



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

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APR 27 1998

Mr. Steve M. Alexander
Perimeter Areas Section Manager
Nuclear Waste Program
State of Washington
Department of Ecology
1315 West 4th Avenue
Kennewick, Washington 99336-6018

Dear Mr. Alexander:

**TRANSMITTAL OF THE D-PONDS CLOSURE PLAN, REVISION 2, DOE/RL-92-71, AND
RESPONSES TO STATE OF WASHINGTON DEPARTMENT OF ECOLOGY (ECOLOGY)
COMMENTS**

Attached are the responses to comments from Mr. Keith K. Holliday, of your staff, in a letter, "Second Notice of Deficiency 100-D Ponds Closure Plan, Revision 1, Draft B, dated March 9, 1998. All of the Ecology comments have been incorporated into the closure plan, and five copies of the final version (Rev. 2) are attached for your review and approval. This closure plan is scheduled to be incorporated into the upcoming Modification D of the Hanford Facility Wide Dangerous Waste Permit.

This closure plan presents the 100-D Ponds as a clean closure surface impoundment pursuant to Washington Administrative Code 173-303-610. In support of this position, Appendix A to the closure plan presents the results of verification sampling conducted in August 1996, after the U.S. Department of Energy, Richland Operations Office voluntary cleanup of the ponds. Appendix B is a discussion of possible impacts to the subsurface resulting from dangerous waste disposal activities.

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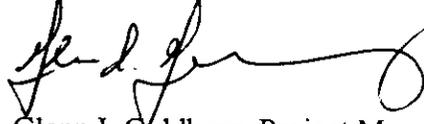
Mr. Steve M. Alexander

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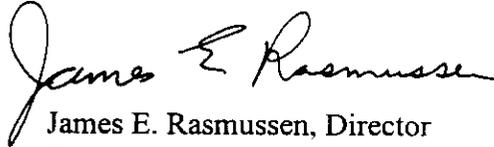
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If you have any questions, please contact Ms. Ellen Mattlin of the Environmental Assurance, Permits, and Policy Division at 376-2385 or Mr. Goldberg at 376-9552.

Sincerely,



Glenn I. Goldberg, Project Manager
Remedial Actions Project



James E. Rasmussen, Director
Environmental Assurance, Permits,
and Policy Division

RAP:GIG

Attachments

cc w/attachs:

K. K. Holliday, Ecology (5)

cc w/o attachs:

J. W. Badden, CHI

C. E. Corriveau, BHI

L. J. Cusak, Ecology

S. W. Petersen, CHI

S. M. Price, FDH

G. S. Robinson, BHI

R. T. Swenson, BHI

J. G. Woolard, BHI

ENCLOSURE #1

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**100-D PONDS CLOSURE PLAN REVISION 1
NOTICE OF DEFICIENCY RESPONSE TABLE**

<u>Number</u>	<u>Comments/Responses</u>
1.	<p>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.</p> <p>REPOSE: The requested change will be made.</p>
2.	<p>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).</p> <p>REPOSE: Sections 6.2 and 6.3 will be combined into one section titled “Closure Performance Standards,” and will be rewritten for clarity.</p>
3.	<p>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.</p> <p>REPOSE: The sentence will be changed to refer to steps 2 through 4.</p>
4.	<p>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 <i>Remedial Design Report/Remedial Action Work Plan for the 100 Area</i> (DOE/RL-96-17 Rev. 0).</p> <p>REPOSE: The requested change will be made.</p>

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ENCLOSURE #2

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