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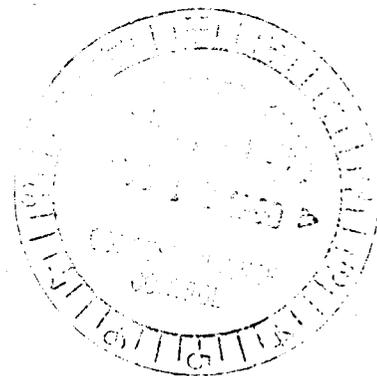
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AUG 3 1990

Mr. Timothy L. Nord
Hanford Project Manager
State of Washington
Department of Ecology
Mail Stop PV-11
Olympia, Washington 98504-8711

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Dear Mr. Nord:

201-C STRONTIUM SEMIWORKS, TANK 241-CX-70 REGULATORY STATUS

Reference: Letter, T. L. Nord, Ecology, to R. D. Izatt, DOE-RL and R. E. Lerch, WHC, "241-CX-70 Tank Regulatory Status," dated May 31, 1990.

In the referenced letter, you stated that it appeared appropriate to prioritize submittal of the closure plan for this unit with respect to the Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement). We believe it may be premature to prioritize closure at this time. This is based on: 1) the continuing characterization work at the Strontium Semiworks Decommissioning Project of which Tank 241-CX-70 is a part, and 2) the Tri-Party Agreement designation of the Strontium Semiworks Facility as part of the 200-SO-1 Operable Unit (which is currently not scheduled).

The Strontium Semiworks Decommissioning Project was started in 1984 and has been completed with the exception of characterization and interim waste removal, if required, of the three adjacent tanks; Tank 241-CX-71, Tank 241-CX-72 and Tank 241-CX-70.

Tank 241-CX-71 is a stainless steel tank approximately five feet in diameter by six feet high, containing limestone and sealed with a grout cap. It was originally used for neutralization of facility condensate and condenser cooling water prior to discharge to onsite cribs. Evidence exists that dangerous waste may be present in the tank. While the potential for that is not high, characterization of the waste is being done to verify its contents. The contents of the tank will be sampled in August 1990, in accordance with Westinghouse Hanford Company manual, WHC-CM-7-7, Environmental Investigation and Site Characterization. Characterization of the tank contents will be completed in December 1990. Preparation of a Dangerous Waste Part A Permit Application would begin at that time, if the characterization showed an indication of dangerous waste.

Tank 241-CX-72 was an experimental tank used to determine the results of self concentrating waste from pilot plant studies at the facility. It is a carbon steel tank approximately 4 feet in diameter by 35 feet tall set inside of a 6 feet diameter, 35 feet high caisson. The tank, including caisson is

AUG 10 1990
200

located 14 feet below grade. The tank contains about 8 feet of waste topped with 27 feet of grout. A radiological assessment, based on neutron and gamma radiation measurements in a dry well located on the circumference of the tank, has determined with a high degree of certainty that the tank contains transuranic waste. The confirmation of the presence of transuranic waste would require that waste be removed from the tank and properly dispositioned. Again, evidence exists that dangerous waste may be present within the tank. An engineering study performed by Westinghouse Hanford Company, WHC-SD-DD-ES-008, Recommendations for Sampling and Decommissioning of Tank 241-CX-72, which was previously provided to you, recommended a three phase approach: 1) removal of the majority of the grout layer, 2) sampling and analysis of the waste, and 3) retrieval of the waste material. This approach to tank remediation is the most expeditious and cost effective method of handling of the waste characterization and the eventual waste removal. The waste characterization is scheduled to be complete in January 1992. Preparation of a Dangerous Waste Part A Permit Application would begin at that time, if the characterization showed an indication of dangerous waste.

In addition, the project is part of the 200-SO-1 Operable Unit and listed in Appendix C of the Tri-Party Agreement. The lead regulatory agency has not been assigned and further characterization work would be managed under the authority of Resource Conservation and Recovery Act (RCRA) or Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). The remediation activities are scheduled by the Tri-Party Agreement to be prioritized in 1992. It is planned to request scheduling the activity to directly follow completion of interim waste removal in the Tank 241-CX-72 which is scheduled to be completed in 1993.

The required closure activities for these three tanks would then be coordinated with the cleanup of the 200-SO-1 Operable Unit. Therefore, it is proposed that the scheduling of the closure plan for Tank 241-CX-70 be postponed until the characterization of the remaining tanks at the Strontium Semiworks is complete.

Also, as you are aware, a Dangerous Waste Part A Permit Application for Tank 241-CX-70 was submitted on July 10, 1990. Since the waste contents of Tank 241-CX-70 are corrosive only, it is intended to pursue waste removal activities based on the definition of an Elementary Neutralization Unit, Washington State Dangerous Waste Regulation (WAC) 173-303-040(27). We propose that the tank be operated under the requirements of WAC 173-303-802(5), as this would allow the most expeditious path for neutralization of the waste, its removal, and proper disposal.

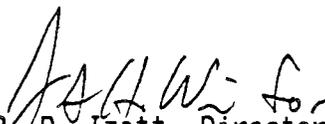
Mr. Timothy L. Nord

-3-

AUG 3 1990

Your agreement with these strategies is requested. If you have any questions regarding our proposal, please contact Mr. C. E. Clark of the U.S. Department of Energy, Richland Operations Office on (509) 373-9333 or Ms. C. J. Geier of Westinghouse Hanford Company on (509) 376-2237.

Sincerely,


R. D. Izatt, Director
Environmental Restoration Division
Richland Operations Office


R. E. Lerch, Manager
Environmental Division
Westinghouse Hanford Company

cc: P. T. Day, EPA
D. L. Duncan, EPA
~~R. E. Lerch, WHC~~

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Author U.S. Department of Energy R. D. Izatt/R. E. Lerch	Addressee Ecology--T. L. Nord	Correspondence No. Incoming 9003488
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