STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
1315 W. 4th Avenue • Kennewick, Washington 99336-6018 • (509) 735 7581

December 13, 2001

Mr. Peter Knollmeyer
United States Department of Energy
P. O. Box 550; MSIN: A5-11
Richland, Washington 99352

Mr. Michael C. Hughes
Bechtel Hanford Incorporated
2250 George Washington Way; MSIN: H0-09
Richland, Washington 99352

Dear Messrs. Knollmeyer and Hughes:

Re: Approval for Stabilization of the Hexone Storage and Treatment Facility.

On April 25, 2000, the Washington State Department of Ecology (Ecology) conducted an inspection of the Hexone Storage and Treatment Facility (HSTF). The HSTF is comprised of two 24,500 gallon capacity underground hazardous waste storage tanks and above ground ancillary equipment. The HSTF has been managed by the United States Department of Energy (USDOE) and Bechtel Hanford, Incorporated (BHI) as an unfit-for-use tank system per Federal Code of Federal Regulations (CFR), 40 CFR 265.196.

On May 26, 2000 Ecology issued a letter to the USDOE documenting findings from the April 25, 2000 inspection and actions required to stabilize the HSTF. Throughout 2000 and 2001 Ecology, the USDOE and BHI representatives met to gain accurate knowledge of the contents of the HSTF and determine the most practical manner to stabilize the HSTF. Sampling and analysis of the HSTF revealed the tanks contained a heel of approximately 130 gallons each of a mildly acidic tar-like material which designated as F003, D001, WT02 and W001 hazardous waste.

On November 21, 2001 the USDOE issued a letter to Ecology proposing that the two hexone tanks be filled in-place with grout to achieve stabilization of the HSTF. Ecology believes this action will satisfy the requirements of its May 26, 2000 letter subject to the conditions listed below:

1. Grouting of each hexone tank shall occur in two pours. The first pour shall cover the heel of waste in each tank with a distinctly colored grout. The first pour shall be allowed to solidify sufficient to prevent intermixing with the second pour (i.e. introduce a cold joint between pours) after which the second pour shall complete filling of the tanks' void space. The second pour shall consist of uncolored grout which, in concert with the cold joint created between layers, will provide a clear demarcation between grout layers. The purpose of the coloring and two stage grouting process is to facilitate closure of the HSTF by separating the mixed waste contents (tank bottom containing the heel and colored grout) from non-mixed waste debris (upper tank and uncolored grout).

2. Filling the HSTF tanks with grout will serve to stabilize them; however, Ecology considers the HSTF an active RCRA storage facility subject to closure per WAC 173-303-610. Therefore, a revised closure plan for the HSTF must be prepared for inclusion within future modifications to the Hanford RCRA Site-Wide Permit. Please contact Ms. Laura Ruud at (509) 736-5715 regarding scheduling for inclusion of a revised HSTF closure plan into the Hanford RCRA Site-Wide Permit.

Successful completion of item #1 above will satisfy the requirements of Ecology's May 26, 2000 letter. Ecology requests notification by the USDOE upon completion of action #1 above. Upon verification that action #1 has been completed, Ecology will close-out the April 2000 inspection.

If you have any questions regarding this letter, please contact me at (509) 736-3031.

Sincerely,

Bob Wilson

Bob Wilson, Compliance Inspector
Nuclear Waste Program

cc: Craig Cameron, EPA
Julie Atwood, BHI
Ken Niles, OOE
Administrative Record: HSTF