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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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February 16, 1993

Mr. R. N. Krekel
U. S. Department of Energy
P.O. Box 550, MSIN A5-15
Richland, WA 99352

Dear Mr. Krekel:

Re: Notice of Deficiency (NOD) for the 105-DR LSFF NOD Response Table, dated November 20, 1992

Enclosed is the latest NOD for the 105-DR LSFF Closure Plan. Most of the significant issues have been resolved. This closure plan should now be revised to incorporate current and previous comments regarding necessary changes. The next submittal of this document shall be Revision 1. Under current TPA schedules, you are allowed 90 days to revise and submit the new closure/post-closure plan. If you need more time than this, you can request an extension within 30 days of receipt of this letter. The revised document must be a closure/post-closure plan as agreed to in previous correspondence and Unit Manager meetings. 30033

I believe significant progress has been made on this closure/post-closure plan, and that completion of this plan may occur in the near future. If you have any questions regarding this letter or the enclosed NOD, please call me at (206) 459-6725.

Sincerely,

Scott E. McKinney
105-DR LSFF Unit Manager
Nuclear and Mixed Waste Management



SEM:dr
Enclosure

cc: Scott Peterson, WHC
Fred Ruck, WHC
Becky Austin, AR
Dan Duncan, EPA
Steve Wisness, DOE
Dave Jansen, Ecology

DEPARTMENT OF ECOLOGY
 NOTICE OF DEFICIENCY FOR
 THE 105-DR LARGE SODIUM FIRE FACILITY
 CLOSURE PLAN NOD RESPONSE TABLE
 Dated November 20, 1992
 February 18, 1993

The following comments/proposals are accepted by Ecology:

2	9	13	16	21	29	41	42	43	45	46	47	48
57	62	68	69	75	81							

The following comments/proposals are accepted by Ecology, pending inclusion of the necessary information in the next revision of the closure plan:

1	3	4	5	6	7	8	10	11	14	15	17	18
19	20	26	28	30	31	32	33	34	35	36	37	40
44	49	50	52	53	54	55	56	59	60	63	64	66
67	70	71	74	76	77	78	79	80	82	83	84	85
86	87	88	89	90								

The following comments/proposals require further modification to the closure plan:

page/line#

22. 6-1/46 Comment: The use of the Toxicity Characteristic Leaching Procedure (TCLP) as the sole designation test for potentially contaminated concrete is proposed. Ecology has reviewed the proposal titled "Determining Inorganic Contamination In Concrete". Ecology's response to this proposal has been presented at the February 10, 1993, Unit Manager's meeting. Briefly, the sole use of the TCLP process for waste designation purposes is not acceptable. Ecology has made an alternate recommendation for the disposition of concrete from Resource Conservation and Recovery Act (RCRA) closure units.

Requirement: The Department of Energy/Westinghouse Hanford Company (DOE/WHC) must review Ecology's comments and make changes to this section of the closure/postclosure plan regarding sampling and designation of potentially contaminated concrete.

23. 6-2/16 Comment: This issue is the same as comment number 22.

Requirement: See the response to comment number 22.

24. 6-2/24 Comment: See comment/requirement number 22 above regarding

concrete closure performance standards.

25. 6-2/30

Comment: The use of health based standards for soils is discussed. Specifically, the use of the Model Toxics Control Act (MTCA), WAC 173-340, is stated. Ecology does not anticipate soil contamination at this unit, but the reference to the correct soil closure standards is appropriate.

Requirement: The language in the draft Hanford Facility Permit also currently calls for the use of MTCA in determining health based closure standards. Inclusion of this language in the revised closure/postclosure plan will be acceptable to Ecology. The closure options for the soil will be background, as determined by the Hanford Sitewide soil background work, the designation limits for dangerous waste in accordance with WAC 173-303-610(2)(b)(ii) closure standards, health based standards derived from the MTCA WAC 173-340-700 method B, or landfill closure.

27. 6-2/43

Comment: See the response to number 25 above.

38. 7-2/34

Comment: The sampling plan as proposed is accepted by both Ecology and DOE. The deferral of the crib remediation to the reactor Decommissioning and Decontamination (D & D) activities is a concern to Ecology. To date there has been no decision made under the operable unit work plans to defer remediation of this crib to the reactor D & D activities. If this is being pursued by DOE/WHC it should be discussed with the appropriate operable unit manager at Ecology.

Requirement: This crib may be remediated under the appropriate operable unit (100-HR-3 or 100-DR-2). Deferral of remediation to the D & D activities has not been agreed to by Ecology. Discussions with the Ecology Unit Manager for operable unit 100-DR-2 confirmed that Ecology will not consider deferral of CERCLA activities to D & D activities. For more information on operable unit activities, contact Jeff Phillips in the Kennewick office, 100-DR-2 Operable Unit Manager.

39. 7-2/49

Comment: See the response to comment number 22.

51. 7-5/18

Comment: A reference to the draft Hanford Facility Permit Quality Assurance/Quality Control (QA/QC) requirements is acceptable. Ecology is not requiring the use of Contract Laboratory Program validation at this unit. As an alternate approach, Ecology will take split samples during the sampling process and have Ecology's splits analyzed, including appropriate data validation.

Requirement: This comment/issue can be resolved if the above is agreeable to DOE/WHC. The QA/QC requirements of SW-846, Volume II, Chapter One must be met. The entire data

package must be submitted to Ecology.

58. 7-10/30

Comment: The sampling and analysis plan will be incorporated into the closure/postclosure plan when it is developed. This is the same process followed for the 183-H Basins Closure/Postclosure Plan.

Requirement: Add language to the closure/postclosure plan that states the completed Sampling and Analysis plan will be incorporated into the closure/postclosure plan. In addition, ensure that there is sufficient detail in the next revision of the closure/postclosure plan to address the requirements in WAC 173-303-610(3)(a)(v).

61. 7-11/21

Comment: See the response in comment number 51.

65. 7-12/38

Comment: The inclusion of the Health and Safety Plan, which is a sub-component of the Hazardous Waste Operations Permit (HWOP), is discussed.

Requirement: When the HWOP is developed it must be incorporated into the closure plan. Ecology will have final approval authority for health and safety related issues regarding this plan. Add language to the closure/postclosure plan that asserts the same. See also comment number 58.

72. 7-15/29

Comment: See comment number 65 above.

73. 7-16/

Comment: See comment number 65 above.

Requirement: Revise this table as necessary to reflect the change to a postclosure plan for the 105-DR LSFF.