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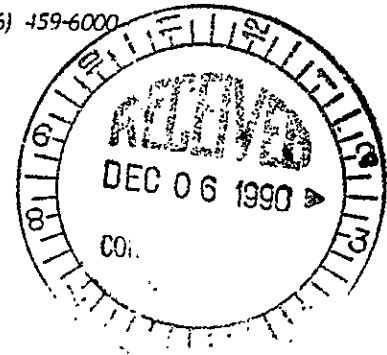
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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Mail Stop PV-11 • Olympia, Washington 98504-8711 • (206) 459-6000

November 9, 1990



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

RE: Notice of Deficiency: 300 Area Solvent Evaporator Closure Plan

Dear Mr. Wisness:

We have completed our review of the 300 Area Solvent Evaporator (300 ASE) Closure Plan (Revision 3) dated March 30, 1990. The deficiencies listed in the enclosure to this letter constitute our final comments before approving this document.

Please note that we have retained the comment numbers from our April 27, 1989 NOD in order to avoid confusion. Therefore, the first new comment in this NOD begins with number 21. Your response should consist of either page changes to the closure plan which incorporate our comments or a revised NOD Response Table to be submitted to our office by December 21, 1990.

Once the enclosed comments are adequately addressed, we will incorporate this plan into the facility wide permit. Approval of this plan will be determined after completion of the public comment period on the facility wide permit.

Technical inquiries regarding this NOD should be directed to Ecology's 300 Area Solvent Evaporator Unit Manager, Mr. Joe Witczak at (206) 438-7557.

Sincerely,

Timothy L. Nord
Hanford Project Manager
Nuclear and Mixed Waste Management

Enclosure

cc: Dan Duncan
Fred Ruck
Administrative Record



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ENCLOSURE

NOD Comments for the 300 Area Solvent Evaporator Closure Plan

No. Comment

- * 4 Deficiency: Section 3.3, Decontamination and Removal of Hazardous Waste Residues, Page 3-7

Ecology's approval of clean closure for the 300 ASE is contingent upon the absence and/or removal of evaporator-originated waste. This requires that 300 ASE contamination be discerned from non-300 ASE contamination. Therefore, it is inappropriate, as suggested in the first paragraph of this page, to not assess the inorganic constituents in the concrete because "it is not possible to discriminate the [inorganic constituents] associated with the 300 ASE from those originating from other operations".

Requirement: The inorganic constituent concentrations must be assessed against the concentrations identified in the concrete sample taken from point 5. In addition, the absence or presence of 300 ASE solvents in the concrete should also be used to assess the origin of the inorganic waste constituents. All data resulting from this sampling effort should be viewed in its entirety to support the claim that the 300 ASE operations have not impacted the concrete pad. It should also be noted that a similar approach will be taken by Ecology when reviewing the soil analyses. If constituents are identified in the baseline soil samples which were also handled in the evaporator, all the sampling data will be reviewed to assess the origin of the baseline contamination.

- * 6 Deficiency: ~~Response: (FROM DISK)~~ Table 3-2, The 300 Area Solvent Evaporator Analytes and Performance Standards, Page 3-6

The halogenated hydrocarbon, polycyclic aromatic hydrocarbon and other organic constituent concentrations cannot be summed and assessed against a 100 ppm clean closure limit. This method is not consistent with the closure performance standards identified in the Dangerous Waste Regulations. WAC 173-303-610(2)

Requirement: Any waste constituents at the 300 ASE identified as listed waste (WAC 173-303-080) or characteristic waste (WAC 173-303-090) may not exceed background (baseline) for clean closure to be approved. All remaining waste constituents must be less than the applicable concentrations identified in the Model Toxics Control Act and dangerous waste designation criteria.

- 15 Comment: Section E-1.4, Action Levels and Baseline Threshold Concentrations, Page E-7

Comment 6 also applies here.

- 17 Comment: Table E-1, The 300 ASE Analytes and Performance Standards, Page E-5

Comment 6 also applies here.

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- 21 Comment: Section 3.3, Decontamination and Removal of Hazardous Waste Residues, Page 3-7

The paragraph beginning with line 16 should be edited to include the fact that the concrete pad, in addition to the soils, will be used as a basis for determining clean closure. This should also be noted in Figure 3-1.

- 22 Deficiency: Section 3.3, Decontamination and Removal of Hazardous Waste Residues, Page 3-7

Ecology's Technical Information Memorandum No. 86-1 is "...used only for foundry slags, foundry baghouse dusts and waste sandblasting grits...". Furthermore, this memorandum "should not be used if it is determined that aquatically toxic constituents other than Cu, Ni, and Zn may be present in the waste (e.g., organotin paints, solvents, etc.)". Therefore, this memorandum is not applicable to the 300 ASE closure.

Requirement: Delete the reference to TIM No. 86-1 on line 31.

- 23 Deficiency: Section 5.2, Closure Cost Estimate, Page 5-2

The applicability of certain financial requirements at the Hanford site is in contention. Therefore, lines 3 and 4 may not be accurate.

Requirement: It has been agreed by the Hanford Project Managers that at least closure cost estimates would be provided to Ecology. The 300 ASE closure cost estimate may be provided to our office in the form of an annual letter between project managers. This same letter should then appear as an appendix to this document. Section 5.2 then need only state "Closure cost estimates can be found in Appendix ___."

- 24 Comment: Section 5.3, Financial Assurance Mechanism, Page 5-2

Financial assurance will be addressed in the site-wide permit. Therefore, Section 5.3 should be deleted.

- 25 Deficiency: Section 5.4 and Section 5.5, Post-Closure Cost Estimate and Financial Assurance Mechanism for Post-Closure Care, Page 5-2

This document is limited to closure activities. Therefore, post-closure activities do not need to be addressed in this document.

Requirement: Delete Sections 5.4 and 5.5 from the text.

- 26 Comment: Section 5.6, Liability Requirements, Page I-69/70

Liability requirements will be addressed in the site-wide permit. Therefore, Section 5.6 should be deleted.

- 27 Comment: Section 6.5.1.3, Notification of Authorities, Page 6-4

Add "-- Actions taken to mitigate the situation" at line 5.

- 28 Deficiency: Section 7-1, Contingency Plan, Page 7-1

The proximity of fire stations and medical service stations do not preclude the need for a RCRA or dangerous waste contingency plan.

Requirement: Delete the sentence beginning with "The proximity to.." on line 9. Replace this sentence with a brief discussion of a sampling team's guideline for applicable contingencies.

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29 Comment: Section 9.8, Other Requirements, Page 9-2

Lines 48 and 49 reference the state's water quality standards. This standard, WAC 173-201, was revised in 1988 and is entitled Water Quality Standards for Surface Waters of the State of Washington. Please correct the cite here and in Chapter 10, References.

30 Deficiency: Appendix A, Part A Application, Page A-4

Page 3-3 of the closure plan indicates that the evaporator had a capacity of 800 gallons. Page 3-1 indicates the evaporator treated about 600 gallons per year. These figures do not correspond to the 220 gallon capacity and 220 gallons per day treatment capacity listed in the Part A Application.

Requirement: The discrepancies between the text and the application must be clarified.

31 Deficiency: Appendix C, Composition and Designation of Solvent Evaporator Waste, Page C-1

Table C-1 does not list vinyl chloride nor dichloroethylene. Furthermore, listed waste designations are not provided in this appendix.

Requirement: Explain the inconsistency between the constituents listed here and those listed in Table 3-2. Listed waste designations must be identified in this appendix.

32 Comment: Appendix E, Soil and Concrete Sampling and Analysis Plan, Figure E-1, Page E-5

Based upon unit manager discussions, uranium is not an indicator of 300 ASE contamination. Therefore, uranium should be deleted from this table as well as from Table 3-2.

33 Comment: Section E-2.1, Assessment Methods, Page E-12

Although the spill assessments are generally conservative, the assumption that the concrete pad is unfractured is not conservative. A brief discussion should be provided indicating the impacts and probabilities of this assumption.

34 Deficiency: Section E-2.4, Evaporator Overflow Spill Scenarios, Page E-14

Typo. Line 43. Replace "above" with "about".

35 Comment: Section E-3.3, Soil Baseline Sampling Locations, Page E-22

Typo. Line 13. Replace "trench boundary" with "closure area".

36 Deficiency: Section E-6.4.6, Chain of Custody Record, Page E-33

The fourth bullet at line 43 is not an acceptable form of security for chain of custody. A sample must meet one of the first three criteria for adequate quality control/quality assurance.

Requirement: Delete line 43.

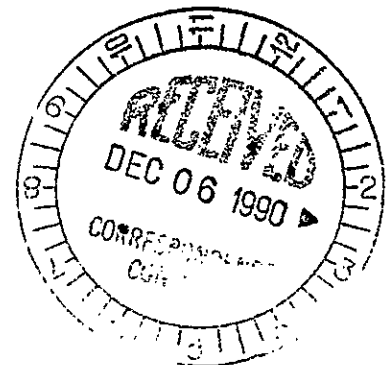
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Subject: NOTICE OF DEFICIENCY: 300 AREA SOLVENT EVAPORATOR CLOSURE PLAN

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