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DEPARTMENT OF ECOLOGY

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August 23,1991

RECEIVED AUG 29 1991 CORRESPONDENCE CONTROL

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

Re: Notice of Deficiency (NOD) for the 105-DR Large Sodium Fire Facility

Dear Mr. Wisness:

This letter transmits Ecology's comments on the 105-DR Large Sodium Fire Facility Closure Plan, submitted September 26, 1990. The Closure Plan was reviewed for compliance with the final facility status standards of 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 under development by the Nuclear and Mixed Waste Management Program.

3. Many of the required sections are not included with the closure plan, e.g., a contingency plan, training plan, security procedures, etc.

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Due to these inadequacies, USDOE/WHC must respond to these comments with a revised closure plan by October 25, 1991; a Notice of Deficiency Response Table should also be submitted for issue tracking purposes. Should you have questions or concerns regarding this notice, please contact Mr. Scott McKinney of my staff at (206) 493-9425.

Sincerely,

for Timothy L. Nord
Hanford Project Manager

Enclosure

cc: P. Day - EPA, Richland
D. Duncan - EPA, Seattle
D. Nylander - Ecology, Kennewick
T. Michelena - Ecology, Olympia
F. Ruck - WHC, Richland
[redacted]

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ENCLOSURE

DEPARTMENT OF ECOLOGY
NOTICE OF DEFICIENCY FOR
105-DR LARGE SODIUM FIRE FACILITY
August 23, 1991

#	Page/Line	Comment/Requirement
1.		Comment The 105-DR large sodium Fire Facility Closure Plan should follow the recommendations made in the letter from T. Nord of Ecology, to R.D. Izatt, USDOE, and R.E. Lerch, WHC, dated May 2, 1990. In this letter Ecology provides guidance on standardized outlines for Closure/Postclosure plans. In particular item #3 should be addressed. Also, in accordance with the Tri-Party Agreement, page 5-3 of the Action Plan, treatment, storage, and/or disposal units undergoing closure will do so in accordance with final facility standards as outlined in WAC 173-303-610. In order to fulfill this requirement a variety of items must be included in the closure plan. Refer to the cover letter for examples. This plan also mentions that parts of the Large Sodium Fire Facility may be left for the Reactor Decommissioning and Decontamination activities. However the Record of Decision has not been made for this action, and it is not clear whether the Large Sodium Fire Facility was included in the Environmental Impact Statements for these activities. It must be specifically stated how the Fire Facility is addressed in to the EIS, and what the Record of Decision is for the reactor decommissioning activities.
2.	1-1/25	Comment: The reference to the WAC date should reflect the most recent changes to the dangerous waste regulations which were revised April of 1991. Requirement: Revise the text to state that the most recent edition of the WAC 173-303 requirements will be followed.
3.	1-1/46	Comment: The clean-up policy now being developed by the Nuclear and Mixed Waste Management Program will help staff determine appropriate clean-up levels necessary for this facility, and what, if any, dangerous waste constituents will be left for later remediation. WAC 173-303-610 provides only two means for closure of a TSD; clean-closure and closure as a landfill with accompanying groundwater monitoring, capping and post-closure requirements.

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Requirement: The clean-up policy will be issued by Ecology as soon as completed. This will dictate whether it is feasible to close the 105-DR Large Sodium Fire Facility (LSFF) under clean closure or not.

4. 2-1/46 Comment: The plan states that burn pans and equipment were cleaned. What was the process used to clean the pans and equipment and what solutions were used other than water?

Requirement: State in the plan how this equipment was cleaned, what cleaning solutions or chemicals were used, and what was done with the rinsate from the cleaning.

5. 2-2/ Comment: Figures 2-1 through 2-4 are not sufficient maps or drawings of the facility and it's operations.

Requirement: Refer to WAC 173-303-806(4)(a)(xviii), (xx)(B) and (C), for the mapping requirements of the Dangerous Waste Regulations. Also refer to the 305-B Storage Facility Permit Application. In addition, more detailed engineering plans of the exhaust tunnel, filter building, fan pit, and fire rooms and exhaust fan room must be provided.

6. 2-6/2 Comment: The description of the path taken when effluent was released to the 116-DR-8 Crib is not well defined.

Requirement: Describe in this section what piping connections were used to route effluent to the 116-DR-8 Crib and if there are any junction boxes, catch boxes, etc. in line with this routing. Include engineering plans and design drawings for the crib routing. The piping and ancillary equipment, as well as any soil which may have been contaminated due to pipe leakage, must be remediated under this closure plan.

7. 2-6/2 Comment: A liquid drain in the bottom of the sump in the exhaust fan room is mentioned, but not where the drain goes, or how it was cleaned out.

Requirement: Describe in this section where the drain in the bottom of the sump leads. The closure plan should include engineering plans and design drawings for the sump and associated routing. It will also be necessary to sample underneath the sump to determine if any dangerous waste constituents have leaked into the soil.

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8. 2-6/9 Comment: What kinds of items were stored in the storage and office areas? The plan only states that "non-dangerous material" was stored here.

Requirement: State in this section what specifically was stored in the storage and office areas.

9. 2-9/1 Comment: The sodium storage tank and sodium stored in the 1720-DR building are to be removed under a different process, but the uses for the sodium are not explained well enough to determine whether or not this sodium stored immediately adjacent to the Large Sodium Fire Facility was used at the facility in the past.

Requirement: State in this section, in greater detail, how this sodium and storage tank were used to allow Ecology to assess it's past uses and appropriate closure status.

10. 2-9/5 Comment: This paragraph discusses test spill tanks, but does not describe the materials of which the tank is made.

Requirement: Please state the material composition of the tanks (stainless steel or ?) and describe any chemical interactions between the tanks and their contents before, during or after the test spills and fires, so that possible constituents and products of reaction may be determined.

11. 2-10/23 Comment: This sentence says that "all other entries to the reactor from the LSFF have been barricaded."

Requirement: Describe the form of the barricade and how many "other" entries to the LSFF from the 105-DR reactor exist and are barricaded this way.

12. 3-1/6 Comment: Line 6 states that various oxides, hydroxides, silicates, and carbonates, as well as residual alkali metal waste were produced during treatment and testing at the LSFF. However only sodium carbonate and lithium carbonate are generally referenced to throughout the permit as being dangerous wastes.

Requirement: Explain in greater detail the wastes created in the testing and treatment processes and list all the wastes created, as well as the volumes that were burned at the facility. Referencing

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to the RCRA Part B application from 1985 is not a sufficient categorization of the wastes associated with this facility.

13. 3-1/36 Comment: Development tests using cesium and zinc are mentioned but there is no plan for sampling for these constituents to determine the residual amounts left in the LSFF. In accordance with the Tri-party agreement (TPA), any radioactive components may be left behind for inclusion in the reactor decommissioning and decontamination activities for the 105-DR reactor. This possibility will be clarified by the issuance of the aforementioned clean-up policy.

Requirement: All possible constituents must be sampled for and remediated during closure activities. Also, the addition of zinc to the waste mixture formula may change the equivalent concentration for this waste stream thus possibly changing it's designation status.

14. 3-2/28 Comment: The reference to "draining through the sump in the exhaust fan room to the 116-DR-8 Crib" is made once again without any description of how this was achieved.

Requirement: See comment number 6 above.

15. 3-2/32 Comment: Without appropriate detailed design drawings and engineering plans for the LSFF it is difficult to relate the schematics and drawings, which are minimal at best, to the actual layout of the LSFF.

Requirement: When the plans and design drawings for the facility are provided, the exact location of the sampling taken in 1987 should be correlated with these new plans and the schematic and drawing in Appendix B.

16. 3-2/49 Comment: If it is not possible to discriminate between the lead that may have been deposited due to treatment of lithium-lead and the lead content of the paint, it will be necessary to remove all lead contamination from the walls.

Requirement: The sampling plan must include a Toxic Characteristic Leaching Procedure (TCLP) analysis for the ventilation tunnels as well as any other areas where lead contamination from the burning of lithium-lead may have occurred. The TCLP must analyze for metals, but not for organics or inorganics.

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17. 3-3/30 Comment: The radioactivity in the upper tunnel was not measured due to inaccessibility. Are there physical barriers that prevent sampling for dangerous waste constituents associated with the LSFF? If there are then how will the upper tunnel be either characterized or verified for clean closure of the LSFF.

Requirement: The upper exhaust tunnel must be sampled to determine whether clean closure has been achieved. The upper tunnel must also be analyzed using the TCLP outlined in comment number 16. The closure plan should address whether or not it is physically possible to sample the upper exhaust tunnel and whether or not it can be included in the clean closure of the LSFF, considering whatever barriers to performing decontamination activities are there.

18. 4-1/ Comment: This entire section on waste characteristics is lacking in detail and content.

Requirement: Expand this section to include a more complete discussion of all the waste products produced and their chemical properties per WAC 173-303-610. Include all constituents present, their form and their concentrations.

19. 4-1/24 Comment: No mention of the chemical properties of zinc and it's compounds or of cesium and it's compounds is made.

Requirement: Include the appropriate chemical properties for these two constituents. Include whether they are expected to be present, what form and concentrations they may be in, and their decomposition products if any.

20. 4-1/41 Comment: Although the WAC 173-303 designations for lead are listed, there is no discussion of the types of products formed by the reaction of lithium-lead alloy.

Requirement: The products of reaction and decomposition products for the lithium-lead alloy tests should be included in this section, and each constituents chemical properties discussed.

21. 5-1/ Comment: If Ecology determines that it is necessary for documentation to be presented showing that the LSFF has not adversely impacted the soils or groundwater in the area around it, then that information must be presented as outlined in WAC 173-303-

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645, in order for the facility to be clean closed. (Section 6.3.1, page 6-5, TPA, August,1990)

Requirement: Please write a paragraph into the groundwater chapter that reflects the above.

22. 6-1/46 Comment: This section does not address the removal of possible lead contamination in either the soil or the concrete walls. This possibility must be addressed along with the removal actions for sodium and lithium carbonates.

Requirement: If it is determined that there is lead contamination in the soil and/or concrete, it must be tested using the TCLP method for metals. Soil and concrete will be cleaned to natural background. Include in this section a description of the actions to be taken (including TCLP and background determinations) if lead contamination is found in soils or concrete.

23. 6-2/16 Comment: This section states that "baseline" samples and known contaminated samples will be compared to determine whether contamination is above general baseline levels. The use of the word "baseline" does not have any meaning.

Requirement: Any comparisons of facility samples must be compared to site-wide background levels as determined by the Site-wide Background Study currently taking place.

24. 6-2/24 Comment: This line states that dangerous waste left on the concrete (residuals) will not be a health hazard to humans or a threat to the environment and that it will be left for the reactor decommissioning. No dangerous waste can be left in place following a clean closure per WAC 173-303-610. If waste is left in place, then postclosure requirements must be met. The Nuclear and Mixed Waste Management (N&MWM) program's clean-up policy may affect the type of closure pursued at this facility.

Requirement: Closure of the LSFF must meet the clean closure requirements of WAC 173-303-610, or postclosure requirements of WAC 173-303-610 will be imposed on the facility.

25. 6-2/30 Comment: This section states that soil will be cleaned to "action levels". The term "action level" has no meaning and should not be used in this closure plan. Soil must be cleaned either to

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background levels or there will be post-closure requirements imposed on the LSFF.

Requirement: The level of clean-up required will be influenced by the N&MWM program's soil clean-up policy. This will be provided as soon as completed. Background will be determined by the Sitewide Background Study currently in progress.

26. 6-2/33 Comment: The reference here is to the TCLP of 1988. The latest edition of the TCLP was released in September of 1990.

Requirement: Change the reference to the latest edition of the TCLP.

27. 6-2/43 Comment: Any further assessment of "action levels" will be done according the N&MWM program's clean-up policy.

Requirement: This policy will be released as soon as completed.

28. 6-3/11 Comment: The second bullet states "Confirm that the source of previously detected lead...". Using the word confirm presumes that the lead is from the paint and is not an unbiased scientific approach.

Requirement: Change the wording to say "Determine if the source...".

29. 6-3/39 Comment: As stated earlier there needs to be more information regarding this sodium in storage before Ecology can agree on whether it is appropriate to not address it in this closure plan. See comment number 9.

Requirement: Describe the life cycle of the sodium stored in the tank including when it was purchased, what it's intended use was, if it was moved from or to another facility, whether sodium was drawn from this tank, etc. Include as much detail as possible.

30. 6-4/ Comment: Sample areas should be referenced to maps showing locations. Also, this chart will be impacted by the N&MWMP clean-up policy.

Requirement: Include a reference in Figure 1 to page B-3 and Appendix C so that sample areas can be easily matched.

31. 6-5/23 Comment: Once again deferral of contaminants to the reactor decommissioning is stated. Clean closure cannot be achieved without complying with WAC 173-303-610 closure performance standards. See comment number 24. Specifically, soil remediation will be performed under this closure plan either to local background or to postclosure standards.

Requirement: The closure strategy for the LSFF will be determined with the issuance of the N&MWMP clean-up policy.

32. 7-1/12 Comment: The second bullet states again that the purpose of sampling is "To confirm that the source of...". This wording is inappropriate. See comment number 28.

Requirement: Replace the word "confirm" with "determine".

33. 7-1/15 Comment: Here also the word verify is not the appropriate verbage. See comment number 28.

Requirement: Replace "To verify that..." with "To determine if the..."

34. 7-1/38 Comment: The N&MWMP clean-up policy will determine the levels of clean closure and/or postclosure requirements necessary to close the LSFF.

Requirement: This section will have to be modified to reflect the changes made when the clean-up policy is issued and following the decision on the closure strategy for the LSFF.

35. 7-2/all Comment: The various test methods cited in this section are usually referencing EPA's SW-846 test methods. However, WAC 173-303-110 is the appropriate listing of test methods to be used under the State Dangerous Waste regulations. In some cases SW-846 is an appropriate method, but some of the tests must follow approved ASTM Standards.

Requirement: Following the requirements of WAC 173-303-110, correct the test methods for the various samples throughout this section. These are the approved test methods and must be used.

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36. 7-2/10 Comment: This section on characterization sampling should include a reference to Appendix C.

Requirement: Include the reference to Appendix C in this section.

37. 7-2/30 Comment: Is this the most recent edition of the E.I.I. 2.3 (WHC,1988)?

Requirement: Reference the latest edition of this E.I.I. This E.I.I. must be reviewed by Ecology prior to it's inclusion in the closure plan.

38. 7-2/34 Comment: Area 1 must be sampled in many more locations than are outlined in this section and Appendix C including, but not limited to; office area, walls, floor and ceiling of the fire rooms and sodium handling room as well as any other area 1 location that may have received dangerous waste during operating years or since.

Requirement: Include in this section and in Appendix C a detailed description of the sampling plan for area 1 that will include the areas outlined above and any other areas that may have been impacted by past practices of the LSFF or where dangerous waste may have migrated since cessation of operations.

39. 7-2/49 Comment: This line calls for "baseline" sampling to be done on the exterior wall of the exhaust fan room. This term has no meaning. The appropriate term is background.

Requirement: More information on the activities around the external areas of the LSFF is needed to determine whether this is an appropriate place to do the background sampling. Sampling must be done on concrete that is unimpacted be past practices of dangerous waste activities.

40. 7-2/49 Comment: Field screening using an X-ray fluorescence device is proposed, but the operating parameters for the device are not included in the closure plan.

Requirement: Include the operating parameters for the X-ray fluorescence device either in the QA/QC section of Chapter 7.0 or in the QA/QC appendix. Include the detection limits for the device.

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41. 7-3/13 Comment: Dual-level sampling will not succeed if; there is fugitive lead-contaminated dust on both the surface deposits and the painted walls, or if there is lead-contaminated dust on either the deposits or the wall. Assurances must be made that any possibility of contamination with lead dust is eliminated.

Requirement: State in this section how lead will be sampled for, taking into account the above stated problems.

42. 7-3/20 Comment: As stated previously it is not appropriate to leave dangerous waste and/or constituents associated with the LSFF for later decontamination.

Requirement: See comment number 24.

43. 7-3/29 Comment: Surfaces must be cleaned to background levels, not "below dangerous waste levels".

Requirement: Rewrite this section to comply with WAC 173-303-610(2)(b)(i).

44. 7-3/31 Comment: What is considered appropriate disposal of the gravel from the gravel scrubber?

Requirement: Considering the possible designation status of the gravel, list the disposal alternatives for the gravel scrubber.

45. 7-3/42 Comment: Sampling of the filters is required whether or not there are visible deposits on them.

Requirement: The filters must be sampled for designation status. Rewrite this section to state the same.

46. 7-3/44 Comment: The 117-DR building must be cleaned to the closure performance standards of WAC 173-303-610 before it can be left for the decommissioning activities. Additionally, it may be that the concrete walls of the 117-DR building have been painted with lead based paints and the same sampling problems will arise as elsewhere concerning lead. See paragraph 2 of comment #1.

Requirement: Closure will follow WAC 173-303-610 and N&MWMP clean-up policy.

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47. 7-3/47 Comment: The area at the base of the stack must be sampled for the presence of sodium, lithium and lead, at least, to determine if the dangerous waste constituents have been deposited in the stack.

Requirement: State how the stack will be sampled for dangerous wastes associated with the LSFF.

48. 7-4/7 Comment: Deferral of sampling and treatment of the 116-DR-8 crib to the 100-HR-3 RFI/CMS is not appropriate for the soil, and may not be for the groundwater. If there have been releases to the crib from this facility, then their may need to be groundwater monitoring activities in accordance with WAC 173-303-645 and the Tri-Party Agreement section 6.3.1 of the Action Plan.

Requirement: This section must include the description of the sampling to be done on the soil in the 116-DR-8 crib area, and a more detailed discussion of the types of releases to the crib in order to determine if dangerous wastes have been deposited into the soil and groundwater, and if groundwater monitoring requirements are applicable. Are there any RCRA groundwater monitoring wells around the LSFF and the 116-DR-8 crib that may be used to characterize the groundwater?

49. 7-4/24 Comment: This section calls for four random soil samples to be taken at a depth of 6 to 12 inches.

Requirement: The samples must be taken to a depth of three feet and sampled at the surface, 1 foot, 2 feet, and 3 feet. The sampling plan must also contain a contingency for further sampling if contamination is detected at these depths. This further sampling must be allowed for in the closure schedule.

50. 7-4/44 Comment: This section says that the small pieces of equipment will not be sampled. However, clean closure cannot be approved without some form of verification.

Requirement: There must be some method for verifying decontamination of the various small parts associated with the LSFF apparatus. Clean closure cannot be approved without it. Include the plan for verification sampling in this section.

51. 7-5/18 Comment: The QA/QC procedures used in this closure plan must adhere

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to and mesh with the QA/QC procedures being developed for the Sitewide Hanford Facility RCRA Permit.

Requirement: This section must state that all procedures are in accord with the Sitewide QA/QC requirements.

52. 7-6/14 Comment: The sentence here ends; "...by a Westinghouse Hanford."

Requirement: Complete the sentence.

53. 7-7/16 Comment: This sentence says that a method comparable to SW-846 standards for inorganics will be used for lithium analysis.

Requirement: Please state in this section the test methods proposed for Lithium. All test methods not listed in WAC 173-303-110 must be approved by Ecology before the closure plan can be approved. See WAC 173-303-110(5).

54. 7-7/22 Comment: A Ph greater than or equal to 12.5 or less than or equal to 2 is considered corrosive. Although the solution is expected to be basic, the full scope of the regulation should be stated here.

Requirement: State the full wording of the WAC 173-303-090(6)(a)(i).

55. 7-7/24 Comment: The Health and Safety Plan is mentioned here. This plan must be included with this closure plan application.

Requirement: See the cover letter for remarks.

56. 7-7/28 Comment: This line states what the concrete cores will be analyzed for, but it is incomplete.

Requirement: Concrete cores must be analyzed for lead as well using the Toxicity Characteristic Leaching Procedure (TCLP), from 40 CFR 261.24. Also, there must be a plan for sampling below the concrete for any contaminants that have escaped the system.

57. 7-9/18 Comment: This paragraph discusses the alternatives if there are problems with the sampling or if there is "significant differences in mean concentrations" between facility and baseline samples.

Requirement: If there are significant differences between facility and background samples then clean closure will have to be abandoned or further remediation must be done on the facility. Insufficient data should not be a problem if this sampling plan is done properly. Again, the N&MWMP soil clean-up policy will determine what level the facility must be cleaned to in conjunction with WAC 173-303-610.

58. 7-10/30 Comment: Standard sampling techniques are mentioned and "(EPA, 1987)" is also referenced.

Requirement: Please state the specific sampling guidelines. Also refer to comment number 53.

59. 7-10/41 Comment: All samples will be field tested for lead, but only one will be sent to the lab for validation. It is more appropriate to send at least two and preferably three samples to the lab for redundancys sake, thus precautioning against unforeseen loss of sample integrity, chain of custody, or laboratory failures.

Requirement: Change this section to include the laboratory sampling of three of the field screened samples.

60. 7-10/42 Comment: Once again the field screening with X-ray fluorescence is referred to, but none of the operating parameters of the device are included.

Requirement: See comment number 40.

61. 7-11/21 Comment: The bullet on this line proposes listing only the "constituents or parameters of concern", and assumingly eliminating those not of concern.

Requirement: The list of results should include all contaminants sampled, not just those "of concern". It is presumptuous to leave out painstakingly gathered data from the analysis or reporting. Report all data for which the analysis provides results including negative results.

62. 7-11/40 Comment: The numbers of QA/QC samples are proposed to be left out of Table 7-2.

Requirement: These QA/QC samples should be included for reference sake in Table 7-2.

63. 7-12/27 Comment: This line says that the sampling plan will be modified as needed and recorded in the logbook, along with the circumstances requiring the modification.

Requirement: Modifications to the sampling plan must be recorded in the logbook and made available for review by Ecology upon request. They should also be provided at the Unit Manager's meetings for transmittal to Ecology.

64. Tbl 7.2 Comment: The stated purpose of several of the sample points is verification, anticipating the given area will not designate as dangerous waste. It is presumptuous to do verification sampling prior to doing characterization.

Requirement: Change the wording in this table so that the purpose of all samplings is characterization, not verification.

65. 7-12/38 Comment: The Health and Safety Plan (HASP) was not included with the LSFF Closure Plan.

Requirement: The HASP must be included with the Closure plan for review and approval by Ecology. See the cover letter for other items required under the final facility standards.

66. 7-13/1 Comment: All dangerous wastes generated by the clean-up of the LSFF are subject to WAC 173-303. Also, the description of the rinsate collection is insufficient. There needs to be more detail added describing how the rinsate will be contained, collected and placed into the drums, as well as how the drums will be accumulated before shipping.

Requirement: Include a line in the opening paragraph that states the above generator requirements. Also include in this section a detailed description of how the rinsate from the high pressure wash and/or acid wash will be contained, collected and placed into the drums, as well as how the drums will be stored.

67. 7-13/29 Comment: This line calls for disposal of cleaned metal scrubber materials at the Central Waste Complex. Since the Central Waste

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Complex (CWC) is only a storage facility, disposal of materials at CWC is not possible.

Requirement: Reword this line to state what will be done with the cleaned metal scrubber materials.

68. 7-13/39 Comment: Possible disposal options for the filters is deferred until characterization sampling has occurred. It is very likely that the filters will designate as dangerous waste since they were the primary means of removing the sodium, lithium and lead contaminants from the waste stream. The disposal options for the HEPA filters must be included in this closure plan.

Requirement: Include the possible disposal options for the HEPA filters in the LSFF closure plan.

69. 7-13/48 Comment: If soil alkalinity is above background levels or there is above background levels of lead, then the soil must be remediated with the rest of the LSFF to accomplish clean closure.

Requirement: The N&MWMP soil clean-up policy will affect the clean-up of soil associated with the LSFF and 116-DR-8 crib. See comment number 2.

70. 7-14 Comment: Figure 7-1 calls for mixed waste either to be stored at the CWC or to "leave and treat with the 100-DR-2 unit".

Requirement: The leave and treat with 100-DR-2 unit option is not allowable at TSD closures. All generated waste must be sent to a TSD facility within 90 days of generation.

71. 7-15/12 Comment: The details surrounding collection of rinsate are not included in this section.

Requirement: More information, particularly how the rinsate will be prevented from escaping to the environment, must be included in this section.

72. 7-15/29 Comment: Figure 2 will need to be modified.

Requirement: See comment number 73.

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73. 7-16 Comment: The figure on this page does not allow time for Ecology to review and approve different aspects reflected in the schedule, or those times are figured in but not shown as separate incidents. For example, no time is allowed for approval by Ecology of the HASP.

Requirement: Modify this table to show the areas that will require Ecology approval and propose times for those actions to take place.

74. 8-1/11 Comment: The notice on this page must also be sent to Ecology per WAC 173-303-610(10)(a).

Requirement: Include verbage in this section that states that a copy of this notice will be sent to Ecology concurrently with the notice to the county auditor.

75. 8-2/5 Comment: Deferral of closure of the LSFF will require some level of postclosure care per WAC 173-303-610(7) through (11). The upcoming N&MWMP soil clean-up policy will also determine the level of post-closure care needed at the LSFF until final closure with other remediation programs.

Requirement: The N&MWMP soil clean-up policy will be issued as soon as approved and this will determine possible postclosure activities at the LSFF.

76. 9-1/21 Comment: This reference is outdated.

Requirement: Reference the August, 1990 version of the Hanford Federal Facility Agreement and Consent Order.

77. 9-1/26 Comment: Outdated reference to the Dangerous Waste Regulations.

Requirement: Latest edition should be referenced which is dated April, 1991.

78. 9-1/37 Comment: Outdated reference to Identification and Listing of Hazardous Waste.

Requirement: Reference to the 1990 edition of 40 CFR.

79. 9-1/41 Comment: Outdated reference to Interim Status Standards for Owners

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and Operators of Hazardous Waste, Treatment, Storage, and Disposal Facilities.

Requirement: Reference to the 1990 edition of 40 CFR.

80. F-i Comment: This QA/QC plan must comply and interface with the sitewide QA/QC plan for the Hanford Sitewide RCRA permit.

81. F-4/19 Comment: This line states that analytical procedures for alternate labs will be approved by Westinghouse Hanford. Ecology must also approve these procedures as part of the closure plan prior to their use.

Requirement: Include Ecology approval as part of the approval process for the alternate labs as well as the primary labs.

82. F-4/31 Comment: "Westinghouse Hanford-approved QA plans and/or procedures" are mentioned.

Requirement: All plans and procedures associated with the LSFF closure plan must be approved by Ecology as well. Include Ecology approval as a requirement for use of these plans and procedures.

83. F-4/41 Comment: As stated previously it is not proper to state the objective concerning lead to be "confirm that...". Instead it should reflect proper scientific open-mindedness by stating "determine if...".

Requirement: See comment number 28.

84. F-4/43 Comment: Verify is not the appropriate wording here either.

Requirement: See previous comment.

85. F-5/7 Comment: The procedures used during the remediation are the practical details addressing closure of the LSFF. These must be reviewed and approved by Ecology prior to their use in this closure plan.

Requirement: Submit the procedures referenced in section 4.1 for review. Procedures previously submitted need not be resubmitted.

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86. F-5/12 Comment: Zinc and cesium have been used at the LSFF, but they are not listed here as being "analytes of interest".

Requirement: Zinc and cesium must be included in the analytes sampled for (Table F-1), and they must be addressed as possible dangerous waste constituents in the LSFF.

87. F-8/27 Comment: Changes to the procedures should be reviewed by Ecology prior to implementation. The scope of the change and it's anticipated effect will be considered. This will help to prevent undue duplication of actions as has been the case in other RCRA activities that were carried out without consulting with Ecology, many of which had to be repeated.

Requirement: Any changes to the procedures must be approved by Ecology prior to implementation.

88. F-9/ Comment: This table shows the E.I.I.'s for the LSFF. These procedures must be reviewed and approved by Ecology prior to their use in the LSFF closure.

Requirement: Submit the E.I.I.'s listed in table F-2 for review by Ecology. Any procedures previously submitted need not be resubmitted.

89. F-10/32 Comment: This line states that calibration should follow the applicable standard analytical methods subject to WHC review and approval.

Requirement: If WHC intends or decides to use another calibration method it must be reviewed and approved by Ecology prior to enactment, in accordance with WAC 173-303-110.

90. F-16/12 Comment: The latest edition of the Hanford Federal Facility Agreement and Consent Order is not referenced here.

Requirement: Reference the August, 1990 edition.

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