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Department of Energy

Richland Operations Office
P.O. Box 550
Richland, Washington 99352

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95-PCA-120

Mr. David L. Lundstrom
200 Area Section Manager
Nuclear Waste Program
State of Washington
Department of Ecology
1315 W. Fourth Avenue
Kennewick, Washington 99336-6018

Mr. Douglas R. Sherwood
Hanford Project Manager
U.S. Environmental Protection Agency
712 Swift Boulevard, Suite 5
Richland, Washington 99352

Dear Messrs. Lundstrom and Sherwood:

SUBMITTAL OF 218 E-8 BORROW PIT DEMOLITION SITE CLOSURE PLAN PAGE CHANGES (T-2-1) AND THE 200 WEST AREA ASH PIT DEMOLITION SITE CLOSURE PLAN PAGE CHANGES (T-2-2)

The enclosed 218 E-8 Borrow Pit Demolition Site Closure Plan page changes and the 200 West Area Ash Pit Demolition Site Closure Plan page changes are submitted by the U.S. Department of Energy, Richland Operations Office (RL), and the Westinghouse Hanford Company (WHC) in response to the State of Washington Department of Ecology (Ecology) letter from F. Ma, Ecology, to E. M. Mattlin, RL, under the subject "218 E-8 Borrow Pit Demolition Site Closure Plan (T-2-1) and 200 West Area Ash Pit Demolition Site Closure Plan (T-2-2)" and dated December 12, 1994. The Ecology letter requested that RL modify Section 6.3.2. in each closure plan, specifying that a second round of Data Quality Objective (DQO) meetings may be required to determine future sampling needs, if the initial sampling data indicates contamination by past demolition activities.

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Messrs Lundstrom and Sherwood
95-PCA-120

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Please incorporate the enclosed page changes into the copies of the 218-E-8 Borrow Pit Closure Plan, Revision 1, and the 200 West Area Ash Pit Demolition Site Closure Plan, Revision 1, transmitted on October 21, 1994, and October 6, 1994, respectively. Should you have any questions, please contact Ms. E. M. Mattlin, RL, on (509) 376-2385 or Mr. F. A. Ruck III, WHC, on (509) 376-9876.

Sincerely,



James E. Rasmussen, Acting Program Manager
Office of Environmental Assurance,
Permits, and Policy
DOE Richland Operations Office

EAP:EMM



William T. Dixon, Manager
Environmental Services
Westinghouse Hanford Company

Enclosures:

1. 218 E-8 Borrow Pit Closure Plan,
Revision 1, Page Changes
2. 200 West Ash Pit Closure Plan,
Revision 1, Page Changes

cc w/encl:

Admin. Record

EBMC, H6-08

J. Bartz, GSSC

B. Burke, CTUIR

D. Duncan, EPA

R. Jim, YIN

F. Ma, Ecology

T. Michelena, (Library) Ecology

D. Powaukee, NPT

F. Ruck, III, WHC

cc w/o encl:

W. Dixon, WHC

S. Price, WHC

6.2.3 Return Land to the Appearance and Use of Surrounding Land

In accordance with WAC 173-303-610(2)(a)(iii), the owner or operator of a TSD unit is required to close the unit in a manner that returns the land to the appearance and use of surrounding land areas to the degree possible given the nature of the previous dangerous waste activity.

When closure of the 218-E-8 Demolition Site is accomplished, the site will be returned to the appearance and continued use of the surrounding 200 East 218-E-8 Borrow Pit.

6.3 OVERVIEW OF CLOSURE ACTIVITIES

The activities presented in this section are divided into planning activities and physical activities.

6.3.1 Planning Activities

The DQO planning process was used to ensure that the performance standards are met to the satisfaction of all parties involved. This DQO process provided the framework for the SAP and defined the data needs and uses. The SAP provides the documentation of agreement and decisions regarding establishing and meeting the action levels for the 218-E-8 Demolition Site Closure (Appendix 7C).

6.3.2 Physical Activities

The general closure activities are as follows.

- Perform radiological survey (completed in 5/92).
- Collected soil samples from within the 218-E-8 Demolition Site. Sample locations and collection methods are discussed in Chapter 7.0, Section 7.2.3 and the SAP (Appendix 7C) (completed in 6/94).
- Analyze samples in accordance with EPA-approved procedures and evaluate results. Samples will be analyzed in an offsite laboratory capable of performing to EPA Analytical level III standards.
- Compare analytical results to action levels to determine the extent of contamination and to determine the presence or absence of contaminants.
- If contamination levels for all constituents of concern are below their action levels, the 218-E-8 Demolition Site will be clean closed.
- If contamination at the 218-E-8 Demolition Site is above the action level, a phase two investigation will be developed. The phase two

1 investigation will be developed in a subsequent DQO negotiation
2 process with all parties involved.
3

4 All equipment used in performing closure activities will be
5 decontaminated or disposed at a RCRA-compliant facility.
6

7 Closure activities will be monitored by an independent registered
8 professional engineer who will certify that closure activities were
9 accomplished in accordance with the specifications of the approved closure
10 plan.