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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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January 13, 1999

Mr. James E. Rasmussen
U.S. Department of Energy
P.O. Box 550, MSIN: A5-15
Richland, WA 99352-0550



Dear Mr. Rasmussen:

Re: Equipment Washing Policy

A meeting was held on October 28, 1998, between the U.S. Department of Energy, Richland Operations Office (USDOE) and the Washington State Department of Ecology (Ecology) to discuss the regulatory status of discharges related to equipment washing. As a result of that meeting, Ecology committed to clarifying the status of these discharges.

A number of different situations can arise and several regulations must be considered in any policy on equipment washing. The following applies to equipment washing discharges to the soil using raw Columbia River water or potable water (with no additives) on the Hanford Site.

Discharges resulting from the routine washing of uncontaminated equipment (i.e., equipment that has not entered any contaminated areas or contacted contaminated material) are included under maintenance or construction discharges in State Waste Discharge Permit ST 4508. Permit condition S2.B requires appropriate Best Management Practices (BMPs) to be followed for uncontaminated equipment washdown activities. The required BMPs are described in the approved plan, *Pollution Prevention and Best Management Practices Plan for State Waste Discharge Permits ST 4508 and ST 4509 (DOE/RL-97-67, Rev. 2)*. 50047

For activities related to a clean up on a Comprehensive Environmental Response Compensation and Liability Act (CERCLA) or a Model Toxics Control Act (MTCA) site, decontamination of equipment should follow the approved documentation (e.g., investigation derived waste strategy, record of decision, or approved procedures). For activities related to clean up on a site regulated under Chapter 173-303, Washington Administrative Code (WAC), decontamination of equipment should be regulated under the approved work plan documentation (e.g., closure plan, sampling and analysis plan, approved procedures).

Normal construction activities, such as installation of utility lines, sometimes encounter contaminated areas. The construction activities are not related to a CERCLA clean up or a closure or corrective action under WAC 173-303. If the material encountered is suspected to be a dangerous or mixed waste, the Environmental Protection Agency (EPA) Area of



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Contamination Policy would apply. Developed in 1992, this policy allows contaminated material to be returned to the excavated hole as long as the soil does not leave the area of contamination. Excavation of contaminated material during construction is not considered to be the generation of a waste, and generator requirements do not apply to the soil. This policy also would apply to surface stabilization activities at Hanford, because surface stabilization is a temporary measure to prevent the spread of contamination and is not intended to be a clean-up activity.

The EPA Area of Contamination Policy does not address decontamination of equipment. Prevention of the spread of contamination should always be the highest priority when decontaminating equipment. Activities inside and outside of known surface contamination zones can result in generation of material suspected or known to be contaminated (e.g., drill cuttings, purgewater). Wastewater generated from decontamination of equipment used in these activities shall be managed in accordance with applicable regulations or other agreements (e.g., Purgewater Agreement). The purpose of collection of the washwater is to prevent the spread of contamination to uncontaminated areas.

Ecology understands the difficulties in applying a general policy to all circumstances that may be encountered during field operations. Therefore, responsible Project Managers may, at their discretion, evaluate exceptions on a case by case basis. Deviations from this policy should be documented by approval letter.

If you or your staff have any questions about this letter, please contact me at (509) 736-3038 or Moses Jaraysi at (509) 736-3016.

Sincerely,



Laura J. Cusack, PE, Project Management Section Manager
Nuclear Waste Program

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Central Files: RCRA/CERCLA Integration**