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Department of Energy  
Richland Operations Office  
P.O. Box 550  
Richland, Washington 99352

07-SED-0249

MAY 16 2007

Ms. Elin D. Miller, Regional Administrator  
U.S. Environmental Protection Agency  
Region 10  
1200 Sixth Avenue, RA-140  
Seattle, Washington 98101

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EDMC

Dear Ms. Miller:

TOXIC SUBSTANCES CONTROL ACT NOTIFICATION OF SELF-IMPLEMENTING  
DISPOSAL OF THE ALBANY SITE POLYCHLORINATED BIPHENYL (PCB)  
REMEDIAATION WASTE IN STORAGE AT HANFORD

Enclosed is the information regarding disposal plans for the PCB remediation waste. The waste was produced in the early 1990s during remediation of an out of service wastewater treatment system that operated during the 1950's in Albany, Oregon. The waste is a result of PCB spills that occurred before April 18, 1978. This bulk PCB remediation waste will be disposed in compliance with the Code of Federal Regulations (CFR), Title 40, Section 761.61 as required by 761.50(b)(3)(i)(B). These plans support removal and disposal of materials that have been in storage in the Hanford Site Solid Waste Operations Complex (SWOC) pursuant to the *Hanford Federal Facility Agreement and Consent Order* (TPA) Milestone M-91-42. This activity was discussed with Dave Bartus of the U.S. Environmental Protection Agency (EPA), Region 10 on March 20, 2007, and with Deborah Singleton of the State of Washington Department of Ecology, during the Low-Level Burial Grounds Project Managers Meeting on March 22, 2007.

Fluor Hanford, Inc. and the U.S. Department of Energy, Richland Operations Office plan to remove this waste from storage at the SWOC and dispose of it into the mixed waste trenches, a *Resource Conservation and Recovery Act* (RCRA) Subtitle C landfill, at the Low-Level Burial Grounds. This waste is PCB remediation waste with a radioactive component, but is not designated as dangerous waste in accordance with Washington Administrative Code 173-303. The waste consists of soil and gravel with some material such as concrete, rags, plastic, asphalt, and protective clothing. The probable source of PCB is leaks of hydraulic fluid or insulating fluids. The total waste weight is 33,000 kilograms, of which 15 kilograms is PCB.

The only activity described herein is disposal of the PCB remediation waste from the Albany Site cleanup currently in storage in the SWOC. This activity is not meant to decontaminate any portion of the SWOC or the original location of the source of the waste. Disposal of PCB remediation waste into a RCRA Subtitle C landfill is allowed by 40 CFR 761.61(a). Hanford has available a RCRA Subtitle C landfill that can accept radioactive waste.

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According to 40 CFR 761.61(a)(3)(ii), the EPA has 30 days to respond to the notification. If the EPA does not respond within 30 days, the notification is considered complete and acceptable, and disposal of the bulk PCB remediation waste will proceed as described. Any change to information provided in the notification will be transmitted to the EPA, as required, no less than 14 days prior to the change being implemented. If the EPA does not respond to the proposed change within the 14 days, the change will be considered acceptable and implemented as described.

If you have any questions, please contact me, or your staff may contact Doug S. Shoop, Assistant Manager for Safety and Engineering, on (509) 376-0108.

Sincerely,

  
Keith A. Klein  
Manager

SED:ACM

Enclosure

1. Toxic Substances Control Act

cc w/encl:

D. Bartus, EPA  
G. Bohnee, NPT  
D. Duncan, EPA  
S. Harris, CTUIR  
J. A. Hedges, Ecology  
J. E. Hyatt, FHI  
R. Jim, YN  
J. L. Nuzum, FHI  
A. L. Prignano, FHI  
D. Singleton, Ecology

Administrative Record H6-08 *D-2-9*  
Environmental Portal

*Milestone: M-91-42*

ENCLOSURE

*TOXIC SUBSTANCES CONTROL ACT*  
NOTIFICATION OF SELF-IMPLEMENTING DISPOSAL  
OF THE ALBANY SITE POLYCHLORINATED BIPHENYL REMEDIATION WASTE IN  
STORAGE AT HANFORD

**TOXIC SUBSTANCES CONTROL ACT (TSCA)**  
**NOTIFICATION OF SELF-IMPLEMENTING DISPOSAL**  
**OF THE ALBANY SITE POLYCHLORINATED BIPHENYL (PCB)**  
**REMEDICATION WASTE IN STORAGE AT HANFORD**

**BACKGROUND**

This information is provided by the U.S. Department of Energy, Richland Operations Office and Fluor Hanford, Inc. (FHI) in support of plans to dispose of bulk PCB remediation waste in compliance with the Code of Federal Regulations (CFR), Title 40, Section 761.61 as required by 761.50(b)(3)(i)(B).

The FHI Waste Stabilization and Disposition (WSD) Project personnel intend to remove waste from storage at the Solid Waste Operations Complex (SWOC) and dispose of this waste into the mixed waste disposal trenches, a *Resource Conservation and Recovery Act (RCRA) of 1976* Subtitle C permitted landfill. The only activity covered by this notification is disposal of PCB remediation waste currently in storage at the SWOC. This activity is not meant to decontaminate any portion of the SWOC or the original location of the waste.

This waste is PCB remediation waste with a radioactive component. Because of the radioactive component, there are limited options for disposal of this waste. PCB remediation waste with greater than 50 ppm PCBs can be disposed in accordance with 40 CFR 761.61(a)(5)(i)(B)(2)(ii) into a RCRA Subtitle C landfill or a *TSCA of 1976* chemical waste landfill. The Hanford Site has available a RCRA Subtitle C landfill that can accept this radioactive PCB waste.

As this is not a site cleanup, many of the requirements noted in 40 CFR 761.61(a) do not apply. Only information necessary for evaluation of the disposal of the waste is presented. Information on cleanup activities, such as sampling procedures and locations, extent of contamination, schedule for cleanup, and a signed certification that all sampling plans are on file is not applicable and, therefore, is not included.

**SPILL HISTORY AND PCB WASTE GENERATION ACTIVITIES**

The waste was generated in the early 1990's from the cleanup of a wastewater treatment system called the 'lime pit' located at the Albany Research Center (ARC) in Albany, Oregon. The ARC is a Bureau of Mines facility established in 1943 that conducted research that supported mineral resource development and metallurgical development. The lime pit was placed in service in the early 1950s and was removed from service in the mid to late 1950s. The lime pit was used to neutralize acidic wastewater before discharge to a municipal sewer. The liquid waste flowed over limestone then settled in a sedimentation chamber before discharge from the pit. The site, including the lime pit, was remediated by the U.S. Department of Energy in the early 1990s. The lime pit soils, with some debris, were removed, packaged into drums, and shipped to Hanford for storage.

The soil removed from the lime pit was originally characterized as being contaminated with radioactive material. Dark staining observed on the loading dock surface near the lime pit prompted sampling of the material for PCBs. PCBs were detected at concentrations greater than 50 ppm. Interviews with site personnel indicated that the most likely source of the PCBs was hydraulic fluid or insulating fluids.

Waste records document the contents of the waste containers. The waste is contained in 126 85-gallon drums located in storage at the Hanford SWOC. The waste, material originally used to backfill the lime pit, is soil and gravel with some material such as concrete, rags, plastic, asphalt, and protective clothing produced when removing the lime pit treatment system. The containerized waste has been in storage in the SWOC since September 1992.

The waste consists of 101 drums containing primarily soil/gravel, 23 drums containing primarily material such as concrete, rags, plastic, asphalt, and protective clothing, and two drums containing remnants of the samples of soil/gravel taken from the other drums. The waste is contaminated with PCBs and low levels of radioactivity. The probable source of PCB is leaks of hydraulic fluid or insulating fluids. The waste has been evaluated pursuant to Washington Administrative Code 173-303 and determined to not be dangerous waste. The total waste weight is 33,000 kilograms, of which 15 kilograms is PCB.

#### **SAMPLING AND ANALYSIS ACTIVITIES**

Sampling is not required for disposal of bulk PCB remediation waste at greater than 50 ppm PCBs. Nevertheless, sampling and analysis for PCB concentration in the waste placed in containers was performed. Of the 126 drums, 100 were sampled and tested for PCB. Drums not sampled were those generally filled with debris material such as concrete, rags, etc. The testing of samples for PCBs was performed using gas chromatography by an on-site laboratory located at Albany. PCB levels detected in the 100 drums ranged from 58 to 2625 ppm PCB, with an average of 461 ppm. In addition, the contents of each drum will be visually inspected prior to disposal to ensure they meet waste acceptance criteria. Waste not meeting waste acceptance criteria will be managed separately from this notification.

#### **RATIONALE FOR DISPOSAL AT A SUBTITLE C FACILITY**

The waste meets the definition of PCB remediation waste. PCB remediation waste per the definition of 40 CFR 761.3 can include waste containing PCBs as a result of a spill, release, or other unauthorized disposal which occurred before April 18, 1978 at current as-found concentrations that are greater than 50 ppm. These PCBs were spilled prior to April 18, 1978 and the as-found PCB measured concentrations ranged from 58 to 2625 ppm. Cleanup of PCBs spilled prior to April 18, 1978 with as-found concentrations greater than 50 ppm PCBs is not regulated. However, unilateral decisions to dispose of such PCBs must comply with 40 CFR 761.61 [See 40 CFR 761.50(b)(3)(i)(B)]. Because of the radioactive component in this waste, disposal to a RCRA permitted land disposal facility that can accept radioactive waste is the only option available.

The mixed waste disposal unit on the Hanford Site is able to accept waste with both hazardous and radioactive components. As noted on the Hanford Notification of PCB Activity, form 7701-53, the mixed waste disposal unit, a RCRA Subtitle C landfill, accepts TSCA regulated PCB waste at greater than or equal to 50 ppm PCB under provisions in 40 CFR 761 Subpart D which allow disposal of specified PCB wastes into a RCRA Subtitle C landfill.

No additional PCB sampling or analysis is proposed for the waste. Waste disposal in the mixed waste disposal unit meets the requirements for the non-liquid PCB remediation waste at any PCB concentration.