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Department of Energy

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

JUN 14 1995

95-TOP-090

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

Mr. Joseph J. Witczak, Unit Supervisor
Regulatory and Technical Support Unit
Nuclear Waste Program
Washington State
Department of Ecology
P.O. Box 47600
Olympia, Washington 98504-7600

Dear Messrs. Lundstrom and Witczak:

CLOSURE CERTIFICATION FOR THE 216-B-3 EXPANSION PONDS

Enclosed are the completed Closure Certifications for the 216-B-3 Expansion Ponds. These certifications have been signed by an independent, registered professional engineer, by the Westinghouse Hanford Company (WHC) as facility co-operator, and by the U.S. Department of Energy, Richland Operations Office (RL) as facility owner-operator. These signatures certify that the closure of the 216-B-3 Expansion Ponds was implemented in accordance with the specifications of the closure plan. These certifications are required by the Washington Administrative Code 173-303-610(6), and were prepared in accordance with chapter 7 of the 216-B-3 Expansion Ponds closure plan, and Condition V.8.B.f of the Hanford Facility Resource Conservation and Recovery Act (RCRA) Permit.

The 216-B-3 Expansion Ponds consist of three earthen, unlined, interconnected ponds located east of the 200 East Area on the Hanford Site. The Expansion Ponds were characterized in a three phase sampling effort from 1989 through 1992. The results of the sampling and analyses effort showed that the unit can be cleaned closed and that it no longer requires a unit specific Part A Permit Application, Form 3. Therefore, we request that the Washington State Department of Ecology (Ecology) inform the U.S. Environmental Protection Agency (EPA) Resource Conservation Recovery Information System that the 216-B-3 Expansion Ponds Treatment, Storage, or Disposal unit is now 'inactive'. The Part A, Form 3, will be reissued with 'INACTIVE' stamped on it with 'Closed on XX/YY/ZZ' which will be the date on the Ecology response letter.



Messrs Lundstrom and Witczak
95-TOP-090

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The PE certification was prepared by Paul E. Sololeski, PE of CH2M Hill, Richland, Washington. The PE has certified that all activities were completed in accordance with the approved closure plan. The PE noted five discrepancies in the approved closure plan.

These discrepancies were presented to Ecology in the April 4, 1995, Unit Manager Meeting, and in informal correspondence Ecology agreed that they were insignificant with respect to the closure decision.

We request that Ecology formally accept these certifications by June 30, 1995, in order to meet the Hanford Federal Facility Agreement and Consent Order Milestone M-17-10, to cease all liquid discharge to hazardous waste land disposal units unless such units have been clean closed in accordance with RCRA.

If you have any questions, please contact Ms. Ellen Mattlin, RL, on (509) 376-2385 or Mr. Fred Ruck, WHC, on (509) 376-9876.

Sincerely,



James E. Rasmussen, Director
Environmental Assurance, Permits,
and Policy Division
DOE Richland Operations Office



William T. Dixon, Director
Environmental Services
Westinghouse Hanford Company

Enclosures:

1. Closure Certification
2. Professional Engineer's
Certification Statement

cc w/encl:

L. Borneman, WHC
D. Duncan, EPA
S. Godfrey, WHC
R. Jim, YIN
D. Powaukee, NPT
F. Ruck, WHC
M. Selby, Ecology
R. Tranbarger, BHI
J. Wallace, Ecology
J. Wilkinson, CTUIR

cc w/o encl:

W. Dixon, WHC
S. Price, WHC

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CLOSURE CERTIFICATION
FOR 216-B-3 EXPANSION PONDS
Hanford Site
U.S. Department of Energy, Richland Operations Office

We, the undersigned, hereby certify that all 216-B-3 Expansion Ponds closure activities were performed in accordance with the specifications in the approved Closure Plan as augmented by the approved Unit Managers' Meeting minutes of April 4, 1995.

John D. Wagoner

Owner/Operator
John D. Wagoner, Manager
U.S. Department of Energy
Richland Operations Office

6/15/95

Date

A. LaMar Trego

Co-operator
A. LaMar Trego, President
Westinghouse Hanford Company

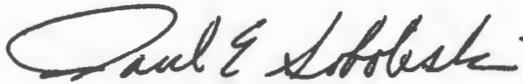
5/26/95

Date

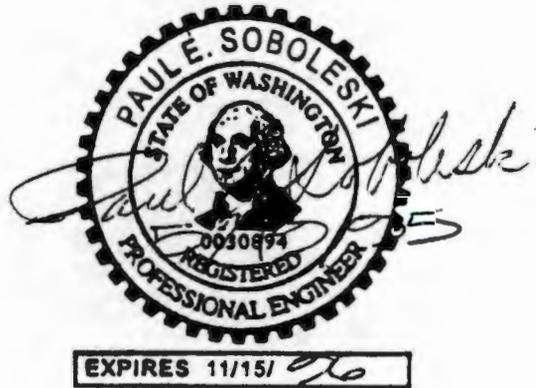
**PROFESSIONAL ENGINEER'S CERTIFICATION STATEMENT
216-B-3 EXPANSION PONDS CLOSURE PLAN CERTIFICATION**

I, the undersigned, an independent registered professional engineer, hereby certify that I have reviewed the approved Closure Plan and supporting closure documentation for the 216-B-3 Expansion Ponds Closure Plan, and to the best of my information and belief, closure activities were performed in accordance with the specifications in the approved Closure Plan, augmented by the final (approved) Unit Managers' Meeting minutes of April 4, 1995. This certification is based solely on a review of documents as described in the attached Specifications and Limitations of Professional Engineer's Certification.

The above statements are true and complete to the best of my knowledge and within the limits of professional judgment under the prevailing standards of practice on this 19th day of May, 1995.



Paul E. Soboleski, P.E.
Washington #30894
CH2M HILL



**SPECIFICATIONS AND LIMITATIONS OF
PROFESSIONAL ENGINEER'S CERTIFICATION
216-B-3 EXPANSION PONDS CLOSURE PLAN CERTIFICATION**

The 216-B-3 Expansion Ponds were closed under the direction of Westinghouse Hanford Company (WHC) employees over a period extending from 1989 to 1995.

A document entitled 216-B-3 Expansion Ponds Closure Plan (DOE/RL-89-28, Revision 2) was approved by the Washington State Department of Ecology (Ecology) and the U.S. Environmental Protection Agency (EPA). This approval was part of Modification A of the final permit for management of dangerous waste at the Hanford Site. This permit has two parts. The first part is the Dangerous Waste Portion of the Resource Conservation and Recovery Act Permit for the Treatment, Storage, and Disposal of Dangerous Waste, and is issued by Ecology. The second part is the Hazardous and Solid Waste Amendments Portion of the Resource Conservation and Recovery Act Permit for the Treatment, Storage, and Disposal of Hazardous Waste, and is issued by the EPA. The original permit (less Modification A) became effective on September 28, 1994. Modification A was issued on April 28, 1995, and is due to become effective on May 28, 1995. 39039
39767

The approved Closure Plan was augmented through Unit Managers' Meeting (UMM) minutes, signed by representatives of the Department of Energy (DOE), WHC, EPA Region 10, and Ecology. The UMM minutes provide the basis to make five (5) discrepancies noted in the professional engineer's review effort part of the Administrative Record for this Closure Plan. Those five discrepancies can be found as Attachment #5 to the April 4, 1995 UMM minutes. Ecology has indicated to WHC, by way of informal correspondence, that these discrepancies can be considered insignificant.

Paul E. Soboleski, P.E., was provided the approved Closure Plan and copies of the UMM minutes by RCRA Unit Closures of WHC. The direct contact for Mr. Soboleski at WHC was Andrea L. Prignano, Principal Scientist, RCRA Unit Closures. Fred A. Ruck, III is the WHC RCRA Unit Closures Manager. These documents, along with sampling plans, field logbooks, sampling reports, analytical results documentation, and data validation packages for soil and water sampling and analysis for all three phases of the closure plan activities, have been represented during conversation and in correspondence from these WHC individuals to be the full, accurate, complete, and representative record of closure activities at the 216-B-3 Expansion Ponds as performed by WHC staff and contractors (see Page 3 of this Attachment for a list of documents reviewed).

Paul E. Soboleski performed a review of the documents provided by WHC RCRA Unit Closures on closure of the 216-B-3 Expansion Ponds. Review of these documents was conducted to determine if the treatment, storage, and disposal unit was closed in accordance with the specifications in the approved Closure Plan, as described above. No on-site, supervisory, or verification activities were performed (e.g., site visits, independent data collection and/or validation, etc.); the activity was limited to review of those documents provided to CH2M HILL by WHC.

**DOCUMENTS REVIEWED FOR
PROFESSIONAL ENGINEER'S CERTIFICATION
216-B-3 EXPANSION PONDS CLOSURE PLAN CERTIFICATION**

General

- 1) 216-B-3 Expansion Ponds Closure Plan (DOE/RL-89-28, Revision 2) 590309
301167
- 2) Unit Managers' Meeting minutes from meeting held April 4, 1995 41358

Phase I

- 3) 216-B-3 Pond Characterization of the Hazardous Waste Inventory in the Near-Surface Soil and Sediments (Sampling and Analysis Plan, WHC-SD-EN-AP-016, Revision 1) 415
- 4) Copy of Field Logbook (no document number evident), pages 2 through 38, inclusive, dated from August 1, 1989 to September 28, 1989, logged by Richard Roos/WHC ✓
- 5) Hazardous Substance Analysis Report for Contract #005145-A-M1, dated November 14, 1989, from United States Testing Company, Inc. ✓

Phase II

- 6) Description of Work for Phase II Sampling of the 216-B-3A, -3B, and -3C Expansion Ponds (Sampling and Analysis Plan, WHC-SD-EN-AP-106, Revision 0) 24682
- 7) Copy of Field Logbook No. WHC-N-205 #15, pages 78 through 94, inclusive, dated from October 5, 1992 to October 7, 1992, logged by C.D. Morrison-Beyer/WHC
- 8) Unit Managers' Meeting minutes from meeting held June 25, 1992 22508
2200
- 9) Unit Managers' Meeting minutes from meeting held July 24, 1992
- 10) Internal memorandum from J.A. Lerch/WHC to A.L. Prignano/WHC and accompanying document. Results of Analyses for Inorganics and Organics, Roy F. Weston, Inc. Delivery Group Nos. 9210L152 and 9210L153 for samples B06D58, B06D59, B06D60, B06D62, B06D63, B06D64, B06D76, B06D78, B06D79, B06D80, B06D81, B06D82, B06D83, B06D85, B06D86, B06D87, B06D88, B06D89, B06D91, B06D92, B06D95, B06D96, and B06D97, dated January 5, 1993 ✓
- 11) Internal memorandum from J.A. Lerch/WHC to A.L. Prignano/WHC and accompanying document. Results of Analyses for Inorganics and Organics, Case No. 10-022, for samples B06D61, B06D77, B06D84, B06D94, and B06D98 (TMA/ARLI Work Order No. A2-10-022, Norcal Work Order No. N2-10-035), dated March 12, 1993 ✓
- 12) Transmittal letter from A.T. DiCenso/LATA to Karl Pool/WHC and accompanying report. Data Validation Report for the B-Ponds Phase II Radiochemical Analyses, dated July 15, 1993 ✓

**DOCUMENTS REVIEWED FOR
PROFESSIONAL ENGINEER'S CERTIFICATION
216-B-3 EXPANSION PONDS CLOSURE PLAN CERTIFICATION
(continued)**

Phase III

- 13) Copy of Field Logbook No. WHC-N-376-1, pages 1 through 81, inclusive, dated from February 5, 1991 to April 9, 1991, logged by J.D. Fancher ✓
- 14) Copy of Field Logbook No. WHC-N-376-2, pages 1 through 26, inclusive, dated from March 15, 1991 to April 17, 1991, logged by J.D. Fancher ✓
- 15) Well Summary Sheets and Borehole Logs for Well Nos. BH 3A-1, BH 3B-1, and BH 3C-1 ✓
- 16) Internal memorandum dated July 1, 1991, from J.A. Lerch/WHC to R.C. Roos/WHC and accompanying document. Results of Analyses for Inorganics and Organics, Roy F. Weston, Inc. Delivery Group No. 9102L600 ✓
- 17) Internal memorandum from dated July 8, 1991, J.A. Lerch/WHC to R.C. Roos/WHC and accompanying document, Analytical Results Package, Project 90-031, B-Pond Phase III Samples, Martin-Marietta Energy Systems, K-25 Laboratory Delivery Group No. B00FK6
- 18) Analytical Results Supplement, Project 90-031, B-Pond Phase III Samples, Martin-Marietta Energy Systems, K-25 Laboratory Delivery Group No. B00FK6 ✓



May 19, 1995

NPE 70269.07

Ms. Andrea L. Prignano, Ph.D.
Principal Scientist
RCRA Unit Closures, Environmental Services
Westinghouse Hanford Company
P. O. Box 1970
Richland, WA 99352
MSIN H6-23

Subject: 216-B-3 Expansion Ponds Closure Plan Certification
Task Order #007 under Contract No. MJK-SVV-296951

Dear Andrea:

Enclosed please find the signed and stamped Professional Engineer's Certification Statement and the attachment Specifications and Limitations of Professional Engineer's Certification for the subject task order. If you have any questions concerning this material, please contact me at (509) 943-3114.

I have sincerely enjoyed working with you on this task order and hope to be able to serve you again in the near future.

Sincerely,

CH2M HILL

A handwritten signature in cursive script that reads 'Paul E. Soboleski'.

Paul E. Soboleski, P.E.
Task Manager

pes/lk

cc: Jerry Dethlefs/CH2M HILL/RLO
File - Correspondence out

Enclosures 2