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Department of Energy

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

Incoming: 9200514

JAN 09 1992

91-ERB-225

Mr. Timothy L. Nord  
Hanford Project Manager  
State of Washington  
Department of Ecology  
Mail Stop PV-11  
Olympia, Washington 98504-8711

Mr. Randall F. Smith  
U.S. Environmental Protection Agency  
1200 Sixth Avenue HW-114  
Seattle, Washington 98101



Dear Messrs. Nord and Smith:

CLOSURE POSITION FOR THE NONRADIOACTIVE DANGEROUS WASTE LANDFILL (NRDWL)

This letter transmits the position of U.S. Department of Energy, Richland Field Office (RL) for the closure of NRDWL. RL has determined that closure in place as a landfill is the most viable option for NRDWL. The reasoning behind this determination is addressed in the enclosed two pages.

Based on the information provided in the enclosure, RL plans to proceed in fiscal year 1992 with implementation of the landfill closure as outlined in the NRDWL Closure/Postclosure Plan submitted August 30, 1990, (Tri-Party Agreement Milestone M-20-07).

In support of this closure action, it is requested that the State Of Washington Department of Ecology (Ecology) provide as quickly as possible written approval and/or comments via a Notice-of-Deficiency on the NRDWL Closure/Postclosure Plan.

Also, in phone conversations over the past month with Ecology, RL has not been able to determine who is or will be the acting Ecology Unit Manager for NRDWL. It is imperative to any further progress of NRDWL that Ecology determine its Unit Manager. RL requests that this determination be made as quickly as possible and that a date for a NRDWL Unit Managers Meeting be set.

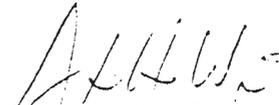
Messrs. Nord and Smith  
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If you have any questions regarding the enclosure and RL's position on NRDWL, please contact Mr. Bob McLeod on (509) 372-0096.

Sincerely,



Steven H. Wisness  
Hanford Project Manager

ERD:RGM

Enclosure

cc w/encl:

W. G. Cox, WHC  
P. T. Day, EPA  
D. L. Duncan, EPA  
M. K. Harmon, EM-442  
R. E. Lerch, WHC  
T. M. Michelena, Ecology  
M. A. Mihalic, WHC  
D. C. Nylander, Ecology  
P. Stasch, Ecology  
T. B. Veneziano, WHC

## CLOSURE OF THE NONRADIOACTIVE DANGEROUS WASTE LANDFILL

The U.S. Department of Energy Field Office, Richland, (RL) has investigated clean closure as an alternative for closure of the Nonradioactive Dangerous Waste Landfill (NRDWL) along with related proposals presented during Unit Managers' meetings by the State of Washington Department of Ecology (Ecology). Prior to development of the closure plan, both clean closure and landfill closure were considered via a plan of action and a risk assessment. The action plan, risk assessment, and other support data were used to develop the current NRDWL Closure/Postclosure Plan which was submitted to Ecology on August 31, 1990. Also, a separate clean closure investigation, which included a review of the safety requirements and waste removal, treatment, disposal/storage and technology options, was conducted in direct response to Ecology letter, T. L. Nord, Ecology, to S. H. Wisness, RL, "Nonradioactive Dangerous Waste Landfill Closure Plan," dated November 2, 1990. The same conclusion, that closure in place as a landfill is the most viable option for NRDWL, was reached during both investigations. The following are some additional factors evaluated as part of the review of the closure alternatives:

- The risk assessment completed for the NRDWL indicates no danger to human health in its current condition. Therefore, a potential system failure (which would be very unlikely) of the proposed landfill closure system would have little or no impact on human health and safety. With respect to the overall environmental, technical, and economic considerations, the landfill closure appears to be the best approach for NRDWL and is consistent with 40 CFR 264 and WAC 173-303-610, -665.
- Removal of all waste material from the landfill would require extensive sampling and analyses, waste designation, repackaging, treatment, and ultimate disposal of the waste and residues at an off-site approved RCRA disposal and/or treatment facility. Closure as a landfill would entail a long-term commitment of resources; however, the total costs would still be less than clean closure. Draft cost estimates developed for clean closure and landfill closure were provided to Ecology in October 1991. The finalized cost estimates are being sent to Ecology in a separate letter.
- Excavation of the waste trenches under current regulations and guidelines could result in a potential breach of the adjoining asbestos disposal trenches. This could result in the spread of contamination, require additional sampling, and create larger volumes of waste to dispose of elsewhere. If the asbestos and sanitary disposal trenches were to be excluded from the clean-closure approach as has been suggested by Ecology during Unit Managers' meetings, and disturbing them during excavation could be avoided, these trenches would still require expensive capping, cover design, placement, and postclosure monitoring in accordance with WAC 173-304.

In addition to the specific closure plan work, RL has provided Ecology with the following information as requested in the November 2, 1990, letter:

- all shipping documents associated with the NRDWL,
- a report on the excavation and inventory of Trench 19N,
- assumptions used to prepare the comparative cost estimates for clean closure and landfill closure and updated red line dangerous waste inventory,
- a table for cross referencing the shipping documents with the dangerous waste inventory.

## CORRESPONDENCE DISTRIBUTION COVERSHEET

Author	Addressee	Correspondence No.
Steven H. Wisness, RL	Timothy L. Nord, Ecology Randall F. Smith, U.S. EPA	Incoming 9200514 XRF: 9155341D

15349

Subject: CLOSURE POSITION FOR THE NONRADIOACTIVE DANGEROUS WASTE LANDFILL  
(NRDWL)

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