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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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April 3, 1991



Mr. Steven H. Wisness
Hanford Project Manager
U.S. Department of Energy
P.O. Box 550
Richland, Washington 99352

Re: Notice of Deficiency for the 304 Concretion Facility Notice of Deficiency Response Table

Dear Mr. Wisness:

This letter transmits Ecology's comments on the 304 Concretion Facility Closure Plan Notice of Deficiency Response Table dated January 30, 1991. The information presented was reviewed for compliance with final facility status standards in the state Dangerous Waste Regulations (Chapter 173-303 WAC).

The areas of concern for this closure plan are as follows:

1. The level of detail is inadequate.
2. Proposals relating to closure standards will be impacted by a closure policy that is currently being developed by the Nuclear and Mixed Waste Management Program (N&MWMP).
3. The quality assurance and quality control provisions remain inadequate.
4. Controls for the health and safety hazards associated with radioactive contaminants are still not adequately addressed. Furthermore, it is unacceptable to omit cleanup of the radioactive constituents from these closure activities.

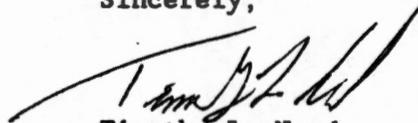


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Mr. Steven H. Wisness
April 3, 1991

USDOE/WHC must respond to these comments with a revised closure plan. However, because the revision will be affected by the N&MWP Closure Policy under development, the date for submittal will be transmitted to USDOE/WHC with the finalized policy. Should you have questions or concerns regarding this notice, please contact Ms. Megan Lerchen of my staff at (206) 438-3089.

Sincerely,



Timothy L. Nord
Hanford Project Manager

Enclosure

cc: P. Day - EPA, Richland
D. Duncan - EPA, Seattle
D. Nylander - Ecology, Kennewick
T. Michelena - Ecology, Olympia
~~P. Ven...~~

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DEPARTMENT OF ECOLOGY
 NOTICE OF DEFICIENCY FOR
 THE 304 CONCRETION FACILITY
 NOD RESPONSE TABLE OF JANUARY 1990
 April 3, 1991

The following comments correspond to the numbers from the 304 Concretion Facility Closure Plan NOD Response Table dated January, 1990. Underlined numbers signify changes made since the previous NOD. Proposals made in the following comments are accepted by Ecology:

2	3	5	7	8	9	10	<u>11</u>	12	<u>14</u>	15
19	22	26	<u>28</u>	29	<u>31</u>	33	34	36	39	41
<u>42</u>	43	44	45	46	47	48	49	51	52	53
55	56	<u>58</u>	59	61	63	64	<u>65</u>			

Proposals made in the following comments are accepted by Ecology pending our review of further information as proposed in the USDOE-RL/WHC responses:

1	6	13	16	18	23	24	25	30	<u>35</u>	37
40	54	62	65	67						

Proposals made in the following comments are not accepted by Ecology:

4	17	20	21	27	32	38	50	57	60	66
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4. USDOE/WHC Proposal: A number of proposals relating to closure standards are made.

Ecology Response: Ecology is developing a policy for soil closure standards. It is anticipated that this policy will impact the proposals made by USDOE/WHC. In keeping with the Tri-Party Agreement, an integral part of this policy will be the goal of only one remediation at any unit; i.e., it will not be acceptable to postpone any part of the closure activities to the 300-FF-3 Operable Unit response. This closure policy will be made available to USDOE/WHC as soon as possible.

17. USDOE/WHC Proposal: USDOE-RL/WHC discusses a closure strategy.

Ecology Response: The acceptability of this proposal will be dependent on conformance with the Ecology closure policy which is in development. See number 4 for details.

18. USDOE/WHC Proposal: Setting health-based standards for closure.

Ecology Response: The Ecology policy for closure will cover health-based standards. See number 4.

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Second NOD Response Table Comments
April 3, 1991

20. USDOE/WHC Proposal: Using TCLP to demonstrate that potentially contaminated concrete samples do not designate as dangerous waste.

Ecology Response: This approach seems reasonable but too narrow in scope; following the designation procedure delineated under WAC 173-303-070 will be acceptable. This may not be sufficient for clean closure, however, and it will be necessary to close in accordance with the N&MWMP closure policy under development. See number 4.

21. USDOE/WHC Proposal: Similar testing for asphalt as for concrete to demonstrate that it is not dangerous waste.

Ecology Response: This approach will be acceptable under the same caveats as for concrete. See number 20.

23. USDOE/WHC Proposal: Determination of area background is proposed at the surface, one foot, and two feet depths. It is stated that, "If general or source contamination exists, it would be from the past practice operations and not from operations conducted in the 304 Facility. The Tri-Party Agreement states source contamination will be evaluated and remediated under the CERCLA RI/FS process."

Ecology Response: It is not clear if this proposed background determination is to be used as part of the Hanford Site-Wide background study. If it is not, this should be clearly stated. If it is, this evaluation of the vadose zone background contaminant levels is too limited in scope. Because comparisons of contaminated vadose zone data to the 300 Area background data must be between the same soil horizons for this unit and others, the plan must be expanded to include deeper soil horizons. Refer to the Hanford Site-Wide soil background study for reference.

In the quoted statement, the first sentence is unsubstantiated and the second sentence is not in agreement with the general tenor of the Tri-Party Agreement and will not be in accordance with the closure policy under development by the N&MWMP. The quoted statement should be deleted.

25. USDOE/WHC Proposal: Inclusion of the proposed flowchart (Figure 6-1) and text (Section 6.2). There is no flowchart labelled Figure 6-1, however, the chart labelled GEN\122890-A appears to fulfill the same function and was assumed to be Figure 6-1.

Ecology Response: The flowchart is acceptable but will probably require some revision to accommodate the closure policy currently under development. The proposed text seems a little sketchy; further details

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must be provided in later text. It will also need to be revised to accommodate the closure policy under development. See number 4.

27. USDOE/WHC Proposal: USDOE/WHC states, "With the exception of imminent danger, all soil remediation will be conducted under the CERCLA RI/FS process."

Ecology Response: This is unacceptable, see previous Ecology NOD's for this unit. Additionally, it will be in conflict with the Ecology closure policy in development. See number 4 for additional details.

32. USDOE/WHC Proposal: Sampling of soils to a maximum depth of two feet because it is predicted that contaminants will remain in the uppermost portion of the vadose zone due to soil sorption.

Ecology Response: While it is correct that sorbed contaminants would be expected to be in the uppermost layer, assuming that all contaminants will sorb is not correct. See, for example, Freeze and Cherry 1979 or W.B. Mills et al., Journal of Association of Ground Water Scientists and Engineers, March-April 1991.

Samples must be taken at the soil-concrete and soil-asphalt interfaces, one foot, two feet, and three feet depths. The closure plan must describe the sampling methods, sample sizes, and analytical methods to be employed. The closure plan must also have detailed provisions for the case where contamination is detected at three feet (the lowest horizon). This contingency must be provided for in the scheduling of the closure activities. More specifically, the closure plan must have plans for resampling to greater depths and removal/remediation of contamination at depths greater than the initial soil sampling. In addition, all phases of the closure activities must occur in a timely fashion (including any resampling and removal/remediation necessary). See number 23.

35. USDOE/WHC Proposal: Reevaluation of the chemicals known to have been stored and used in the 304 Facility.

Ecology Response: The reevaluation is acceptable but implementation may be impacted by the closure policy under development (as discussed at the February 12, 1991, Unit Manager's Meeting). See number 4.

38. USDOE/WHC Proposal: The compounds listed in Table 7-1 are the only organic compounds associated with the 304 Facility and the only organic compounds which will be evaluated for closure.

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Ecology Response: This is unacceptable. See number 35.

50. USDOE/WHC Proposal: Postpone addition of the unit-specific health and safety plan to the closure plan until sampling occurs.

Ecology Response: This is not acceptable. This plan must be submitted prior to approval of the closure plan; sufficient time for Ecology review is required. The health and safety plan must be included with the next submittal.

54. See number 50.

57. USDOE/WHC Proposal: Inclusion of proposed text, table, and appendix.

Ecology Response: This is not adequate because it is too narrow in scope. For example, the 304 Concretion Facility has radiation zones, but RPT's are not covered. Expand the training section to cover all of the personnel which are required to be present during the closure activities.

60. See number 4.

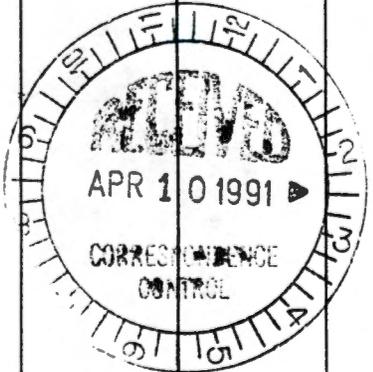
66. See number 4.

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