



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

0055432

01-RCA-411

SEP 5 2001

Mr. F. C. Jamison, Manager
Waste Management Projects
State of Washington
Department of Ecology
1315 W. Fourth Avenue
Kennewick, Washington 99336

RECEIVED
OCT 03 2001

EDMC

Dear Mr. Jamison:

CLOSURE CERTIFICATION FOR THE 616 NONRADIOACTIVE DANGEROUS WASTE STORAGE FACILITY (616 NRDWSF) (S-6-1)

Enclosed for State of Washington Department of Ecology (Ecology) acceptance are completed 616 NRDWSF Closure Certifications: U.S. Department of Energy, Richland Operations Office (RL) (Owner/Operator) and Fluor Hanford, Inc., (Co-operator) Closure Certification (Enclosure 1) and Professional Engineer (PE) Closure Certification prepared by David Fort, Fluor Federal Services, Inc., Richland, Washington (Enclosure 2).

These closure certifications were prepared in accordance with Washington Administrative Code (WAC) 173-303-610 and the approved 616 NRDWSF Closure Plan (Chapter 11.0 of the Hanford Facility Dangerous Waste Permit Application, 616 Nonradioactive Dangerous Waste Storage Facility [DOE/RL-89-03, Rev. 2A]). These certifications attest that 616 NRDWSF closure activities are complete and were performed in accordance with the approved closure plan. This closure plan is considered to be approved by Ecology because Ecology accepted the revised plan in a letter dated September 28, 1999. The plan underwent public review without comment, and Ecology issued the plan as a portion of Revision 7 of the Hanford Facility Resource Conservation and Recovery Act Permit (HF RCRA Permit).

These closure certifications, along with closure documentation previously provided to Ecology, verify that unit soils and structures contain no contamination above clean closure criteria of the approved closure plan, WAC 173-303-610, and the HF RCRA Permit, Section II.K. Therefore, RL requests that Ecology accept the enclosed closure certifications, thereby granting clean closure of this unit.

Ecology is herein notified that because no known release of hazardous substances occurred from this unit to other than waste storage area containment structures that were decontaminated during closure, the corrective action requirements of the HF RCRA Permit, Revision 6, Dangerous Waste Portion, Section II.Y.2.c, are not applicable.

Mr. F. C. Jamison
01-RCA-411

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If you have questions or need further information please contact Ellen Mattlin, of my staff, on (509) 376-2385 or Greg Sinton, Waste Management Division, on (509) 373-7939.

Sincerely,



Joel Hebdon, Director
Regulatory Compliance and Analysis Division

RCA:AET

Enclosures

1. Owner/Operator closure certification
2. PE closure certification statement and report

cc w/encls:

Administrative Record
Ecology Library, Kennewick
Environmental Portal, LMSI
Hanford Facility Operating Record
G. P. Davis, Ecology
R. Gay, CTUIR
R. H. Gurske, FHI
R. Jim, YN
S. N. Luke, FHI
D. R. Sherwood, EPA
P. Sobotta, NPT
S. A. Thomson, FHI

Enclosure 1

**Closure Certification For
616 Nonradioactive Dangerous Waste Storage Facility Closure**

**CLOSURE CERTIFICATION
FOR
616 NONRADIOACTIVE DANGEROUS WASTE STORAGE FACILITY**

We, the undersigned, hereby certify that 616 Nonradioactive Dangerous Waste Storage Facility 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

9/5/01

Date



Co-operator
E. Keith Thomson
President and
Chief Executive Officer
Fluor Hanford, Inc.

8/7/01

Date

Enclosure 2

**Professional Engineer Certification Statement and Specifications and Limits of PE Certification
616 Nonradioactive Dangerous Waste Storage Facility**

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

616 NON-RADIOACTIVE DANGEROUS WASTE STORAGE FACILITY

Chapter 11 of the "Hanford Facility Dangerous Waste Permit Application" (DOE/RL-89-03, Rev. 2A) gives the closure requirements for the 616 Non-Radioactive Dangerous Waste Storage Facility (NRDWSF). This closure plan is considered approved by the Washington State Department of Ecology (Ecology) through Ecology acceptance of the plan as complete in letters dated September 2, 1999 and September-28, 1999, and because the plan underwent public review without comment. Closure activities based on the aforementioned document have been completed with the exception and clarification noted below.

Periodic site visits and document reviews were conducted to observe and document the closure activities. Field trip observations were recorded in a logbook.

It was observed that each inspection activity was recorded on a "Decontamination and Inspection Checklist for 616 Non-Radioactive Dangerous Waste Storage Facility Closure Activities." Laboratory analyses of the soil samples taken from the french drain were fully documented and validated. With the exception and clarification noted below, all closure activities were performed in accordance with the current closure documents. The periodic inspections, including the final inspection, revealed no other discrepancies.

The noted exception is:

The analyte Bis (2-ethylhexyl) phosphoric acid (D2EHPA), CASRN 298-07-7, listed in Table 11-1 of the closure plan, was omitted from the analytes investigated in the laboratory analysis of the soil samples.

The noted clarification is:

Not all storage building components were removed or decontaminated as suggested in the closure plan, Section 11.1.2, second and third bullets (Chapter 11, of DOE/RL-89-03, Rev. 2A). In particular, the sink cabinet in the Package and Sampling Room and the battery charger in the Packaging Material and Handling Equipment Area. Note that neither of these storage building components were identified in Section 11.1.2.3.3 as items to be decontaminated, therefore there is no exception to the closure plan.

The attached certification statement was prepared in accordance with WAC 173-303-610(6) to independently certify that all physical closure activities required to complete clean closure were performed in accordance with the approved closure plan with the above noted exception and clarification. The PE statement is not intended to certify the extent to which the overall objectives of the closure plan have been met.

**PROFESSIONAL ENGINEER'S CERTIFICATION STATEMENT
616 NON-RADIOACTIVE DANGEROUS WASTE STORAGE FACILITY**

I, the undersigned, an independent registered Professional Engineer, hereby certify that I have reviewed the closure plan, and other relevant closure documents, for the 616 Non-Radioactive Dangerous Waste Storage Facility and, to the best of my knowledge, all closure activities were performed in accordance with the approved closure documents. This certification is based on review of documents and activities as described in the attached Specifications and Limitations of Professional Engineer's Certification.


David Lyle Fort, P.E.
Washington #19859
Fluor Federal Services, Inc.

