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STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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September 1, 1998

Mr. John Wagoner, Manager  
U.S. Department of Energy  
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Mr. James Rasmussen,  
Environmental Assurance, Permits,  
and Policy Division  
U.S. Department of Energy  
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P.O. Box 550, MSIN: A5-15  
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Mr. Larry Romine, Transition Program  
U.S. Department of Energy  
Richland Operations Office  
P.O. Box 550, MSIN: R3-79  
Richland, WA 99352

Mr. William D. Adair  
Fluor Daniel Hanford, Inc.  
P.O. Box 1000, MSIN: H6-21  
Richland, WA 99352



Dear Messrs. Wagoner, Rasmussen, Romine, and Adair:

Re: 324 Building Radiochemical Engineering Cells, High-level Vault, Low-level Vault,  
and Associated Areas Closure Plan, Revision 1 (DOE/RL -96-73)

48909

References:

- (1) Letter from Mr. James E. Rasmussen (U.S. Department of Energy [USDOE]) to Mr. Steve M. Alexander (Washington State Department of Ecology [Ecology]), "TRANSMITTAL OF DOE/RL-96-73, 324 RADIOCHEMICAL ENGINEERING CELLS, HIGH-LEVEL VAULT, LOW-LEVEL VAULT, AND ASSOCIATED AREAS CLOSURE PLAN, REVISION 1," dated March 31, 1998.
- (2) Letter from Mr. James E. Rasmussen (USDOE) to Ms. J. J. Wallace (Ecology), "TRANSMITTAL OF SUPPORTING DOCUMENTS FOR THE 324 BUILDING RADIOCHEMICAL ENGINEERING CELLS, HIGH-LEVEL VAULT (HLV),

49083

49244

**LOW-LEVEL VAULT (LLV), AND ASSOCIATED AREAS CLOSURE PLAN,"**  
dated May 12, 1998.

- (3) Letter from Mr. John Wagoner (USDOE) to Ms. J. J. Wallace (Ecology),  
"TRANSMITTAL OF SCHEDULE FOR DOE/RL-96-73, 324 BUILDING  
RADIOCHEMICAL ENGINEERING CELLS, HIGH-LEVEL VAULT (HLV),  
LOW-LEVEL VAULT (LLV), AND ASSOCIATED AREAS CLOSURE PLAN,  
REVISION 1," dated June 5, 1998. 49399
- (4) Letter from Mr. Larry Romine (USDOE) to Ms. J. J. Wallace (Ecology),  
"TRANSMITTAL OF PROJECT TRACKING AND PERFORMANCE  
EVALUATION DOCUMENTS FOR DOE/RL-96-73, 324 BUILDING  
RADIOCHEMICAL ENGINEERING CELLS, HIGH-LEVEL VAULT (HLV),  
LOW-LEVEL VAULT (LLV), AND ASSOCIATED AREAS CLOSURE PLAN,  
REVISION 1," dated June 23, 1998. ✓

Ecology has reviewed the 324 Building Radiochemical Engineering Cells, High-level Vault, Low-level Vault, and Associated Areas Closure Plan (Closure Plan) and the associated subject documents. Submission of the 324 Closure Plan and the associated documents fulfill Tri-Party Agreement (TPA) Milestone M-20-55. The Closure Plan, State Environmental Policy Act (SEPA) Checklist, and the Notice of Deficiency Response Table have been determined to be complete and accurate contingent upon the following actions:

- (1) Modification of the Hanford Federal Facility Agreement and Consent Order (TPA) Milestones, M-89-00 and M-89-02, and
- (2) Establishment of Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) applicable or relevant and appropriate requirements (ARARs) for all closure activities conducted in conjunction with CERCLA remedial actions.

The TPA, M-89-00, calls for the complete Closure of Non-Permitted Mixed Waste Units in the 324 Building REC B-Cell, REC D-Cell, and High Level Vault. The milestone currently states that a date will be established for this major milestone immediately following Ecology approval of the REC/HLV closure plan. Currently, the due date for TPA Milestone M-89-00 is specified as "TBE." Therefore, a due date must be established for TPA Milestone M-89-00 for the complete closure of the 324 unit.

The scope of the TPA Milestone M-89-02, removal of the 324 Building, REC, B-Cell mixed waste and equipment, has been incorporated into the closure plan. Closure performance standards and the compliance schedule presented in the closure plan are hereby approved and deemed enforceable by Ecology. The TPA Milestone M-89-02 current due date of May 1999 will require modification to bring it into agreement with the closure plan schedule. Ecology requests that RL draft and submit to Ecology by October 15, 1998, a TPA change package to modify M-98-00 and M-89-02.



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Closure activities may be coordinated with other remedial activities such as facility transition, decontamination and decommissioning, or Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) actions. Closure activities are not to be compromised or otherwise circumvented due to integration with other remedial actions. All non-compliances or deviations from actions specified in the Closure Plan are to be reported to Ecology. All ARARs developed in accordance with 121 (d)(2) of CERCLA are subject to review and approval by Ecology. Ecology reserves the right to develop and enforce closure performance standards if it deems proposed ARARs are not consistent with the Closure Plan or the requirements of the Dangerous Waste Regulations, Washington Administrative Code 173-303.

If you have any questions regarding the above matter, please contact me at (509) 736-3025.

Sincerely,



Jeanne Wallace  
300 Area Project Manager  
Nuclear Waste Program

JW:skr

cc: Russell Jim, YIN  
Donna L. Powaukee, NPT  
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L. G. Olguin, FDH  
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E. M. Mattlin, DOE  
D. C. Langstaff, DOE  
A. Clark, BWHC  
Administrative Record: 324 REC/HLV