



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

05-AMCP-0048

NOV 18 2004

Mr. Michael A. Wilson, Program Manager
Nuclear Waste Program
State of Washington
Department of Ecology
3100 Port of Benton Boulevard
Richland, Washington 99352

RECEIVED
NOV 24 2004

EDMC

Dear Mr. Wilson:

**RESOURCE CONSERVATION AND RECOVERY ACT (RCRA) CLOSURE
CERTIFICATION FOR THE PLUTONIUM FINISHING PLANT (PFP) TREATMENT UNIT
GLOVEBOX HA-20MB**

Enclosed for the State of Washington Department of Ecology (Ecology) acceptance is the PFP Treatment Unit Glovebox HA-20MB (HA-20MB) Closure Certifications: Owner/Co-Operator Closure Certification by U.S. Department of Energy, Richland Operations Office (RL), Co-Operator Certification by Fluor Hanford, Inc., (Enclosure 1) and the Professional Engineer Closure Certification prepared by Phillip C. Ohl, Vista Engineering Technologies, L.L.C., Kennewick, Washington (Enclosure 2).

Mixed wastes, including plutonium-bearing sand, slag and crucible (SS&C) residues were immobilized in the HA-20MB glovebox. The SS&C residues, in a solid physical state, were processed by mixing with water and cement, and sealed into closed containers. All of the treated residues and equipment have been removed from the glovebox.

The closure activities were performed in accordance with the approved closure plan and are complete. The closure certifications were prepared in accordance with Washington Administrative Code 173-303-610 and the approved RCRA Closure Plan, Plutonium Finishing Plant Treatment Unit Glovebox HA-20MB, DOE/RL-2003-32, Revision 0. Physical closure activities for this unit were completed in September 2004. Ecology acceptance of the enclosed closure certifications will grant PFP HA-20MB clean closure.

Michael A. Wilson
05-AMCP-0048

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If you have questions, please contact me, or your staff may contact Matt McCormick, Assistant Manager for Central Plateau, on (509) 373-9971 or Joel Hebdon, Director, Office of Environmental Services, on (509) 376-6657.

Sincerely,



Keith A. Klein
Manager

AMCP:EMM

Enclosures: (2)

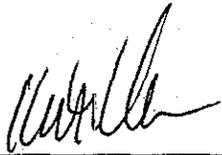
cc w/encls:

Administrative Record
J. M. Ayres, Ecology
F. W. Bond, Ecology
N. Ceto, EPA
R. H. Gurske, DFSH
K. A. Hadley, FHI
S. Harris, CTUIR
R. Jim, YN
P. Sobotta, NPT
Environmental Portal, LMSI
Ecology Library, Kennewick

ENCLOSURE 1

**CLOSURE CERTIFICATION
FOR
PLUTONIUM FINISHING PLANT
TREATMENT UNIT GLOVEBOX HA-20MB**

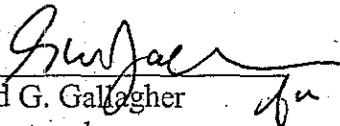
We, the undersigned, hereby certify that Plutonium Finishing Plant Treatment Unit Glovebox HA-20MB closure activities were performed in accordance with the specifications in the approved Closure Plan.



Owner/Operator
Keith A. Klein, Manager
U.S. Department of Energy
Richland Operations Office

11/17/07

Date



Ronald G. Gallagher
President and
Chief Executive Officer
Fluor Hanford, Inc.

10/26/04

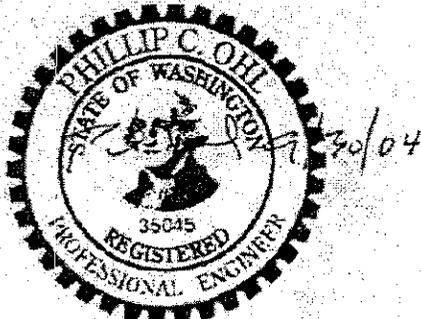
Date

ENCLOSURE 2

**PROFESSIONAL ENGINEER'S CERTIFICATION STATEMENT
PFP GLOVEBOX HA-20MB**

I, the undersigned, an independent registered Professional Engineer, hereby certify that, to the best of my knowledge, all Glovebox HA-20 MB closure activities were performed as specified in the approved *Hanford Facility Dangerous Waste Closure Plan, Plutonium Finishing Plant Treatment Unit Glovebox HA-20MB*, DOE/RL-2003-32, Revision 0. This certification is based on visual inspection of the glovebox in accordance with the closure performance standards referenced in the approved closure plan and on review of the applicable Log Book, Operating Procedures, and Clean Closure Checklist as described in the attached Specifications and Limitations of Professional Engineer's Certification.

PC OHL 9/2/04
Phillip C. OHL, PE
Washington State PE License No. 35045
Vista Engineering Technologies, LLC
Kennewick, Washington 99336



EXPIRES: 3/29/05

**SPECIFICATIONS AND LIMITATIONS OF
PROFESSIONAL ENGINEER'S CERTIFICATION STATEMENT**

PPF GLOVEBOX HA-20MB

September 30, 2004

Inspections Performed

September 23, 2004: Accompanied by Gary Haynes (Superintendent), Brian Ennen (NCO), and Mike Minette (Project Manager)

September 27, 2004: Accompanied by Brian Ennen (NCO), Rick Oldham (Environmental Engineer), and Mike Minette (Project Manager)

Documents Reviewed

1. *Hanford Facility Dangerous Waste Closure Plan, Plutonium Finishing Plant Treatment Unit Glovebox HA-20 MB*, DOE/RL-2003-32, Rev. 0, United States Department of Energy, Richland, Washington, March 2004.
2. *Closure and Post-Closure*, WAC 173-303-610, Washington State Legislature, Olympia, Washington.
3. *Treatment Standards for Hazardous Debris*, Title 40 Code of Federal Regulations, Paragraph 268.45, Table 1, Definition of "Clean Debris Surface," July 2003.
4. PFP Technical Procedure, General Use, *Seal Out*, ZSP-003, Rev. C, Fluor Hanford, Inc., Richland, Washington, September 2004.
5. PFP Technical Procedure, Continuous Use, *Visual Examination Technique for PFP Debris Waste*, ZO-170-057, Rev. B, Fluor Hanford, Inc., Richland, Washington, May 2004.
6. Approval Letter 0402700, Mr. Rick Bond (Ecology) to Mrs. Stacy Charboneau (DOE-RL), Washington State Department of Ecology, Richland, Washington, August 2004.
7. Log Book, *Glovebox HA-20MB TSD Closure*, Fluor Hanford, Inc., Richland, Washington, September 2004.
8. Checklist, *HA-20MB Clean Closure – Clean Debris Surface*, Fluor Hanford, Inc., Richland, Washington, September 2004.

Results

During the months of August and September 2004, PFP operators removed equipment and cleaned the surfaces of HA-20MB with wire brushes, wire brush wheels, palm sanders, and wet (water) rags. On September 23, 2004 the center section of the glovebox was inspected and found to have been properly cleaned to bare metal on the bottom and sides in accordance with the visual standards identified in the approved closure plan. During this same inspection, the airlock was found to be cleaned to the painted surface in accordance with the visual standards identified in the

approved closure plan. Subsequently, on September 27, 2004 gloves and tools obscuring the North and South ends of the glovebox were moved to the center section and the North and South ends were inspected and found to have been properly cleaned to bare metal on the bottom and sides in accordance with the visual standards identified in the approved closure plan. There is no remaining visual evidence of SS&C residue inside the glovebox.

Limitations

This certification is limited to visual verification of glovebox HA-20MB Clean Debris Surface as described in 40 CFR 268.45, Table 1, and cited in the approved Closure Performance Standard, Section 3.1.2, *Visual Standard of Clean Debris Surface*. This certification did not review alternative closure methods or alternative closure standards. Verification of proper removal of hazardous materials from the glovebox was performed by review of the Log Book and review of PFP Procedure ZSP-003. Seal out activities were not witnessed in person and training records of operators performing the seal out activities were not verified.