

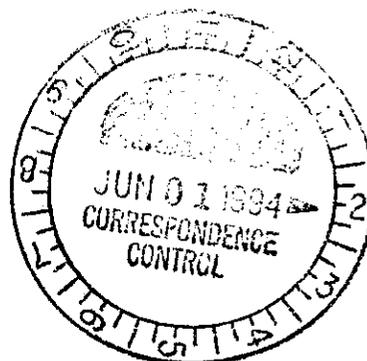


### Department of Energy

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

MAY 20 1994

94-RPS-216



Mr. David C. Nylander  
Nuclear Waste Program  
State of Washington  
Department of Ecology  
7601 West Clearwater, Suite 102  
Kennewick, Washington 99336

Dear Mr. Nylander:

#### PROPOSAL TO REMOVE EQUIPMENT FROM THE SIMULATED HIGH-LEVEL WASTE SLURRY TREATMENT/STORAGE UNIT (TSD: TS-3-4)

The U.S. Department of Energy, Richland Operations Office (RL) wishes to proceed with the removal of legacy processing equipment at the Pacific Northwest Laboratory (PNL) co-operated Simulated High-Level Waste Slurry Treatment/Storage (SHLWS T/S) Unit located in the 3000 Area prior to the approval of the Closure Plan by your Department. The accelerated removal of the equipment will facilitate the soil sampling which will be specified in the Closure Plan. This soil sampling is expected to occur in the July/August 1994 time-frame. This proposal has been discussed with Ms. Greta P. Davis of your staff at the April 14, 1994, Unit Managers' meeting. The itemized equipment and proposed removal/decontamination actions are listed below.

#### Item                      Removal/Decontamination Actions

Pallets

One hundred and two (102) pallets are currently located in the treatment and southeast storage areas. The fifty-five (55) pallets in the southeast area were used for barrelled SHLWS, prior to and after grouting. Pallets in the treatment area were used to store barrels of grouted material until they were shipped for disposal. Pallets evidencing only a rust ring will be disposed of as non-regulated solid waste. If pallets show any discoloration other than a rust ring, the discolored portions will be cut out and managed as dangerous waste, or the entire pallet will be cut up and managed as dangerous waste. The dangerous waste will be transported to an appropriate Resource Conservation and Recovery Act (RCRA) permitted Treatment, Storage and Disposal (TSD) Facility. Parts of the pallet showing no discoloration will be disposed of as solid waste in accordance with local, state and federal regulations.

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Tables

The two (2) tables are located within the 90-day-or-less accumulation and treatment areas. They were used primarily as working tables to record data, to maintain an inventory of container labeling supplies, and to prepare labels. The metal table in the treatment area was also used as a work table to facilitate use of the air driven pumps, motors, and agitators. The tables did not have any contact with dangerous waste or hazardous materials at the Unit. The steel table at the treatment site will be excessed, and the small wooden/metal table at the 90-day-or-less accumulation area will be disposed of as solid waste in accordance with local, state and federal regulations.

Air Hose

Several lengths of air compressor hose are located in the treatment area. The hose supplied air to the grout-mixing motors and pumps used to transfer neutralizing solution (NaOH) to the grout material and did not come into contact with the dangerous waste or hazardous materials. It will be disposed of as solid waste in accordance with local, state and federal regulations.

Mixing Motors

Three (3) mixing motors and agitators are located in the treatment area. They contain only residue of the grouted waste. The grout was not designated as dangerous waste and therefore the mixing motors and agitators will be disposed of as solid waste in accordance with local, state and federal regulations.

Small Tools

Small implements such as scoops, screw drivers, hand brooms, and three small pumps used for transferring NaOH will be disposed of as solid waste in accordance with local, state and federal regulations.

Drip Trays

Five (5) stainless steel drip trays are located in the treatment area. They will be washed with a non-phosphorous detergent and rinsed with deionized water. The rinsate will be collected, sampled, and analyzed for heavy metals by procedures 6010, 7421 (lead), 7471 (mercury), and screened for total activity. If the rinsate is determined to be non-dangerous, the drip trays will be retained for use as a secondary containment system or disposed of as solid waste in accordance with local, state and federal regulations. If the rinsate is determined to be dangerous, the trays will be washed and rinsed a second time. If the second rinsate is designated as dangerous waste by procedure 6010, the trays will be managed as dangerous waste or the cycle of decontamination and analysis of rinsate repeated until the rinsate is determined to be non-dangerous. Any dangerous waste will be transported to an appropriate RCRA TSD Facility.

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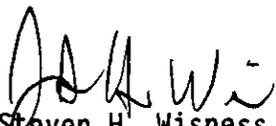
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In accordance with the U.S. Department of Energy requirements, all samples/material/equipment removed from the Unit will be field-surveyed for detection of any radioactive contamination. Any samples/material/equipment showing evidence of radioactive contamination will be disposed of as low-level or radioactive mixed waste as appropriate. After the completion of the removal actions described in this letter, there will be no other equipment remaining at the Unit.

We look forward to your timely response to this proposal. If you have any questions on the above information, please contact Mr. R. N. Krekel, RL, at (509) 376-4264, or Mr. H. W. Slater, PNL, at (509) 376-0575.

Sincerely,

  
Steven H. Wisness, Acting Program Manager  
Office of Environmental Assurance,  
Permits and Policy

EAP:RNK

cc: Administrative Records, H6-08  
B. A. Austin, WHC  
G. P. Davis, Ecology  
D. L. Duncan, EPA  
M. N. Jaraysi, Ecology  
F. A. Ruck, WHC  
B. D. Shipp, PNL  
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Subject: PROPOSAL TO REMOVE EQUIPMENT FROM THE SIMULATED HIGH-LEVEL WASTE  
SLURRY TREATMENT/STORAGE UNIT (TSD: TS-3-4)

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