



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

1315 W. 4th Avenue • Kennewick, Washington 99336-6018 • (509) 735-7581

July 2, 1997

Ms. Carol Sohn
U.S. Department of Energy
P.O. Box 550 MSIN: A5-15
Richland, WA 99352-0550



Dear Ms. Sohn:

Re: C-103 Organic Layer Removal Contingency Plan

During the monthly Tank Waste Remediation System (TWRS) Project Manager Meeting on May 22, 1997, the Washington State Department of Ecology (Ecology) requested and subsequently received a copy of the letter of instruction from Ron Gerton of the U.S. Department of Energy (USDOE) dated September 20, 1995, concerning the floating organic layer in tank C-103.

The letter describes the Chemical Reaction Sub (CRS) -Technical Advisory Panel's (Sub-TAP's) recommendation regarding removal of the organic layer. Specifically, the letter states the CRS "... suggested that the required actions for this removal be initiated immediately to ensure that the layer could be removed prior to an emergency condition created by the tank leaking." Ecology concurs with the description of the Sub-TAP's concern and with their recommendation.

In addition, in consideration of 40 CFR (Code of Federal Regulations) 265.198, by reference of Washington Administrative Code 173-303-400(3), Ecology has determined that the special requirements for the floating organic layer cannot be satisfied by performing interim stabilization of the tank's liquid contents with the floating organic layer in place. Specifically, Ecology has determined that none of the following special requirements are satisfied by performing interim stabilization with the floating organic layer in place:

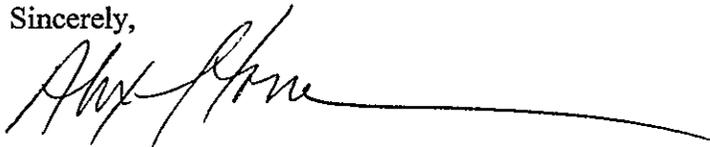
- 1) The waste is treated or mixed before or immediately after placement in the tank system;
- 2) The waste is stored or treated in such a way that it is protected from any material or conditions that may cause the waste to ignite or react;
or
- 3) The tank system is used solely for emergencies.

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Therefore, Ecology requests the submittal of an emergency contingency plan which would be implemented in the event tank C-103 is determined to be leaking. The contingency plan should include a detailed description of how the floating organic layer will be removed prior to interim stabilization of the remaining tank liquid wastes. The contingency plan should also identify provisions for management of the organic waste (i.e., transfer, storage and disposal of the waste). In addition, Ecology requests a copy of the safety assessment for these activities. Please submit these documents by August 15, 1997.

If you or your staff have any questions regarding this request, please call me at (509) 736-3018.

Sincerely,

A handwritten signature in black ink, appearing to read "Alex Stone", with a long horizontal line extending to the right.

Dr. Alex Stone
TWRS Safety Project Manager
Nuclear Waste Program

AH:rb

cc: Carolyn Haass, USDOE
Dennis Irby, USDOE
Doug Sherwood, EPA
Anthony Umek, FDH
Richard Belsey, HAB
Marilyn Reeves, HAB
Ralph Arcuro, DNFSB
Paul Gubanc, DNFSB
Billy Hudson, CRS
Mary Lou Blazek, Oregon
Administrative Record, TWRS