2 operable unit.

- If the soil is contaminated from sources other than Ash Pit Demolition Site activities, the site will no longer be a RCRA site, and remediation will occur under CERCLA as part of 200-SS-2 operable unit.

All equipment used in performing closure activities will be decontaminated or disposed at a RCRA-compliant facility.

Closure activities will be monitored by an independent registered professional engineer who will certify that closure activities are accomplished in accordance with the specifications of the approved closure plan.



Background = Hanford Site-wide background threshold (upper limit range of concentrations) for soil (DOE-RL 1992b).
CC = Constituents of concern
Clean Closure = Closure based on the criterion that dangerous waste is not present in concentrations greater than background or LOQ; no further remedial action to be taken.
CPP/RPP = CERCLA past practice/RCRA past practice.
MTCA = Model Toxic Control Act (WAC 173-340) Method B.
Verification Sampling = Sampling and analysis used to evaluate the success of contamination removal.

Figure 6-1. Closure Strategy Flowchart.

THIS PAGE INTENTIONALLY
LEFT BLANK

CONTENTS

APPENDICES

This page intentionally left blank.

7.0 CLOSURE ACTIVITIES

This chapter describes the proposed closure activities for the Ash Pit Demolition Site. In conformance with Chapter 6.0, this chapter provides specific field sampling and laboratory analytical methods that will be applied to identify soil contamination originating at the Ash Pit Demolition Site. When validated, the analytical results will be used to determine the appropriate closure strategy (as presented in Chapter 6.0 and illustrated in Figure 6-1). The SAP has been developed from process information (Chapter 3.0), the waste inventory (Chapter 4.0), the closure strategy (Chapter 6.0), and the DQO process. Appendix 7A contains the quality assurance project plan for the SAP. Appendix 7C contains the SAP.

7.1 SITE RADIOLOGICAL SURVEY

A radiological survey of the Ash Pit Demolition Site was performed to confirm that the site is substantially free of radiological contaminants. Radiological activity in surface soils is below levels requiring management of the area as a radiologically contaminated site, control of work at the site by the radiation work permit process, or wearing of prescribed protective clothing and/or respiratory protection. The radiological survey was conducted following the procedures contained in the *Health Physics Procedures Manual* (WHC 1990c).

7.2 SOIL SAMPLING AND ANALYSIS CRITERIA

Soil samples were collected and are currently being analyzed using level III analytical services procured from an offsite contracted laboratory. If contaminants are present at levels in excess of proposed action levels, the data obtained from soil sampling and analysis will provide information for devising and implementing appropriate remedial action.

7.2.1 Sampling and Data Quality Objectives

To create a suitable soil sampling and analysis scheme, it is necessary to have a general understanding of explosives and detonations. An explosive is a chemical or a mixture of chemicals that is capable of producing an explosion (i.e., detonation) through the liberation of stored energy. All explosive substances produce heat; nearly all of them produce gas (Davis 1943). Explosives are classified into low explosives (or propellants), primary explosives (or initiators), and high explosives. Low explosives are combustible materials, which always include an oxidizer component, such that combustion is supportable whether or not air is present. Low explosives burn but do not explode. Instead, rapid accumulation of the gas products of combustion in a confined space is the actual cause of the explosion. Primary and high explosives actually undergo an instantaneous chemical transformation when detonation is initiated, which liberates large quantities of heat or heat and gas, thus producing an explosion. Detonation is distinct from combustion.

By themselves, many primary and high explosives will not support combustion. Primary explosives are sensitive to both heat and shock. High explosives generally exhibit sensitivity to shock only, and generally must receive a relatively strong shock, as from a primary explosive, to detonate. Primary and high explosives are characterized by a property termed brisance, referring to the production of a shock wave during detonation, due to the characteristically high propagation velocities involved.

Chemical products that were identified as candidates for demolition at the Ash Pit Demolition Site included strong oxidizers and reducing agents (i.e., low explosives when combined), chemicals such as ethers and furans that are highly flammable and form shock-sensitive degradation products, and chemical compounds that were recognized as primary or high explosives or chemical cognates of such explosives.

The Ash Pit Demolition Site demolition events could be characterized as follows.

- Initiation by a primary explosive, resulting in propagation of a shock wave through the mass of chemical containers. The shock wave would have caused any other primary or high explosive chemicals to detonate.

- Nonexplosive chemicals would be dispersed (in the case of solids) or atomized (in the case of liquids), directed upward (the only unconfined direction) by the partial confinement of the shallow pit, and ignited by the heat released by the explosion, causing the fireball. The explosion also could have had the effect of fragmenting some of the chemicals that were present.

- The shock wave from the explosion and the expanding gases from the fireball would have caused unreacted residues (if any) to be dispersed over an unspecified area.

In the intervening time since the most recent demolition event took place, volatile organic residues in the soil have been lost to the atmosphere by vaporization. Unreacted volatiles and semivolatiles may have been broken down and eliminated from the soil column, all or in part, by abiotic (e.g., volatilization, photo-degradation) and biotic (e.g., microbial activity) degradation (Dragun 1988).

The primary objective of soil sampling will be to determine whether dangerous waste contaminants are present in surface soils at the Ash Pit Demolition Site at levels exceeding the proposed action levels. Contaminants (i.e., constituents of concern) can be selected based on the inventory constituent list for the Ash Pit Demolition Site. Analytical methods are required that provide the capabilities to identify and quantify these constituents if the constituents are present in the soil.

If dangerous waste constituents are present above proposed action levels, a second objective of sampling will be to determine the extent and areal distribution of contamination. The efficiency of thermal destruction during

the demolition events is not directly assessable at this late date. Any chemical constituents that were not effectively destroyed in the explosion might simply have been dispersed across the detonation site. Recognizing this possibility, the sampling scheme has been designed to obtain data that will support an assessment regarding the adequacy of existing Ash Pit Demolition Site closure area dimensions.

It is generally acknowledged that detonation and thermal destruction are very efficient processes, and that any dangerous waste constituents that might remain in the soil at the closure area probably would exist at very low concentrations, such that detection might be difficult. Therefore, a sufficiently conservative EPA analytical support level (level III) will be invoked during analysis to minimize concerns that dangerous waste concentrations above the proposed action levels could go undetected.

Data quality objectives are developed to describe the overall level of uncertainty in environmental data that decision-makers are willing to accept. Typically, data quality requirements are specified in terms of objectives for precision, accuracy, representativeness, comparability, and completeness. Project-specific DQOs for Ash Pit Demolition Site soil sampling and analysis activities are identified in Appendix 7A and the SAP (Appendix 7C).

7.2.2 Analytical Parameters

As indicated in Chapter 4:0, Table 4-1, the detonation events at the Ash Pit Demolition Site included a variety of organic and inorganic constituents that are (or are suspected to be) characteristic ignitable, corrosive, and/or reactive waste as defined in WAC 173-303-090. The majority of the chemical compounds were of two general types: (1) organic chemicals that form unstable degradation products (e.g., ethers and furans that produce shock-sensitive peroxides); and (2) reactive powdered metals and metal salts. The analytical methods chosen through the DQO process were based on these constituents of concern, which are listed in Section 6.0 of the SAP (Appendix 7C).

7.2.3 Sampling Methodology

The following sections discuss sample locations, background samples, and analytical instrumentation and procedures.

7.2.3.1 Sample Locations. The blasting pit was reconstructed by removing windblown sand to create a 1-foot (0.305 meter)-deep, 3-foot (0.915 meter)-diameter hole at the center of the site. Ten soil samples were taken from the

9 locations indicated in the SAP, Appendix 7C. The numbers and types of samples to be collected and submitted for analysis consisted of the following.

- Two authoritative soil samples were collected at the site center. One sample will be collected at a depth of 0 to 6 inches (0 to 0.15 meter) and one sample at a depth of 12 to 18 inches (0.305 to 0.476 meter).

- Three soil samples were collected from predetermined random locations within a 1.5 foot (0.458 meter) radius of the site center.

- Four soil samples were collected from each quadrant at a distance of about 3 feet (0.915 meter) from the center of the site.

- One soil sample was collected downwind of the site at a distance of 6 feet (1.83 meters) from the center of the site.

- One soil sample was split in the field, placed in separate containers, and submitted for quality assurance and quality control purposes.

- Two blanks, consisting of an equipment blank and a trip blank, were collected and submitted for analysis with the soil samples and splits. Blanks consisted of silica sand.

Soil samples were removed from the specified locations for qualitative and quantitative analyses by an offsite contracted laboratory. Sampling was performed in conformance with EII 5.2, Appendix E (WHC 1988a). Samples were collected manually, using decontaminated, stainless steel hand tools. Specific soil sample locations and depths are found in the SAP (Appendix 7C).

All soil samples (including blanks and duplicates) had preassigned sample numbers in conformance with EII 5.10, "Obtaining Sample Identification Numbers and Accessing Hanford Environmental Information System (HEIS) Data" (WHC 1988a). The sample volume required for each soil sample was determined by the analytical laboratory. The samples were chilled with ice in the field. Samples were temporarily refrigerated and then transported to the analytical laboratory in an ice chest.

7.2.3.2 Background Samples. A Hanford Site-wide assessment of natural constituent background levels has been performed for the Hanford Site (WHC 1991a; WHC 1991b). The majority of dangerous waste constituents detonated at the site were organic chemicals for which background values are unavailable. For these constituents, concentration data will be compared to MTCA Method B levels. A few compounds on the waste inventory list contained inorganic metal and halide elements. Residues from these compounds could include oxides, cations, and/or various anions with non-zero background values. Results from the Hanford Site-wide assessment will be available for use in data interpretation. The adequacy of available Hanford Site-wide background data for site-specific contaminants will be evaluated in conjunction with the interpretation of analytical results.

7.2.4 Field Documentation

The field team leader maintained a logbook during soil sampling activities in accordance with EII 1.5, "Field Logbooks" (WHC 1988a). Information pertinent to ongoing activities at the closure area were recorded in a legible manner with indelible ink in the logbook.

7.2.5 Evaluation of Data

Data reliability will be evaluated through a review of field documentation, sample handling procedures, analytical procedures, offsite contracted laboratory documentation, and calibration records. The purpose of the review will be to establish the reliability of the data by verifying that samples were labeled, handled, and controlled in a manner designed to minimize the possibility of physical misidentification. Procedures for quality control documentation will follow SW-846, Chapter 1, "Quality Assurance" (EPA 1990). Analytical data returned from the contract laboratory will be validated according to requirements described in *Data Validation Procedures for Chemical Analyses* (WHC 1993a).

7.2.6 Statistical Evaluation

Analytical results will be reviewed and summarized. Procedures for calculating detection and quantitation limits of constituents and for reporting of data will follow the guidance in EPA SW-846, Chapter 1, "Quality Assurance" (EPA 1990) and *Characterization and Use of Soil and Groundwater Background for the Hanford Site* (WHC 1991a). Constituents will be eliminated from further consideration in cases where all results are below detection limits (provided the detection limit is below background). For the remaining constituents, data will be tabulated for statistical evaluation. Summary statistics will be computed. The following information for individual constituents will be summarized for presentation:

- Total number of values
- Number of values less than detection limits
- Minimum value
- Maximum value
- Median
- Mean
- Standard deviation
- Coefficient of variation.

Data analysis and evaluation procedures will be used that: (1) balance the false positive and false negative error rates; (2) are appropriate for the distribution of sample data for each analyte; and (3) are consistent with the nature of the data (e.g., the proportion of 'non-detects' in the data sets) and the applicable regulatory limits (background values or health-based standards). Appropriate statistical methods might include (but would not be limited to) tests on means, percentiles, and/or proportions.

7.2.7 Determination of Action Levels

Soil cleanup action levels were developed from Hanford Site background threshold values (DOE-RL 1993) and MTCA Method B (WAC 173-340). Action levels were determined for all constituents of concern during the DQO process (see SAP, Appendix 7C). Constituent levels will be compared against action levels to assess the need for remedial action. If a determination is made that remedial action will be necessary as a condition of closure, a remedial action plan will be prepared.

7.3 REMOVAL OF CONTAMINATED SOIL

If soil analytical results and assessments of remedial options should indicate that soil removal is necessary to close the Ash Pit Demolition Site, this section of the closure plan will be implemented as indicated in Chapter 6.0, Figure 6-1. This section describes the following activities relating to soil removal:

- Estimating the volume of contaminated soil to be removed
- Soil removal survey control
- Soil removal operations
- Verification sampling.

7.3.1 Estimating the Volume of Contaminated Soil to be Removed

The volume of contaminated soil will be determined based on soil analytical results (i.e., the indicated constituents and their respective concentrations and distributions) and the constituent-specific action levels (i.e., soil cleanup values). The volume of contaminated soil will be calculated in the following manner.

- Soil sample information will be plotted on a closure area plan drawing.

- For each contaminated area, the volume of soil to be removed will be estimated by the results obtained in the initial characterization.

- A phase two investigation will be proposed to define the location of the soil constituents of concern. The location of the site contamination must be known with some degree of certainty to begin any soil excavation. Supplemental sampling with portable field screening instrumentation might be carried out to better define the areal extent of contamination.

7.3.2 Soil Removal Survey Control

The surveyed corner monuments installed at the site will serve as control points for any soil removal excavation work. The monuments also provided location control for the surface radiological survey and soil sampling

activities. If removal of contaminated soil is necessary for clean closure of the site, additional control points may be installed as needed to effectively manage and document the excavation work. As preliminary actions, a survey grid will be projected over the area to be excavated, and a controlled drawing of the existing site topography will be prepared identifying all control point positions and soil sample locations. Depending upon the size and shape of the excavation area, elevation surveys and grade stakes will be used (as appropriate) to control the work. The controlled drawing will be modified to show the extent of soil removed and the final site surface configuration. Afterward, the survey grid and the drawing(s) will assist in location control and documentation for verification sampling.

7.3.3 Soil Removal Operations

If soil removal is necessary and if the contaminated soil volume is sufficient, the soil removal operation will be performed using standard types of earth moving equipment (e.g., grader, front-end loader, backhoe, and rear dump trucks). Excavation will be performed with either a backhoe or a front-end loader. Dust suppression would be employed, if needed, to minimize dust generation and potential releases of contaminants (e.g., a water truck could apply water periodically to the excavation area and adjacent affected areas). Dust control activities will be repeated as necessary to maintain the soil in a condition sufficient to minimize or eliminate dust production.

If the contaminated soil volume is small, 55-gallon (208-liter) containers will be used. Alternatively, soil could be bulk loaded into rear dump trucks. Contaminated soil (containerized or bulk loaded) will be transported to a permitted disposal facility. Contaminated soil will be prepared for shipment (i.e., labeled, marked, and placarded) as required in WAC 173-303-190, which incorporates by reference the applicable federal regulations on hazardous waste shipments (49 CFR 172, 173, 178, and 179). An EPA hazardous waste manifest will be prepared to document each offsite shipment of contaminated soil as required in WAC 173-303-180 and 40 CFR 262.

If soil removal is necessary, the affected area will be recontoured with surrounding soils. After excavation and before recontouring of the removal areas, the affected area will undergo verification sampling (Chapter 6.0, Figure 6-1).

All equipment used in performing closure activities will be decontaminated or disposed at a RCRA compliant facility.

As appropriate, the destination of any removed soil will be identified in the Administrative Record for the Ash Pit Demolition Site. This identification will be undertaken concurrently with the closure certification (Section 7.7).

7.3.4 Verification Sampling

Verification sampling will be performed following soil removal to establish that residual concentrations of the constituents of concern are below action levels (i.e., the objective of soil removal has been attained). Verification samples will be taken from the newly exposed surface area resulting from soil removal. Verification samples will be analyzed in an offsite contracted laboratory. The scope of sample analysis will be limited to quantifying the residual concentrations of constituents of concern to compare these concentration values to the cleanup standards. Before verification sampling, the number and location of the samples and the analytical methods will be submitted for regulatory concurrence. It is envisioned that verification samples will be analyzed by the same procedures identified in Section 7.2.2.

7.4 PERSONNEL TRAINING

Appendix 7B contains a brief description of the training courses required for onsite personnel. Training for soil sampling personnel is covered within the EIIs. All personnel entering the TSD unit during closure must have 40 hours of hazardous waste training as defined in 29 CFR 1910.120. Before performing actual closure activities, specific work plans will be submitted to the lead regulatory agency for review. These documents will detail the specific work activities and will not be written until the latest technology and specific materials and equipment are known.

7.5 SCHEDULE FOR CLOSURE

Closure of the Ash Pit Demolition Site will begin on notification by Ecology of plan approval. Closure will proceed according to the schedule presented in Figure 7-1.

7.6 CLOSURE CONTACTS

The following office (or its successor) is the official contact for the Ash Pit Demolition Site closure plan:

Office of Environmental Assurance,
Permits, and Policy
U.S. Department of Energy,
Richland Operations Office
P.O. Box 550
Richland, Washington 99352
(509) 376-5441

7.7 AMENDMENT OF CLOSURE PLAN

The closure plan for the Ash Pit Demolition Site will be amended whenever changes in operating plans or unit design affect the closure plan; whenever there is a change in the expected year of closure; or if, when conducting closure activities, unexpected events require a modification of the closure plan. The closure plan will be modified in accordance with WAC 173-303-610. This plan may be amended any time before certification of final closure of the Ash Pit Demolition Site.

If an amendment to the approved closure plan is required, the DOE-RL will submit a written request to the lead regulatory agency to authorize a change to the approved plan. The written request will include a copy of the closure plan amendment for approval.

7.8 CERTIFICATION OF CLOSURE AND SURVEY PLAT

Within 60 days of closure of the Ash Pit Demolition Site, the DOE-RL will submit to the Benton County Auditor and the lead regulatory agency a certification of closure and a duly certified survey plat. The certification of closure will be signed by both the DOE-RL and a registered independent professional engineer, stating that the unit has been closed in accordance with the approved closure plan. The certification will be submitted by registered mail or an equivalent delivery service. Documentation supporting the independent registered professional engineer's certification will be supplied upon request of the regulatory authority.

The DOE-RL and the independent professional engineer will certify with a document similar to Figure 7-2.

This page intentionally left blank.

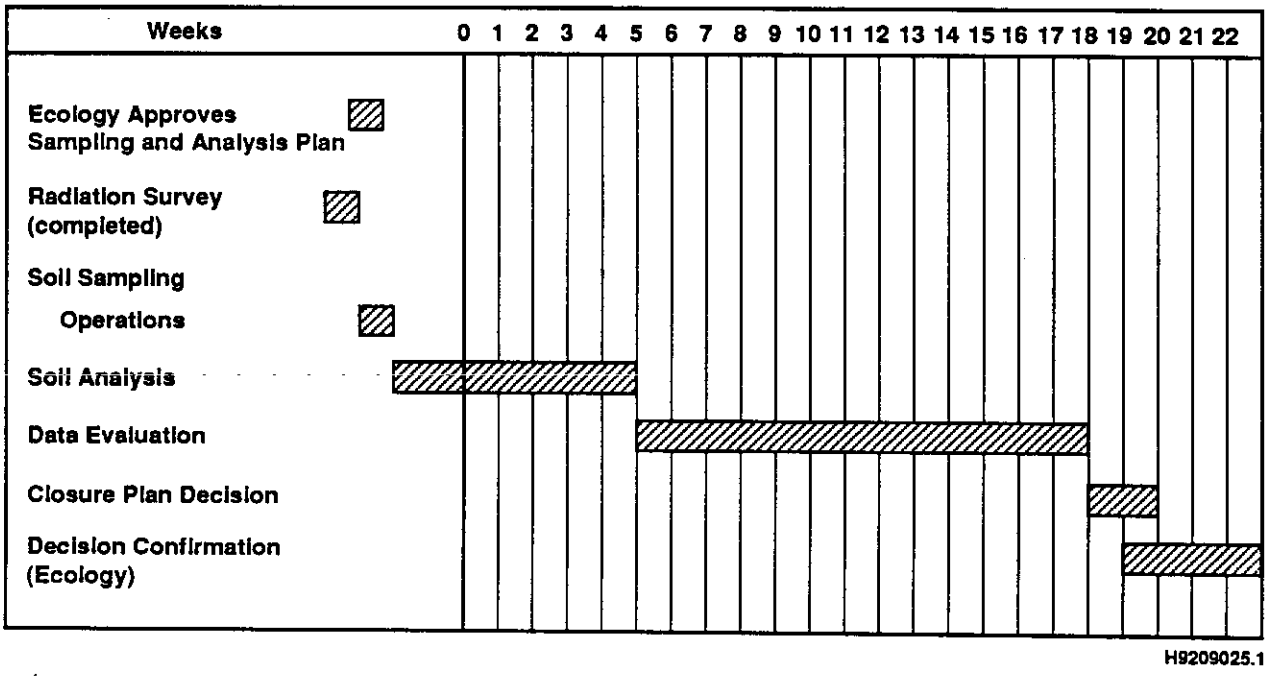


Figure 7-1. 200 West Area Ash Pit Demolition Site Closure Schedule.

THIS PAGE INTENTIONALLY
LEFT BLANK

CLOSURE CERTIFICATION
FOR

_____

Hanford Site
U.S. Department of Energy, Richland Field Office

We, the undersigned, hereby certify that all _____ _____ closure activities were performed in accordance with the specifications in the approved closure plan.

_____ _____
Owner/Operator Signature DOE-RL Representative Date
(Typed Name)

_____ P.E.# _____ State ___ _____
Signature Independent Registered Professional Engineer Date
(Typed Name, Professional Engineer license number, state of issuance, and date of signature)

Figure 7-2. Typical Closure Certification Document.

THIS PAGE INTENTIONALLY
LEFT BLANK

CONTENTS

This page intentionally left blank.

8.0 POSTCLOSURE PLAN

In the event that the Ash Pit Demolition Site cannot be clean closed and that residual soil contamination remains after soil removal activities, a Ash Pit Demolition Site postclosure permit application will be submitted in accordance with WAC 173-303 regulations.

8.1 NOTICE IN DEED

This closure plan proposes that the Ash Pit Demolition Site be closed with no residual soil contamination that would pose a threat to human health or the environment. However, if clean closure cannot be secured, the following action will be taken in accordance with WAC 173-303-610(1)(b). Within 60 days of the certification of closure, the DOE-RL will complete, sign, notarize, and file for recording the notice indicated below. The notice will be sent to the Auditor of Benton County, P.O. Box 470, Prosser, Washington, with instructions to record this notice in the General Index.

TO WHOM IT MAY CONCERN

The United States Department of Energy, Richland Operations Office, an operations office of the United States Department of Energy, which is a department of the United States Government, the undersigned, whose local address is the Federal Building, 825 Jadwin Avenue, Richland, Washington, hereby gives the following notice as required by 40 CFR 265.120 and WAC 173-303-610(10) (whichever is applicable):

(a) The United States of America is, and since April 1943, has been in possession in fee simple of the following described lands: (legal description of the Ash Pit Demolition Site)

(b) The United States Department of Energy, Richland Operations Office, by operation of the Ash Pit Demolition Site, has disposed hazardous and/or dangerous waste under other terms of regulations promulgated by the United States Environmental Protection Agency and the Washington State Department of Ecology (whichever is applicable) at the above described land

(c) The future use of the above described land is restricted under terms of 40 CFR 264.117(c) and WAC 173-303-610(7)(d) (whichever is applicable)

(d) Any and all future purchasers of this land should inform themselves of the requirements of the regulations and ascertain the amount and nature of waste disposed on the above property

(e) The United States Department of Energy, Richland Operations Office, has filed a survey plat with the Benton County Planning Department and with the United States Environmental Protection Agency, Region 10, and the Washington State Department of Ecology (whichever are

applicable) showing the location and dimensions of the Ash Pit Demolition Site and a record of the type, location, and quantity of waste treated.

8.2 POSTCLOSURE CARE

Postclosure care is required when a TSD unit has residual contamination that poses a problem to human health or the environment. At the Ash Pit Demolition Site, underlying soils and possibly groundwater might have been contaminated by waste treated during Ash Pit Demolition Site operations. Under the Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement), source contamination and groundwater operable units will be investigated and remediated under the CERCLA process.

As described in Chapter 6.0, soil remediation may be coordinated with the CERCLA remedial investigation/feasibility study process. If the soil is contaminated from Ash Pit Demolition Site detonation activities, the TSD unit will not be considered closed until the remediation is complete. Closure remediation activities may be completed when the larger-scale cleanup is implemented. The Ash Pit Demolition Site will be inspected until CERCLA remediation activities begin at the site. This inspection would be combined with TSD unit inspections presently conducted. The inspections would determine the need for maintenance of any temporary covers or other physical barriers and to check the security of the site. Any required maintenance would be performed by Hanford Site personnel.

Any data obtained from sampling and analyses during RCRA closure activities will be part of the official record and included with the closure plan. These data will be available for the CERCLA evaluation of the 200-SS-2 (source) and 200-UP-1 (groundwater) operable units.

CONTENTS

This page intentionally left blank.

9.0 REFERENCES

9.1 DOCUMENTS

Aldrich, 1986, *Aldrich Fine Chemicals*, Aldrich Chemical Company, Inc., Milwaukee, Wisconsin.

Davis, T. L., 1943, *The Chemistry of Powder and Explosives*, Angriff Press, Hollywood, California.

DOE, 1987, *Final Environmental Impact Statement: Disposal of Hanford Defense High-Level, Transuranic and Tank Wastes*, Vol. 1-5, DOE/EIS-0113, U.S. Department of Energy, Washington, D.C.

DOE-RL, 1988, *Hanford Facility Dangerous Waste Part A Permit Application*, DOE/RL-88-21, Vols. 1-3, U.S. Department of Energy-Richland Operations Office, Richland, Washington.

DOE-RL, 1993, *Hanford Site Background: Part 1. Soil Background for Non Radioactive Analytes*, DOE-RL-92.24, U.S. Department of Energy, Richland Operations Office, Richland, Washington.

Dragun, J., 1988, *The Soil Chemistry of Hazardous Materials*, Hazardous Materials Control Research Institute, Silver Spring, Maryland.

Ecology, EPA, and DOE, 1990, *Hanford Federal Facility Agreement and Consent Order*, 2 vol., as amended, Washington State Department of Ecology, U.S. Environmental Protection Agency, and U.S. Department of Energy, Olympia, Washington.

EPA, 1979, *Methods for Chemical Analysis of Water and Wastes*, EPA 600/4-79/020, Office of Research and Development, U.S. Environmental Protection Agency, Cincinnati, Ohio.

EPA, 1980, *Interim Guidelines and Specifications for Preparing Quality Assurance Project Plans*, EPA-QAMS-008/80, U.S. Environmental Protection Agency, Washington, D.C.

EPA, 1990, *Test Methods for Evaluating Solid Waste: Physical/Chemical Methods*, SW-846, Supplement 1990, U.S. Environmental Protection Agency, Washington, D.C.

EPA, 1991, *Integrated Risk Information System (IRIS)*, Toxnet Online Database, U.S. Environmental Protection Agency, Washington, D.C.

Merck, 1989, *The Merck Index: An Encyclopedia of Chemicals, Drugs, and Biologicals*, 11th Edition, Merck & Co., Inc., Rahway, New Jersey.

PNL, 1993, *Climatological Data Summary 1993, Historical Data*, PNL-9809, Pacific Northwest Laboratories, Richland, Washington.

Sax, N. I. and R. J. Lewis, Sr., 1987, *Hawley's Condensed Chemical Dictionary*, 11th Edition, Van Nostrand Reinhold, New York, New York.

WHC, 1988a, *Environmental Investigations and Site Characterization Manual*, WHC-CM-7-7, Westinghouse Hanford Company, Richland, Washington.

WHC, 1988b, *Quality Assurance Manual*, WHC-CM-4-2, Westinghouse Hanford Company, Richland, Washington.

WHC, 1989, *Document Control and Records Management Manual*, WHC-CM-3-5, Westinghouse Hanford Company, Richland, Washington.

WHC, 1990a, *Environmental Engineering, Geotechnology, and Permitting Function Quality Assurance Program Plan*, WHC-EP-0330, Westinghouse Hanford Company, Richland, Washington.

WHC, 1990b, *Sample Management and Administrative Manual*, WHC-CM-5-3, Westinghouse Hanford Company, Richland, Washington.

WHC, 1990c, *Health Physics Procedures Manual*, WHC-IP-0692, Westinghouse Hanford Company, Richland, Washington.

WHC, 1991a, *Characterization and Use of Soil and Groundwater Background for the Hanford Site*, WHC-MR-0246, Westinghouse Hanford Company, Richland, Washington.

WHC, 1991b, *Site-wide Background Soil Sampling Plan*, WHC-SD-EN-AP-052, Westinghouse Hanford Company, Richland, Washington.

WHC, 1993a, *Data Validation Procedures for Chemical Analyses*, WHC-SD-EN-SPP-002, Rev. 2, Westinghouse Hanford Company, Richland, Washington.

WHC, 1993b, *Groundwater Maps of the Hanford Site*, WHC-EP-0394-6, Westinghouse Hanford Company, Richland, Washington.

WHC, 1993c, Correspondence, *Demolition Site Notice of Deficiency Responses*, dated April 13, 1993, Westinghouse Hanford Company, Richland, Washington.

WHC, 1994, *200 West Area Ash Pit Demolition Site Sampling and Analysis Plan*, WHC-SD-EN-AP-172, Rev.0, Westinghouse Hanford Company, Richland, Washington.

9.2 CODE OF FEDERAL REGULATIONS AND FEDERAL REGISTER

29 CFR 1910, "Occupational Safety and Health Standards," Title 29, *Code of Federal Regulations*, Part 1910, as amended, Occupational Safety and Health Administration, Washington, D.C.

40 CFR 261, "Identification and Listing of Hazardous Waste," Title 40, *Code of Federal Regulations*, Part 261, U.S. Environmental Protection Agency, Washington, D.C.

40 CFR 262, "Standards Applicable to Generators of Hazardous Waste," Title 40, *Code of Federal Regulations*, Part 262, as amended, U.S. Environmental Protection Agency, Washington, D.C.

40 CFR 265, "Interim Status Standards for Owners and Operators of Hazardous Waste, Treatment, Storage, and Disposal Facilities," Title 40, *Code of Federal Regulations*, Part 265, as amended, U.S. Environmental Protection Agency, Washington, D.C.

40 CFR 270, "EPA Administered Permit Programs: The Hazardous Waste Permit Program," Title 40, *Code of Federal Regulations*, Part 270, as amended, U.S. Environmental Protection Agency, Washington, D.C.

49 CFR 172, "Hazardous Materials Tables and Hazardous Materials Communications Requirements and Emergency Response Information Requirements," Title 49, *Code of Federal Regulations*, Part 172, as amended, U.S. Department of Transportation, Washington, D.C.

49 CFR 173, "Shippers-General Requirements for Shipments and Packaging," Title 49, *Code of Federal Regulations*, Part 173, as amended, U.S. Department of Transportation, Washington, D.C.

49 CFR 178, "Shipping Container Specification," Title 49, *Code of Federal Regulations*, Part 178, as amended, U.S. Department of Transportation, Washington, D.C.

49 CFR 179, "Specifications for Tank Cars," Title 49, *Code of Federal Regulations*, Part 179, U.S. Department of Transportation, Washington, D.C.

9.3 FEDERAL AND STATE ACTS

Atomic Energy Act of 1954, 42 USC 2011 et seq.

Comprehensive Environmental Response Compensation and Liability Act of 1980, as amended, 42 USC 9601 et seq.

Resource Conservation Act of 1976, as amended, 42 USC 6901 et seq.

State of Washington Hazardous Waste Management Act of 1976, Revised Code of Washington, Chapter 70.105 et seq., Olympia, Washington.

9.4 WASHINGTON ADMINISTRATIVE CODE AND REVISED CODE OF WASHINGTON

WAC 173-303, *Dangerous Waste Regulations*, Washington Administrative Code, Washington State Department of Ecology, Olympia, Washington.

WAC 173-340, *Model Toxics Control Act Cleanup Regulations*, as amended, Washington State Department of Ecology, Olympia, Washington.

APPENDICES

This page intentionally left blank.

APPENDIX 2A

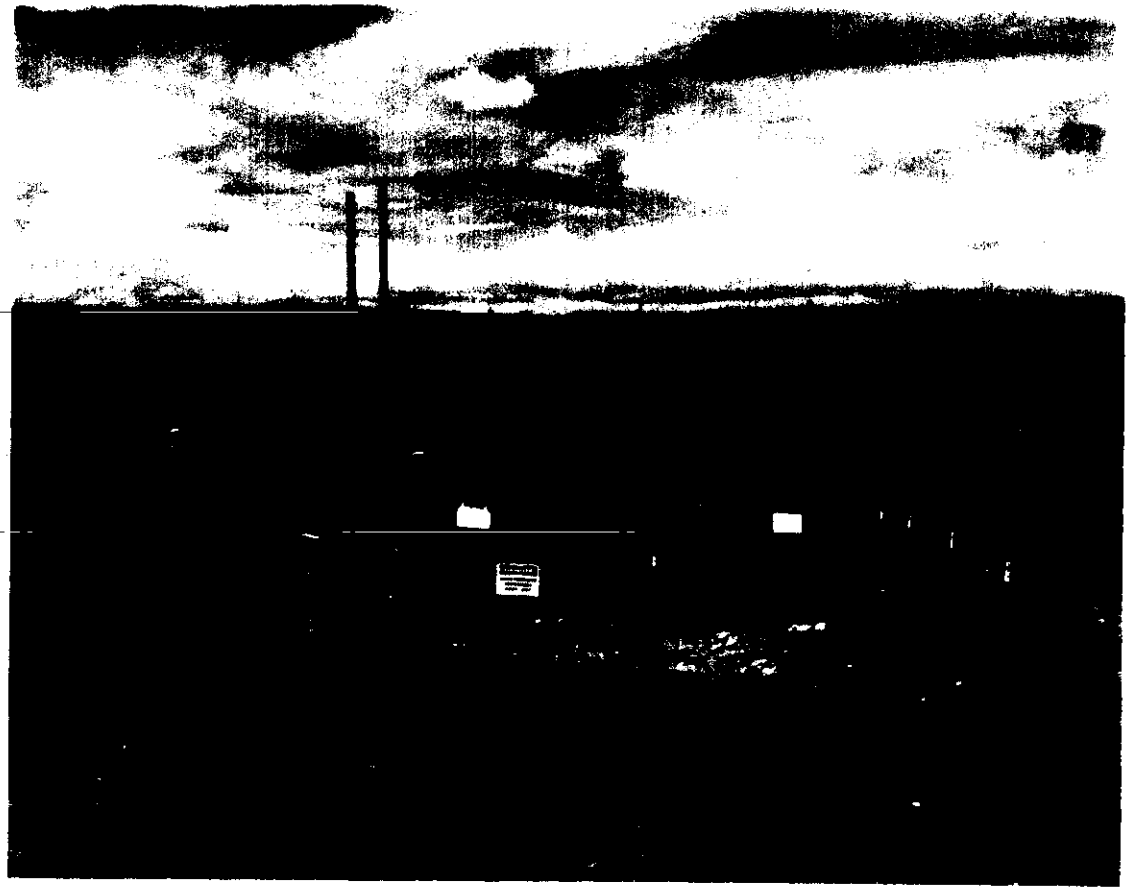
200 WEST AREA ASH PIT DEMOLITION SITE PHOTOGRAPHS

This page intentionally left blank.

94090243-14CN
(Photograph taken 1994)

1 200 West Area Ash Pit Demolition Site, Facing Southwest.

THIS PAGE INTENTIONALLY
LEFT BLANK



94090243-13CN
(Photograph taken 1994)

1 200 West Area Ash Pit Demolition Site, Facing Northwest.

THIS PAGE INTENTIONALLY
LEFT BLANK

APPENDIX 4A

TOXICITY DATA

This page intentionally left blank.

Table 4A-1.

Waste Identification		Toxicity Values				Model Toxics Control Act Cleanup Levels (mg/kg unless noted)			
Chemical Name	C.A.S. (c) Number	Oral Chronic RfD mg/(kg*d)	Cancer Slope Factor (kg*d)	RfD Updated/Source	Cancer Slope Factor, Updated Source	Method A soil Residential	Method B Soil		Sitewide Bkgrd (mg/kg)
							Non-Cancer	Cancer	
Inorganics									
Aluminum powder	7440-90-5	1E+0	NA	Sept-92 (b)			80000		28800
Chromium metal powder	7440-47-3						80000(d)		320
Nitrate expressed as N	14797-55-8	1.6E+0		(a)			130000		906
Nitrate expresses as NO3-	14797-55-8	7.1E+0		RfD calculated from Nitrate as N			570000		906
Organics									
Acetone	67-64-1	1E-1	NA	(a)			8000		NA
Acrolein	107-02-8	NA	NA						NA
Allyl magnesium	1730-25-2	NA	NA						NA
Aluminum chloride	7446-70-0	NA	NA						NA
Ammonium nitrate	6484-52-2	NA	NA						NA
Benzene	71-43-2	NA	2.9E-2		(a)	0.5		34	NA
bis (2-chloroethoxy) ethane	112-26-5	NA	NA						NA
Bromobenzene	108-86-1	NA	NA						NA
2-butoxyethanol	111-76-2	NA	NA						NA
Butyllithium	109-72-8	NA	NA						NA
Cyclohexane	110-82-7	NA	NA						NA
Diisopropyl benzene	577-55-9	NA	NA						NA
Dimethyl hydrazine	57-14-7	NA	2.6E+0		(b)			0.38	NA
1,4 dioxane	123-91-1	NA	1.1E-2		(a)			91	NA
Ethyl acetate	141-78-6	9E-1		(a)			72000		NA
di-Ethyl ether	60-29-7	NA	NA						NA
Ethylene glycol monoethyl	110-80-5	NA	NA						NA

Table 4A-1.

Waste Identification		Toxicity Values				Model Toxics Control Act Cleanup Levels (mg/kg unless noted)			
Chemical Name	C.A.S. (c) Number	Oral Chronic RfD mg/(kg*d)	Cancer Slope Factor (kg*d)	RfD Updated/Source	Cancer Slope Factor, Updated Source	Method A soil Residential	Method B Soil		Sitewide Bkgrd (mg/kg)
							Non-Cancer	Cancer	
Organics cont.									
ether									NA
Ethyl ether	60-29-7	2E-1	NA	(a)			16000		NA
Glycerin	56-81-5	NA	NA						NA
Heptane	142-82-5	NA	NA						NA
Hexane	110-54-3	6E-2	NA	(b)			4800		NA
Hydrazine	302-01-2	NA	3.0E+0		(a)			0.33	NA
hydrogen sulfide	7783-06-4	3E-3	NA	(a)			240		NA
Isopropyl ether	108-20-3	NA	NA						NA
Lithium hydride	7580-67-8	NA	NA						NA
p-Nitrobenzoyl chloride	122-04-3	NA	NA						NA
Methanol	67-56-1	5E-1	NA	(a)			40000		NA
Naphtha	8030-30-6	NA	NA						NA
Nitroglycerin dynamite	55-63-0	NA	NA						NA
Nitromethane	75-52-5	NA	NA						NA
Pentaerythrite tetranitrate	78-11-5	NA	NA						NA
Petroleum ether	8032-32-4	NA	NA						NA
Phenyl ether	101-84-8	NA	NA						NA
Picric acid	88-89-1	NA	NA						NA
Picryl chloride	88-88-0	NA	NA						NA
Sodium peroxide	1313-60-6	NA	NA						NA
Tetrahydrofuran	109-99-9	NA	NA						NA
Tetrahydronaphthalene	119-64-2	NA	NA						NA
Triethylborane in hexane	97-94-9	NA	NA						NA
Toluene	108-88-3	2E-1	NA	(a)		40	16000		NA

MODEL TOXICS CONTROL ACT EQUATIONS

Non-Cancer Cleanup Level = RfD* (ABW * UCF * HQ) / (SIR * ABI * FOC)

Cancer Cleanup Level = [(RISK * ABW * LIFE * UCF) (SIR *ABI *DUR *FOC)]/Slope Factor

EQUATION PARAMETERS**

Parameters	Units	Method B	
		Non Cancer	Cancer
Unit Conversion Factor (UCF)	mg/kg	1.00E+06	1.00E+06
Average body weight over period of exposure (ABW)	kg	16	16
Soil Ingestion Rate (SIR)	mg/day	200	200
Gastrointestinal absorption rate (ABI)		1	1
Frequency of contact (FOC)		1	1
Hazard Quotient (HQ)		1	
Lifetime (LIFE)	yrs		75
Duration of exposure (DUR)	yrs		6
(RISK) cancer risk level			1.00E-06

Notes:
(a)EPA, Integrated Risk Information System (IRIS database), U.S. Environmental Protection Agency, Washington D.C. Oral RfDs, cancer slope factors, and cancer class are updated first quarter of 1994 unless otherwise noted.
(b)Toxicity values obtained from EPA Health Effects Assessment Summary Tables, (HEAST), Environmental Protection Agency, Washington, D.C. This data updated March, 1993 unless otherwise noted.
(c)C.A.S. - Chemical Abstract System Registry Numbers, Chemical Abstract Service is a division of the American Chemical Society.
(d)MTCA Method B non-cancer cleanup level for chromium III.
**Ecology 1991b
NA = Not available

This page intentionally left blank.

APPENDIX 7A

QUALITY ASSURANCE PROJECT PLAN FOR SOIL SAMPLING AND ANALYSIS FOR THE 200 WEST AREA ASH PIT DEMOLITION SITE

This page intentionally left blank.

7A.0 QUALITY ASSURANCE PROJECT PLAN FOR SOIL SAMPLING AND ANALYSIS FOR THE 200 WEST AREA ASH PIT DEMOLITION SITE

This appendix provides the quality assurance and quality control information for assuring that the Ash Pit Demolition Site closure activities (Chapter 7.0) will provide suitable closure data.

7A.1 PROJECT DESCRIPTION

On two occasions, in November of 1984 and June of 1986, discarded explosive chemical products, consisting predominantly of organic compounds and metal salts, were detonated at the Ash Pit Demolition Site. This TSD unit will undergo closure consistent with WAC 173-303. The present status of soil contamination at the Ash Pit Demolition Site is unknown. One or more rounds of soil sampling and analysis are proposed in the closure plan to identify and characterize constituents of concern in the soils at the Ash Pit Demolition Site. This quality assurance project plan (QAPjP) has been prepared for regulatory review with the closure plan in support of proposed sampling and analysis activities.

7A.1.1 Project Objectives

The principal objective of phase one investigative sampling is to facilitate a RCRA clean closure of the site by verifying that the concentrations of all detonation activity contaminants are at or below action levels. Action levels are defined as levels above the Hanford Site soil background levels (DOE-RL 1993) and MTCA (WAC 173-340) Method B levels. If analysis determines that levels are above both these guidelines, a phase two investigation will be developed. Ten soil samples were taken from specific locations within a 7.5-foot radius centered at the blasting pit. Collected samples are being analyzed by an offsite contracted laboratory.

If any soil is removed from the Ash Pit Demolition Site to facilitate closure, a second round of sampling and analysis (verification sampling) would be performed to demonstrate that soil removal objectives had been achieved (i.e., that residual contamination levels were below the proposed cleanup values).

7A.1.2 Applicability and Relationship to the Onsite Contractor's Quality Assurance Program

This QAPjP applies specifically to field activities and laboratory analyses to be performed in support of closure of the Ash Pit Demolition Site. This QAPjP has been prepared in compliance with the *Environmental Engineering, Geotechnology, and Permitting Function Quality Assurance Program Plan* (WHC 1990a) and the *Interim Guidelines and Specifications for Preparing Quality Assurance Project Plans, (EPA-1980)*. This QAPjP describes the means selected to implement quality assurance program requirements, defined in the

Quality Assurance Manual (WHC 1988b), as the requirements apply to environmental investigations, while accommodating the specific requirements for project plan format and content agreed upon in the Tri-Party Agreement. The project plan contains a matrix of procedural resources from *Environmental Engineering, Geotechnology, and Permitting Function Quality Assurance Program Plan* (WHC 1990a) and *Environmental Investigations and Site Characterization Manual* (WHC 1988a). This QAPjP is subject to mandatory review and revision in advance of initiation of field sampling activities. Distribution and revision control of this plan will be carried out in compliance with QR 6.0, "Document Control," and QI 6.1, "Quality Assurance Document Control" (WHC 1988b). All plans and procedures referenced in this QAPjP are available for regulatory review.

7A.2 DATA QUALITY OBJECTIVES FOR MEASUREMENTS

Data quality objectives (DQO) for a given data collection activity describe the overall level of uncertainty that decision makers are prepared to accept in the analytical results deriving from the activity. Sampling and analysis agreements resulted from DQO meetings and are summarized in the SAP (Appendix 7C). Data quality requirements generally are defined in terms of specific objectives for precision, accuracy, representativeness, comparability, and completeness. Objectives for soil sampling at the Ash Pit Demolition Site are described in this section.

Precision typically is calculated either as a range (R) (for duplicate measurements) or a standard deviation (σ). Precision also can be expressed as a relative range (RR) (for duplicates) or a relative standard deviation (RSD). When the precision for a method is not constant over the concentration range of interest, the reported range or standard deviation will describe the concentration dependence. The dependence alternatively could be described in terms of a slope and intercept for a linear relationship, an indicated function for a nonlinear relationship, or a tabulated set of precision values for specific indicated concentrations.

Accuracy usually is expressed as percent recovery (P) or as percent bias (P-100). When accuracy is observed to be significantly concentration dependent, it could be reported in terms of a linear relationship, an alternative functional relationship, or as a table of measured values.

The method detection limit is the minimum concentration of a chemical constituent that can be measured reliably (i.e., it can be reported with 99 percent confidence that the analyte concentration is greater than zero). The method detection limit is determined from a minimum of three replicate analyses of samples of a given matrix type (water, soil, etc.) spiked with the analyte of interest at a concentration three to five times the estimated method detection limit. The method detection limit is the standard deviation of the replicate measurements (reported in concentration units) multiplied by the appropriate Student's t value for the number of replicates taken for a one-tailed test at the 99 percent level of confidence. Practical quantitation limit is defined in SW-846 (EPA 1990) as the lowest concentration level that can be determined reliably within specified limits of precision and accuracy

during routine laboratory operating conditions. Practical quantitation limit values are tabulated in SW-846 for various EPA approved analytical methods for evaluating solid waste. Practical quantitation limit values are matrix-dependent and method-dependent. Typically, practical quantitation limits are listed as multiples of the method detection limits for specified methods and matrix types.

The performance of the analytical laboratory will be subject to method- and analyte-specific quantitation limits and minimum requirements for precision, accuracy, and completeness as follows:

- Precision: The agreement among a set of replicate measurements without assumption of knowledge of the true value. Precision is estimated by means of duplicate/replicate analyses. These samples should contain concentrations of analyte above the MDL, and may involve the use of matrix spikes. The most commonly used estimates of precision are the relative standard deviation (RSD) or the coefficient of variation (CV),

  $$RSD = 100CV = 100\ lc/\bar{x}$$

  where:

  $\bar{x}$ = the arithmetic mean of the x_i measurements, and lc = standard deviation. The relative percent difference (RPD) when only two samples are available is:

  $$RPD = 100\ [(x_1 - x_2)/\{(x_1 + x_2)/2\}].$$

  (EPA 1990)

- Accuracy: The closeness of agreement between an observed value and an accepted reference value. When applied to a set of observed values, accuracy will be a combination of a random component and of a common systematic error (or bias) component (EPA 1990).

- Completeness: Requirements for precision and accuracy will be met for at least 95 percent of the total number of determinations on routine and quality control samples.

More stringent requirements for precision and accuracy could be specified in procedures for individual laboratory methods. In that event, the more stringent requirements also will apply as DQOs for this project.

Goals for data representativeness for soil sampling are addressed qualitatively by the specification of sample locations and intervals in the soil sampling and analysis plan. Sample data should be comparable with other measurement data for similar samples and sample conditions. Comparability will be achieved qualitatively by using standard techniques to collect and analyze representative samples and by reporting analytical results in appropriate units.

Approved analytical procedures will require adherence to reporting techniques and units that are consistent with EPA reference methods to facilitate the comparability of data sets in terms of precision and accuracy. Actual achieved and/or used detection limits, and values for precision, accuracy, and completeness will be provided in all summary reports of analyses.

Failure to conform to these criteria will be documented in data summary reports as described in Section 7A.7.1, and will be evaluated in the validation process discussed in Section 7A.7.2. Corrective actions will be initiated by the Technical Lead as appropriate, as noted in Section 7A.12, in the event that the criteria initially are not achieved.

For any soil sampling activities that are to occur at the Ash Pit Demolition Site subsequent to investigative sampling, the SAP (Appendix 7C) will be updated to reflect current constituents of concern and DQOs as project requirements.

7A.3 PROCEDURES

The following sections discuss sampling procedures to be used and the approvals and control of these procedures.

7A.3.1 Procedure Approvals and Controls

The following sections describe the procedures referenced to support soil sampling and analysis activities.

7A.3.1.1 Hanford Site Procedures. The Hanford Site procedures that have been referenced to support soil sampling and analysis activities for the Ash Pit Demolition Site are listed in the quality assurance program index in the *Environmental Engineering, Geotechnology, and Permitting Function Quality Assurance Program Plan* (WHC 1990a). Referenced procedures include EIIs (WHC 1988a), and quality requirements (QRs) and quality instructions (QIs) (WHC 1988b). Requirements relating to approval, revision, and distribution control of EIIs are addressed in EII 1.2, "Preparation and Revision of Environmental Investigation Instructions"; requirements applicable to QIs and QRs are addressed in QR 5.0, "Instructions, Procedures, and Drawings"; QI 5.1, "Preparation of Quality Assurance Documents:; QR 6.0, "Document Control"; and QI 6.1, "Quality Assurance Document Control". Other controlling documents that apply to preparation, review, and revision of Hanford Site analytical laboratory procedures and sample management procedures are identified under Criteria 5.00 and 6.00 in the *Environmental Engineering, Geotechnology, and Permitting Function Quality Assurance Program Plan* (WHC 1990a). All of the aforementioned procedures will be available on request for regulatory review.

7A.3.1.2 Participating Contractor and/or Subcontractor Procedures. Participating contractor and/or subcontractor services may be procured for sampling or technical assistance. All such procurements will be subject to the applicable requirements of QR 4.0, "Procurement Document Control"; QI 4.1,

"Procurement Document Control"; QI 4.2, "External Services Control"; QR 7.0, "Control of Purchased Items and Services"; QI 7.1, "Preprocurement Planning and Proposal Evaluation"; and/or QI 7.2, "Supplier Evaluation" (WHC 1988b). Whenever such services require procedural controls, conformance to onsite procedures, or submittal of contractor procedures for onsite review and approval before implementation, the requirement(s) will be identified in the procurement document or work order, as applicable. Analytical laboratories will be required to submit their analytical procedures as well as the current version of their internal quality assurance program plans for review and approval. The subject plans and procedures will be reviewed and approved by operations contractor's quality assurance, sample management, and analytical laboratories organization personnel, and/or other qualified personnel as determined by the Technical Lead. As necessary, all reviewers will be qualified per the requirements of EII 1.7, "Indoctrination, Training, and Qualification" (WHC 1988a). All approved participating contractor or subcontractor procedures, plans, and/or manuals will be retained as project quality records in compliance with the *Document Control and Record Management Manual*, Section 9 (WHC 1989); QR 17.0, "Quality Assurance Records"; and QI 17.1, "Quality Assurance Records Control" (WHC 1988b). All such documents will be available on request for regulatory review.

7A.3.2 Sampling Procedures

Soil samples for analysis by an offsite contractor laboratory will be collected in compliance with EII 5.2, "Soil and Sediment Sampling" (WHC 1988a). Sample numbers will be assigned as indicated in EII 5.10, "Obtaining Sample Identification Numbers and Accessing HEIS Data" (WHC 1988a). Sampling activities will be carried out in conformance with the sample identification, container type, preparation, and preservation requirements of EII 5.11, "Sample Packaging and Shipping" (WHC 1988a).

7A.3.3 Procedure Additions and Changes

Additional EIIs or modifications to existing EIIs that might be required as a consequence of sampling plan requirements will be developed in compliance with EII 1.2, "Preparation and Revision of Environmental Investigations Instructions" (WHC 1988a). Should deviations from established EIIs be required to accommodate unforeseen field situations, the Field Team Leader can authorize such deviations consistent with provisions and requirements in EII 1.4, "Deviation from Environmental Investigations Instructions" (WHC 1988a). Deviations are documented, reviewed, and dispositioned by means of instruction change authorization forms, as required by EII 1.4. Other types of document change requests will be completed as required by the procedures governing their preparation and revision.

7A.4 SAMPLE CUSTODY

All samples obtained during the course of this investigation will be controlled from the point of origin to the analytical laboratory as stipulated

in EII 5.1, "Chain of Custody" (WHC 1988a). Chain-of-custody documentation also will be maintained for the return of residual sample materials from the laboratory. Requirements and procedures will be defined in procurement documentation to subcontractor or participant contractor laboratories for the return of residual sample materials after completion of analysis. Laboratory chain-of-custody procedures will ensure that sample integrity and identification are maintained throughout the analytical process and will be reviewed and approved in advance as required by onsite procurement control procedures, as noted in Section 7A.3.1.2.

Results of analyses will be traceable to the original samples through a unique code or identifier, as specified in Section 7A.3. All analytical results will be controlled as permanent project quality records as required by QR 17.0, "Quality Assurance Records" (WHC 1988b) and EII 1.6, "Records Management" (WHC 1988a).

Sample and/or data flow will be coordinated by the Commercial Analytical Services (CAS) sample management organization. The CAS organization will be responsible for tracking, controlling, and verification of in-process samples and data per Section 1.0, "Sample Tracking"; Section 1.3, "Data Package Control", and Section 1.1, "Data Package Verification" (WHC 1990b).

All soil samples will be screened in the field for beta/gamma and gross alpha radioactivity in compliance with approved Hanford Site health physics procedures (WHC 1988c). Samples must be released for offsite shipment by health physics technicians before the samples can be transported to offsite laboratories for analysis of dangerous constituents.

7A.5 CALIBRATION PROCEDURES

Calibration of the contracting laboratory analytical equipment will be performed per applicable standard methods, subject to review and approval.

7A.6 ANALYTICAL PROCEDURES

Specific analytical methods or procedures will be reviewed and approved before use in compliance with the procedures and procurement control requirements noted in SAP (Appendix 7C).

7A.7 DATA REDUCTION, VALIDATION, AND REPORTING

Data reduction, validation of completed laboratory data packages, reporting requirements, and review and records management are discussed in the following sections.

7A.7.1 Data Reduction and Data Package Preparation

On completion of each group of analyses, the analytical laboratory will be responsible for preparing a report summarizing the analytical results. The analytical laboratory also will prepare a detailed data package that will include all information necessary to perform data validation to the extent indicated by the minimum applicable requirements of Section 7A.7.2. Data summary report format and data package content will be defined in procurement documentation subject to review and approval as noted in Section 7A.3.1. As a minimum, laboratory data packages will include the following:

- Sample receipt and tracking documentation (including identification of the organization and individuals performing the analysis, the names and signatures of the responsible analysts, sample holding time requirements, references to applicable chain-of-custody procedures, and the dates of sample receipt, extraction, and analysis)

- Instrument calibration documentation, including equipment type and model, with continuing calibration data for the time period in which the analyses were performed

- Quality control data, as appropriate for the methods used, including matrix-spike/matrix-spike duplicate data, recovery percentages, precision data, laboratory blank data, and identification of any nonconformances that might have affected the laboratory's measurement system during the time in which the analyses were performed

- The analytical results or data deliverables, including reduced data, reduction formulas or algorithms, and identification of data outliers and/or deficiencies.

Other supporting information, such as initial calibration data, reconstructed ion chromatographs (IC), spectrograms, traffic reports, and raw data, are included in submittal of individual data packages. All sample data will be retained by the analytical laboratory and made available for systems or program audit purposes upon the request of the operations contractor, DOE-RL, or regulatory agency representatives (Section 7A.9.0). Such data will be retained by the analytical laboratory through the duration of the contractual statement of work, at which time the data will be transmitted for archiving.

A completed data package will be reviewed and approved by the analytical laboratory quality assurance manager before the package is submitted to the sample management organization for validation.

The requirements of this section will be included in procurement documents and/or work orders, as appropriate, in compliance with the procurement control procedures identified in Section 7A.3.1.

7A.7.2 Validation

Validation of completed laboratory data packages will be performed by the sample management organization. Data validation and reporting will be performed in conformance with requirements and procedures identified in *Sample Management and Administration* (WHC 1990b) and the *Data Validation Procedures for Chemical Analyses* (WHC 1993a).

Data validators will perform a number of tasks on each sample delivery group in response to general and specific requirements identified in the data validation procedures (WHC 1993a). A sample delivery group is defined as a group of samples (usually 20 or fewer) reported within a single laboratory data package. These tasks are summarized as follows:

- Take delivery of the data package, stamp the receipt date on the package, and make duplicate copies of the sample concentration reports or report forms

- Organize and review the data package for completeness as described in the data validation procedures (WHC 1993a) and document the completeness review on the applicable data validation checklist

- Validate the data package and qualify sample results according to the procedures and criteria described in the data validation procedures (WHC 1993a). Data that are rejected at any point during validation will be eliminated from further review or consideration

- Check for calculation and transcription errors, applying the frequency guidelines identified below

- Resolve any discrepancies identified during the review of the data package, including any missing data, with the laboratory

- After the data have been validated, prepare a narrative summary of the acceptability of the data, and prepare a summary of the validated results in tabular and electronic formats

- Submit the data validation report, with the narrative summary, an electronic media copy of the data, checklists, summary forms, and the qualified laboratory concentration reports to the Technical Lead within 21 days after receipt of the data package from the laboratory.

For this sampling and analysis project, the following frequencies will be used to check for calculation and transcription errors.

- **Investigative samples and verification samples taken following soil removal**--All reported laboratory results for at least 20 percent of the samples contained in the sample delivery group and 100 percent of the reported quality control samples (duplicates, matrix spikes, field blanks and any performance audit samples) will be recalculated and verified against the instrument printouts and bench sheet

records (raw data). If possible, at least one-half of the samples selected for recalculation should contain positive results for the compounds analyzed.

- **Confirmatory samples**--All reported laboratory results for 100 percent of the samples contained in the sample delivery group and 100 percent of the reported quality control samples (duplicates, matrix spikes, field blanks and any performance audit samples) will be calculated and verified against the raw data.

Reporting requirements for validation of data produced by routine and special analytical methods other than EPA reference methods (EPA 1990) will be established within applicable procedures for the individual methods, subject to review and approval as discussed in Section 7A.4.1. The reporting requirements will be in general compliance with the guidelines provided previously in this section.

7A.7.3 Final Review and Records Management Considerations

All validation reports and supporting analytical data packages will be subjected to a final technical review by a qualified reviewer at the direction of the Technical Lead before submittal to regulatory agencies or inclusion in reports or technical memoranda. All validation reports, data packages, and review comments will be retained as permanent project quality records in compliance with *Document Control and Records Management Manual*, Section 9 (WHC 1989) and QR 17.0, "Quality Assurance Records" (WHC 1988b).

7A.8 INTERNAL QUALITY CONTROL

All analytical samples will be subject to in-process quality control measures both in the field and in the laboratory. The following types of control samples are specified in the sampling and analysis plan for the purpose of maintaining internal quality control.

- Duplicate Samples--Field duplicate samples are samples retrieved from a single sampling location using the same equipment and sampling technique, but analyzed independently. Duplicate samples generally are used to verify the repeatability or reproducibility of the analytical data.

- Trip Blanks--A trip blank for soil sampling consists of a sample container of silica sand that is prepared in the laboratory, transported to the sampling site, and returned unopened for analysis with the actual soil samples. Analysis of the trip blank will eliminate false positive results for the actual samples arising from contamination during shipment.

- Equipment Blanks--An equipment blank for soil sampling consists of pure silica sand that is drawn through decontaminated sampling equipment and placed in a container identical to those used for the actual field samples. Equipment blanks are used to verify the adequacy decontamination procedures for sampling equipment. .

Additional quality control checks will be performed by the analytical laboratories as follows.

- Duplicate or Matrix-Spiked Duplicate Samples--Check for analytical precision.

- Matrix-Spiked Samples--A known quantity of a representative analyte of interest is added to an aliquot (or a replicate) of an actual sample as a measure of recovery percentage. Spike compound selection, quantities, and concentrations will be described in the laboratory's analytical procedures.

- Laboratory Quality Control Samples--A quality control sample is prepared from an independent standard at a concentration within the calibration range. Reference samples provide an independent check on analytical instrument calibration.

The numbers and/or frequencies of quality control samples to be submitted and analyzed with each group of soil samples are specified in the soil sampling and analysis plan of the closure plan. The numbers of quality control samples proposed in the sampling plan have been determined based on guidance presented in SW-846 (EPA 1990).

Detailed descriptions of internal quality control requirements for participating contractor or subcontractor laboratories will be provided in procurement documents or work orders in compliance with standard procedures noted in Section 7A.3.1.

7A.9 PERFORMANCE AND SYSTEM AUDITS

Performance, system, and program audits will begin early in the execution of this sampling plan and continue through completion of activities. Collectively, the audits will address quality affecting activities that include, but are not limited to, measurement accuracy; intramural and extramural analytical laboratory services; field activities; and data collection, processing, validation, and management.

Regarding offsite contractor laboratory analyses of confirmatory soil samples, performance audits of analytical accuracy will be implemented through the use of quality assurance and quality control samples.

System audit requirements will be implemented in accordance with QI 10.4, "Surveillance" (WHC 1988b). Surveillances will be performed regularly throughout the course of sampling activities. Additional performance and system 'surveillances' might be scheduled as a consequence of corrective

action requirements or might be performed on request. All quality affecting activities will be subject to surveillance.

Sampling plan activities could be evaluated as part of environmental restoration program-wide quality assurance audits under procedural requirements (WHC 1988b). Program audits will be conducted in accordance with QR 18.0, "Audits"; QI 18.1, "Audit Programming and Scheduling"; and QI 18.2, "Planning, Performing, Reporting, and Follow-up of Quality Audits". Program audits will be performed by qualified auditors in compliance with QI 2.5, "Qualification of Quality Assurance Program Audit Personnel" (WHC 1988b).

7A.10 PREVENTIVE MAINTENANCE

All measurement and testing equipment used in the field and the laboratory that directly affect the quality of analytical data will be subject to preventive maintenance measures that ensure minimization of measurement system downtime. Preventive maintenance instructions for field equipment will be as stipulated in approved operating procedures for the equipment. Laboratories will be responsible for performing or managing the maintenance of assigned analytical equipment. Maintenance requirements, spare parts lists, and preventive maintenance instructions will be included in individual laboratory procedures or in laboratory quality assurance plans, subject to review and approval. When samples are to be analyzed by a contractor or subcontractor laboratory, preventive maintenance requirements for laboratory analytical equipment will be as defined in the contractor laboratory's quality assurance plan(s).

7A.11 DATA ASSESSMENT

Analytical data will be compiled and summarized by the laboratory and forwarded to the sample management organization for validation as described in Section 7A.7.2 before the data can be used in any assessment activities. Assessments could include various statistical and probabilistic techniques to compare and/or analyze data. The statistical methodologies and assumptions that are to be used to evaluate data will be identified in written instructions that are to be signed, dated, and retained as project quality records in compliance with EII 1.6, "Records Management" (WHC 1988a) and QR 17.0, "Quality Assurance Records" (WHC 1988b). These instructions will be documented in the final report for each sampling and analysis project.

7A.12 CORRECTIVE ACTION

Corrective actions required as a result of surveillance reports, nonconformance reports, or audit activities will be documented and dispositioned as required by QR 16.0, "Corrective Action"; QI 16.1, "Trending/Trend Analysis"; and QI 16.2, "Corrective Action Reporting" (WHC 1988b). Primary responsibilities for corrective action resolution will be assigned to the Technical Lead and the quality assurance coordinator. Other needs for corrections to measurement systems, procedures, or plans that

are identified as a result of routine review processes will be resolved as stipulated in applicable procedures or referred to the Technical Lead for resolution. Copies of all surveillance, nonconformance, audit, and corrective action documentation will be retained as project quality assurance records.

7A.13 QUALITY ASSURANCE REPORTS

As indicated in Sections 7A.9 and 7A.12, project activities will be assessed regularly by audit and surveillance processes. At the conclusion of a given sampling and analysis project, all related field and laboratory data, raw data, reports, surveillance reports, nonconformance reports, audit reports, and corrective action documentation will be transferred for archival to the Hanford Site Records Holding Area (if documentation has not been transmitted previously). In the event that original quality-affecting documents are to be retained and/or controlled by others, legible copies will be transmitted to the Records Holding Area for inclusion in the project record file.

APPENDIX 7B

TRAINING COURSE DESCRIPTIONS

This page intentionally left blank.

Environmental and Hazardous Material Safety Training Matrix.

Employee category	Course title (length)														
	Hazardous Communication and Waste Orientation (1 hour)	Generator Hazards Safety Training (4 hours)	Hazardous Materials Waste Job-Specific Training (length varies with each TSD unit)	Radiation Worker Training (8 hours)	Waste Site Basic (16 hours)	Scott SKA-PAK* Training (2 hours)	Cardiopulmonary Resusciation (4 hours)	Fire Extinguisher Safety (1 hour)	Waste Site Advanced (24 hours)	Waste Site Field Experience (24 hours)	Hazardous Waste Shipment Certification (24 hours)	Certification of Hazardous Material Shipments (8 hours)	Hazardous Waste Site Supervisor/Manager (8 hours)	Compliance Category**	Total hours
1. All employees	X														1
2. General worker		X	X											1	5 + unit-specific training
3. General supervisor/manager		X	X											1	5 + unit-specific training
4. General nonradiological shipper		X	X								X			1,2	29 + unit-specific training
5. General hazardous material shipper		X	X									X		1,2	13 + unit-specific training
6a. Hazardous waste worker (known hazards)		X	X	X	X									1,3	28 + unit-specific training + field experience
6b. Hazardous waste worker (unknown hazards)		X	X	X		X	X	X	X	X				1,4	44 + unit-specific training + field experience
7. Hazardous waste supervisor/manager		X	X	X		X	X	X	X	X			X	1,5	52 + unit-specific training + field experience
8. Hazardous waste shipper		X	X	X		X	X	X	X	X	X	X		1,2,4	76 + unit-specific training + field experience

* Scott SKA-PAK is a trademark of Figgie International, Incorporated.

** Compliance categories:

1 WAC 173-303, 29 CFR 1910.1200
2 49 CFR 173
3 29 CFR 1910.120 (24-hour requirement)
4 29 CFR 1910.120 (40-hour requirement)
5 29 CFR 1910.120 (40-hour plus 8-hour requirement).

ENVIRONMENTAL AND HAZARDOUS MATERIAL SAFETY TRAINING		
	Course name	Description
1.	Hazard Communication and Waste Orientation	Course provides an overview of the federal and applicable hazard communication programs and hazardous and/or dangerous waste disposal programs.
2.	Generator Hazards Safety Training	Course provides the hazardous and/or dangerous material/waste worker with the fundamentals for use and disposal of hazardous and/or dangerous materials.
3.	Hazardous Materials/Waste Job-Specific Training	Course provides specific information on hazardous and/or dangerous chemicals and waste management at the employees' TSD unit.
4.	Initial Radiation Worker Training	Course provides radiation workers with the fundamentals of radiation protection and the proper procedures for maintaining exposures ALARA.
5.	Waste Site Basics	Course provides required information for the safe operation of hazardous and/or dangerous waste TSD units regulated under 40 CFR 264 and 265 pursuant to RCRA and WAC 173-303.
6.	Scott 'SKA-PAK'[1] Training-SKA	Course instructs employees in the proper use of the Scott 'SKA-PAK' for entry, exit, or work in conditions 'immediately dangerous to life and health' and instructs employees to recognize and handle emergencies.
7.	Cardiopulmonary Resuscitation	Course of the American Heart Association that provides certification in cardiopulmonary resuscitation for the single rescuer (Heartsaver Course).

[1]Scott SKA-PAK is a trademark of Figgie International, Incorporated.

	Course name	Description
8.	Fire Extinguisher Safety	Course provides videocassette presentation that covers types of portable fire extinguishers and the proper usage for each.
9.	Waste Site-Advanced	Course provides environmental safety information for RCRA and/or CERCLA operations and sites. Topics include regulations and acronyms, occupational health and safety, chemical hazard information, toxicology, personal protective equipment and respirators, site safety, decontamination, and chemical monitoring instrumentation.
10.	Waste Site Field Experience	Course is a 3-day field experience under the direct supervision of a trained, experienced supervisor.
11.	Hazardous Waste Shipment Certification	Course provides an indepth look at federal, state, and Hanford Site requirements for nonradioactive hazardous and/or dangerous waste management and transportation.
12.	Certification of Hazardous Material Shipments	Course provides training in dangerous material regulation of the U.S. Department of Transportation, as required by law, to those who certify the compliance of Hanford Site hazardous and/or dangerous material shipments. The main focus is on the proper preparation and release of radioactive material shipments.
13.	Hazardous Waste Site Supervisor/Manager	Course provides specialized training to operations and site management in the following programs: safety and health, employee training, personal protective equipment, spill containment, and health hazard monitoring procedures and techniques.

This page intentionally left blank.

APPENDIX 7C

SAMPLING AND ANALYSIS PLAN

This page intentionally left blank.

CONTENTS

THIS PAGE INTENTIONALLY
LEFT BLANK

1.0 PURPOSE

The purpose of this document is to provide guidance for sampling and analysis activities associated with the proposed *Resource Conservation and Recovery Act of 1976* (RCRA) clean closure of the 200 West Ash Pit Demolition Site (Figure 1). This document is a supplement to *200 West Ash Pit Demolition Site Closure Plan* (DOE-RL 1992), and should be used in conjunction with the *Environmental Investigations and Site Characterization Manual* (WHC 1988).

A metric conversion chart (Attachment 1) is provided to the reader as a tool to aid in conversion.

2.0 OBJECTIVE

Ten soil samples will be taken from specific locations (Figure 2) within a 7.5-ft radius centered at the blasting pit. The objective of the work is to facilitate a RCRA clean closure of the site by verifying that the concentrations of all detonation activity contaminants are below action levels. Action levels are defined as levels above the Hanford Site soil background levels identified in *Hanford Site Background: Part 1, Soil Background for Nonradioactive Analytes* (DOE-RL 1993) and Model Toxic Control Act (MTCA) (WAC 173-340) residential levels. If analysis determines that levels are above both these guidelines, a phase two investigation will be developed. This is not anticipated, however, because of the nature of detonation efficiency and weathering action.

3.0 SITE DESCRIPTION/BACKGROUND

The 200 West Ash Pit Demolition Site is located in a multi-use borrow pit in the eastern portion of the 200 West Area, with approximate dimensions of 600 ft x 800 ft. The borrow pit was used for demolition of discarded explosive chemicals, tumbleweed incineration, and as a source of soil for construction material. The demolition site was located apart from these other activities within the borrow pit. None of these other activities are believed to have contaminated the demolition site.

Demolitions occurred at the 200 West Ash Pit Demolition Site in November 1984 and June 1986. Discarded explosive chemicals were placed in a 6- to 12-in depression dug expressly for demolition purposes. During the June 1986 demolition activity, 2 gal of unleaded gasoline were placed with the standard detonating products. All discarded explosive chemicals were detonated in their original closed containers.

A 20 ft x 20 ft surface area containing the visible depression is roped off and marked as a dangerous waste site. The site also is marked by surveyed monuments.

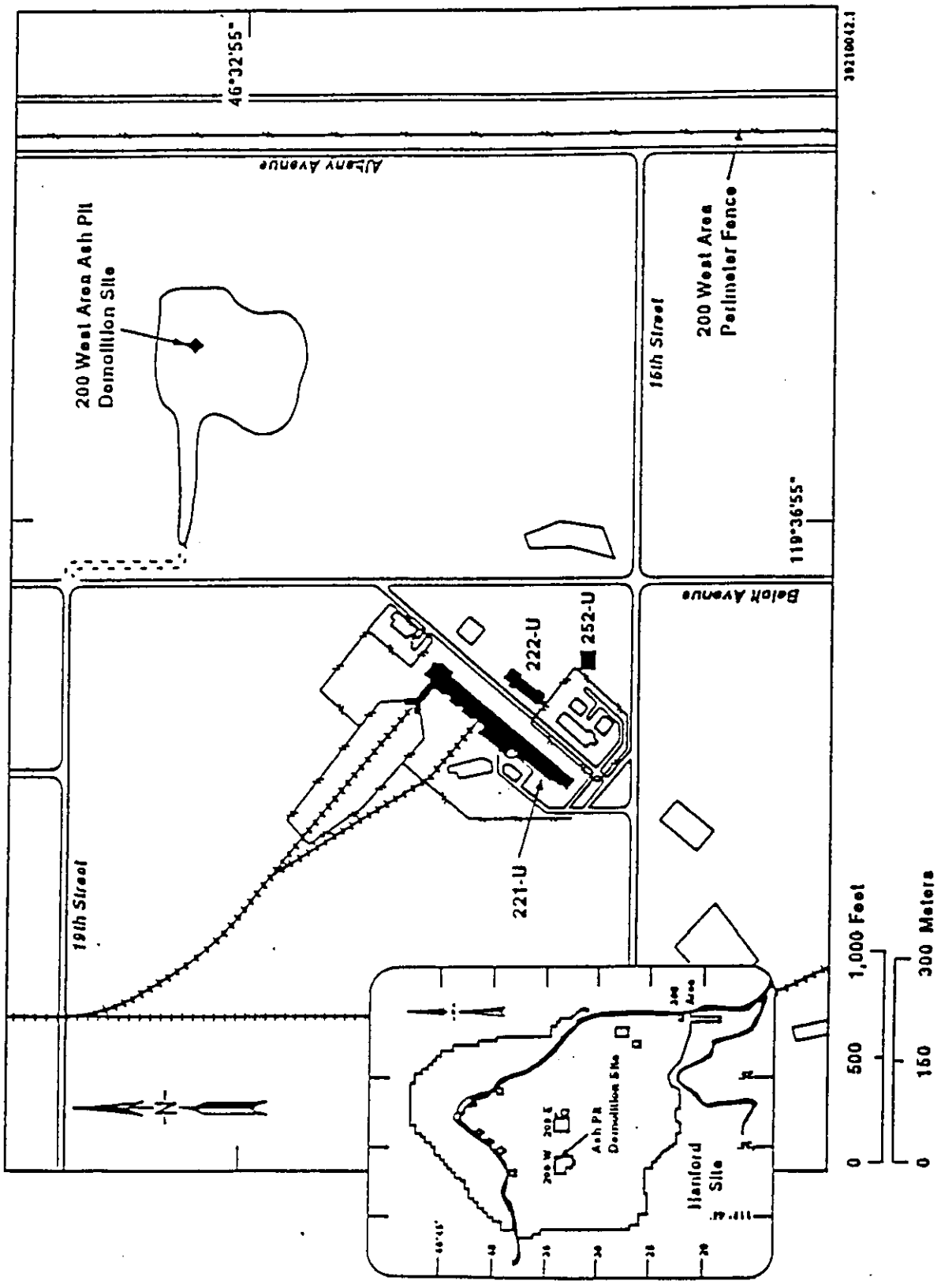


Figure 1. 200-W Ash Pit Demolition Site.

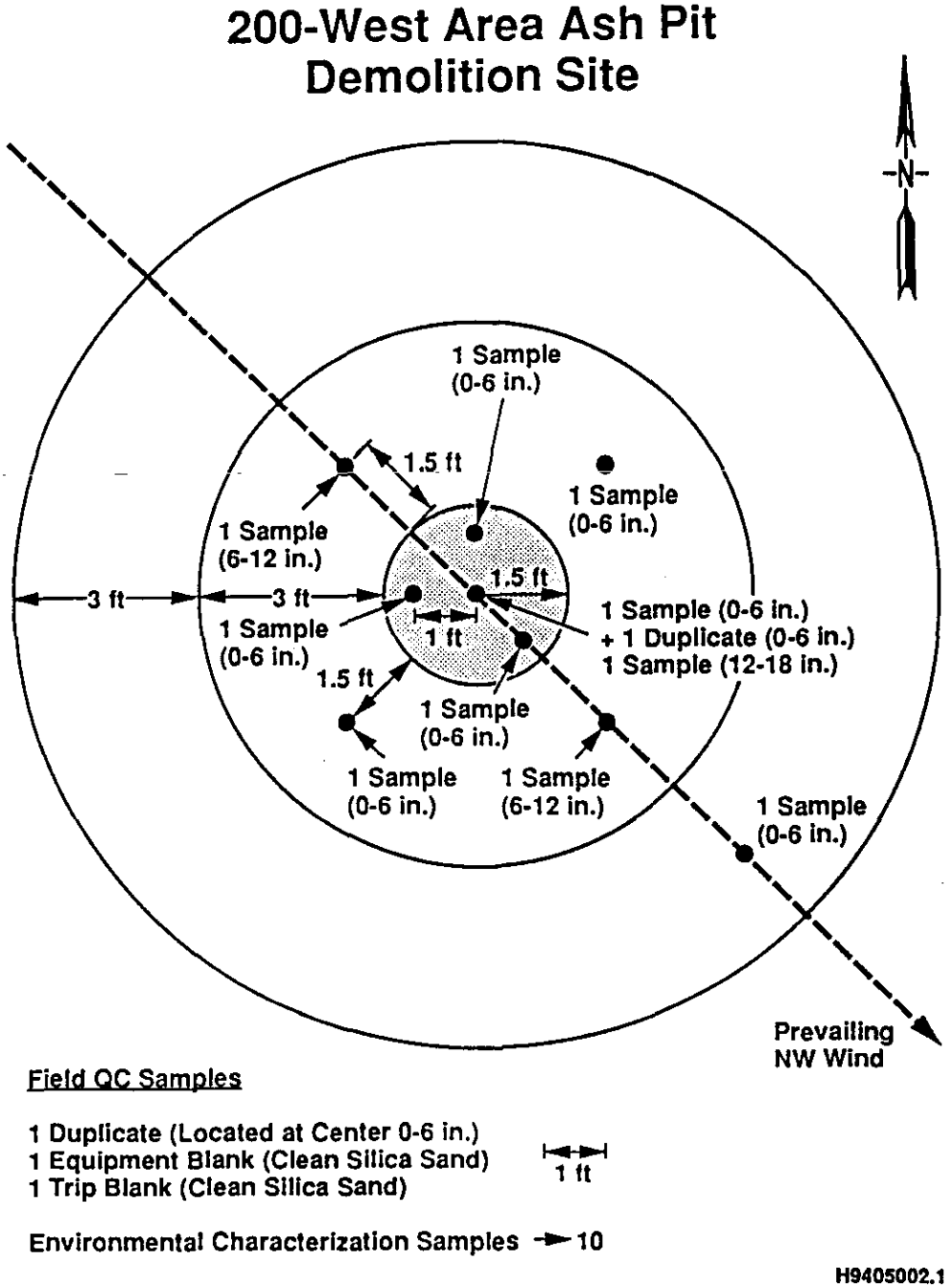


Figure 2. Soil Sample Locations/Depth.

4.0 SCOPE OF WORK

Ten soil characterization samples will be taken by hand from locations (Figure 2) at the 200 West Ash Pit Demolition Site.

All sampling activities will be conducted in accordance with the following environmental investigations instructions (EII) procedures (WHC 1988):

- EII 1.1, Hazardous Waste Site Entry Requirements
- EII 1.5, Field Logbooks
- EII 1.13, Environmental Readiness Review
- EII 5.1, Chain of Custody
- EII 5.2, Soil and Sediment Sampling
- EII 5.5, 1706 KE Laboratory Decontamination of RCRA/CERCLA Sampling Equipment
- EII 5.10, Obtaining Sample Identification Numbers and Accessing HEIS Data
- EII 5.11, Sample Packaging and Shipping
- EII 14.1, Analytical Laboratory Data Management.

5.0 SAMPLING AND FIELD ACTIVITIES

This section describes Task 1, Sampling of the 200 West Ash Pit Demolition Site.

5.1 SUBTASK 1A - SAMPLE LOCATION DETERMINATIONS

The blasting pit will be reconstructed by removing wind blown sand to create a 1-ft-deep, 3-ft diameter hole. The pit will be located at the center of the posted dangerous waste site. The ten sampling locations will be appropriately marked (Figure 2) and if necessary, the pit diameter will be enlarged to facilitate sampling. Sample depths within reconstructed crater (Figure 2, shaded area) are based upon reconstructed crater.

5.2 SUBTASK 1B - SAMPLING

Engineering support personnel will use hand tools to obtain soil samples in accordance with information provided in Figure 2. All samples will be packaged, handled, and shipped in accordance with WHC (1988).

6.0 LABORATORY ANALYSIS

Samples collected for chemical analysis will be analyzed utilizing SW-846 methods (EPA 1986) and approved EPA 300 series methods (EPA 1983). The unleaded gasoline discussed in Section 3.0 will be identified as a Tentatively Identified Compound (TIC) by method 8270 (EPA 1986). The contaminants of concern and the methods used for testing are:

- Volatile organic analysis, method 8240
- Semivolatile organic analysis, method 8270
- Detonation residue, method 8330
- Anions, EPA 300.0
- Total nitrogen, EPA 353.1-2
- ICP metals, method 6010.

7.0 REGULATORY AND HANFORD SITE COMPLIANCE

Field quality control (QC) samples will be collected by the sampling scientist and documented in the sampling logbook in accordance with EII 1.5, "Field Logbooks" (WHC 1988). The following is a list of the field QC samples to be collected:

- One duplicate sample at center of pit (0 to 6 in. depth) for full analysis
- One equipment blank (clean silica sand) for full analysis
- One trip blank (clean silica sand) for VOA analysis only.

9.0 REFERENCES

DOE-RL, 1992, *200 West Ash Pit Demolition Site Closure Plan*, DOE/RL-92-54, U.S. Department of Energy, Richland Operations Office, Richland, Washington.

DOE-RL, 1993, *Hanford Site Background: Part 1, Soil Background for Nonradioactive Analytes*, DOE/RL-92-24, Rev. 1, U. S. Department of Energy, Richland Operations Office, Richland, Washington.

EPA, 1983, *Methods for Chemical Analysis of Water and Waste*, 600/4-79-020, U.S. Environmental Protection Agency, Washington, D.C.

EPA, 1986, as amended, *Test Methods for Evaluating Solid Waste: Physical/ Chemical Methods*, SW-846, 3rd Edition, U.S. Environmental Protection Agency, Washington, D.C.

WHC, 1988, *Environmental Investigations and Site Characterization Manual*, WHC-CM-7-7, Westinghouse Hanford Company, Richland, Washington.

WAC 173-340, "Model Toxics Control Act--Cleanup," *Washington Administrative Code*, as amended.

ATTACHMENT 1

METRIC CONVERSION CHART

The following conversion chart is provided to the reader as a tool to aid in conversion.

Into Metric Units

If You Know	*Multiply By*	*To Get*
Length		
inches	25.4	millimeters
inches	2.54	centimeters
feet	0.305	meters
yards	0.914	meters
miles	1.609	kilometers
Area		
sq. inches	6.452	sq. centimeters
sq. feet	0.093	sq. meters
sq. yards	0.836	sq. meters
sq. miles	2.6	sq. kilometers
acres	0.405	hectares
Mass (weight)		
ounces	28.35	grams
pounds	0.454	kilograms
short ton	0.907	metric ton
Volume		
teaspoons	5	milliliters
tablespoons	15	milliliters
fluid ounces	30	milliliters
cups	0.24	liters
pints	0.47	liters
quarts	0.95	liters
gallons	3.8	liters
cubic feet	0.028	cubic meters
cubic yards	0.765	cubic meters
Temperature		
Fahrenheit	subtract 32 then multiply by 5/9ths	Celsius

Out of Metric Units

If You Know	*Multiply By*	*To Get*
Length		
millimeters	0.039	inches
centimeters	0.394	inches
meters	3.281	feet
meters	1.094	yards
kilometers	0.621	miles
Area		
sq. centimeters	0.155	sq. inches
sq. meters	10.76	sq. feet
sq. meters	1.196	sq. yards
sq. kilometers	0.4	sq. miles
hectares	2.47	acres
Mass (weight)		
grams	0.035	ounces
kilograms	2.205	pounds
metric ton	1.102	short ton
Volume		
milliliters	0.033	fluid ounces
liters	2.1	pints
liters	1.057	quarts
liters	0.264	gallons
cubic meters	35.315	cubic feet
cubic meters	1.308	cubic yards
Temperature		
Celsius	multiply by 9/5ths, then add 32	Fahrenheit

THIS PAGE INTENTIONALLY
LEFT BLANK

DISTRIBUTION

Number of copies

OFFSITE

1 U.S. Environmental Protection Agency
Region 10
1200 Sixth Avenue
Seattle, Washington 98101
D. L. Duncan

1 U.S. Environmental Protection Agency
Region 10
712 Swift
Richland, Washington 99352
D. R. Einan

1 Washington State Department of Ecology
South Sound Center
99 South Sound
Lacey, Washington 98503
T. M. Michelena

1 Washington State Department of Ecology
South Sound Center
99 South Sound
Lacey, Washington 98503
T. M. Michelena (Ecology, Library)

1 Washington State Department of Ecology
Nuclear Waste Program
1315 West 4th
Kennewick, Washington 99336-6018
F. Ma

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

1 Nez Perce Indian Tribe
P.O. Box 365
Lapwai, Idaho 83540-0365
Ms. Donna Powaukee, NPTEC

1 Confederated Tribes of the
Umatilla Indian Reservation
P.O. Box 638
Pendleton, Oregon 97801
Mr. J. R. Wilkenson

ONSITE

4	U.S. Department of Energy, Richland Operations Office	
	E. D. MacAlister (2)	S7-55
	E. M. Mattlin	S7-54
	DOE-RL Public Reading Room	A1-65
1	Pacific Northwest Laboratory	
	Technical Library	K1-11
13	Westinghouse Hanford Company	
	R. E. Bolls	T3-04
	D. M. Korematsu-Olund	H6-23
	M. M. Owens	H6-31
	R. D. Pierce	T3-04
	S. M. Price	H6-23
	F. A. Ruck III	H6-23
	B. D. Williamson	B3-15
	Central Files	L8-04
	DMKO/LB	H6-23
	EPIC (3)	H6-08
	OSTI	L8-07
1	MACTEC	
	GSSC (1)	A4-35

ONSITE

4	U.S. Department of Energy, Richland Operations Office	
	E. D. MacAlister (2)	S7-55
	E. M. Mattlin	S7-54
	DOE-RL Public Reading Room	A1-65
1	Pacific Northwest Laboratory	
	Technical Library	K1-11
13	Westinghouse Hanford Company	
	R. E. Bolls	T3-04
	D. M. Korematsu-Olund	H6-23
	M. M. Owens	H6-31
	R. D. Pierce	T3-04
	S. M. Price	H6-23
	F. A. Ruck III	H6-23
	B. D. Williamson	B3-15
	Central Files	L8-04
	DMKO/LB	H6-23
	EPIC (3)	H6-08
	OSTI	L8-07
1	MACTEC	
	GSSC (1)	A4-35

THIS PAGE INTENTIONALLY
LEFT BLANK