



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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

March 9, 1998

Mr. Glenn Goldberg
U. S. Department of Energy
P. O. Box 550, MSIN: H0-12
Richland, WA 99352



Dear Mr. Goldberg:

Re: Second Notice of Deficiency 100-D Ponds Closure Plan, Revision 1, Draft B, (dated December 1997, received December 30, 1997)

48583

This letter transmits the Washington State Department of Ecology's (Ecology) Second Notice of Deficiency (NOD) on the 100-D Ponds Closure Plan, Revision 1, Draft B (dated December 1997). The deficiencies were generated during a review of the closure plan's compliance with the applicable facility standards in the Dangerous Waste Regulations (WAC 173-303). The U. S. Department of Energy is expected to submit a NOD response table within 30-days of receipt of this letter.

If you have any questions or need clarification on any of Ecology's comments, please feel free to call me at (509) 736-3036.

Sincerely,

Keith K. Holliday
100-D Area Project Manager
Nuclear Waste Program

KH:skr
Enclosure (1)

cc: Jeff R. James, BHI
Scott W. Petersen, CHI
Administrative Record: 100-D Ponds

100-D Ponds Closure Plan (DOE/RL-92-71 Rev. 1, Draft B)
Second Notice of Deficiency
March 9, 1998

Number

Deficiency

1. Page 5-4, section 5.3.2, references to "MTCA B" should be changed to "MTCA method B." This correction needs to be made throughout the document.
2. Page 6-1, section 6.2, cite and quote (b) of WAC 173-303-610(2). It is misleading to cite 173-303-610(2)(a) as the performance standard, then conclude in section 6.3 100-D Ponds is compliant with WAC 173-303-610(2)(b).
3. Page A-9, section A3.3.1, sentence states, "If the data fail any of the tests in steps 3 through 5, the verification data fail the Ecology test." Only 4 steps precede this sentence, please list the fifth step or correct this sentence.
4. Page A-11, section A3.3.4, first paragraph, the third sentence should be "In an effort to integrate RCRA and CERCLA, the values in Table A-3 reflect the available cleanup limits agreed to by the Tri-Parties in the *Remedial Design Report/Remedial Action Work Plan for the 100 Area* (DOE/RL-96-17 Rev. 0).