

0067925

**Isom, Debra A (Debbi)**

**From:** Wireman, Ginger [GWIR461@ECY.WA.GOV]  
**Sent:** Tuesday, November 29, 2005 10:47 AM  
**To:** HANFORD-INFO@LISTSERV.WA.GOV  
**Subject:** 324 Building Closure and Change Control Form for TPA Milestone 89-04-01

### Public Comment Requested on Noncompliant Storage Facility Draft Closure Plan

The Washington State Department of Ecology (Ecology) wants your input on a draft closure plan for the 324 Building Radiochemical Engineering Cells, High-Level Vault, Low-Level Vault, and Associated Areas Closure Plan, Revision 3 and Federal Facility Agreement and Consent Order Change Control Form, M-89-04-01.

The Hanford Site, located near Richland, Washington, is operated by the U.S. Department of Energy, Richland Operations Office. The 324 Building is located in the 300 Area of the Hanford Site. The 324 Building was constructed in the 1960s to support materials and chemical process research and development activities ranging from laboratory/bench-scale studies to full engineering-scale pilot plant demonstrations. In the mid-1990s, it was determined that dangerous waste and waste residues were being stored for more than 90 days in the 324 Building Radiochemical Engineering Cells (REC) and the High-Level Vault/Low-Level Vault (HLV/LLV) tanks without a permit as required by the *Washington State Dangerous Waste Regulations (WAC 173-303)* or the federal *Resource Conservation and Recovery Act of 1976 (RCRA)*. 67727

TPA Milestone M-89-00 requires that the non-permitted mixed waste units in the 324 building be closed by October 31, 2005. The closure plan governing that closure originally called for a clean closure of the facility through a combination of techniques. Cell liners and concrete were to be decontaminated to meet "Alternative Treatment Standards for Hazardous Debris". All in-cell waste, accessible piping, and eight tanks were to be removed. Integrity assessments were to be performed on the cells to verify soil and groundwater had not been contaminated by the TSD unit. In October 2001, the Parties signed a change request that required the demolition of the 324 building by September 30, 2010. The Parties subsequently agreed that it made more sense to achieve clean closure in 2010 when the building is demolished.

The path for closure and the performance standard was changed to performing "removal" instead of cleaning to meet the Debris Rule standard, "clean debris surface", for clean closure. Clean closure will be achieved by removing the mixed waste units during facility decommissioning and demolition activities. However, if clean closure is not possible, closure surveillance and maintenance activities will be implemented.

Tri-Party Agreement Milestone M-094-03 was established in April 2002 and requires complete disposition of the 324 Building by September 30, 2010. The Tri-Party Agreement Major Milestone M-89-00 workscope is a parallel activity with Interim Tri-Party Agreement M-094-03 workscope. Therefore the due date for M-89-00 is being changed from October 31, 2005 to September 30, 2010 to align with the M-094-03 due date.

Ecology invites public comments on this closure plan and the Change Control Form. The

comment period will run from January 2, 2006 through February 15, 2006. A public hearing is not planned at this time. To submit comments, get additional information, or to request a hearing, please contact Ginger Wireman, Ecology, Nuclear Waste Program via e-mail at [gwir461@ecy.wa.gov](mailto:gwir461@ecy.wa.gov) or call 509-372-7935.