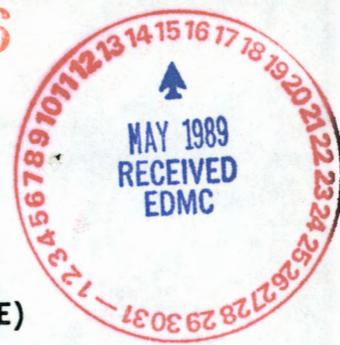


START

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ATTACHMENT 1

NOD Comments for the 300 Area Solvent Evaporator (ASE)

- | <u>NO.</u> | <u>Page</u> | <u>Comment</u> |
|------------|-------------|--|
| 1. | Att. 2 | Typo. Title should read "300 <u>AREA</u> SOLVENT EVAPORATOR", not "300 <u>ASE</u> SOLVENT EVAPORATOR". |
| 2. | 1-1 | Typo. "51 FED. Reg. 7722" should be correctly cited as "51 FR 7722" |
| 3. | 1-3 | The 3000 Area is not labeled on Figure 1-1. Please indicate the location of this area on the map. |
| 4. | 1-10 | The concrete pad which "was used as a storage pad that included storage of solvent barrels" must be considered as part of the 300 ASE or as a separate RCRA storage facility. The 90-day storage exemption does not apply because, as indicated on 1-22, "drums were typically stored from six months to one year before the waste was poured into the evaporator". The extent of the pad which was used for storage must be delineated and addressed in this closure plan and in any applicable 300-FF-2 Operable Unit documentation. (WAC 173-303-200(1)(a)) |
| 5. | 1-22 | See comment #4. |
| 6. | 3-6 | Table 3.2 lists action levels for potential contaminants in the soil beneath the 300 ASE. All of the wastes in group 1 and 2, except petroleum naphtha, are "listed" dangerous wastes. As per Section 5.3 of the Action Plan, closure standards are established by WAC 173-303-610. These standards require, in part, that listed wastes be removed to background concentrations. A justification is required as part of the closure plan to support the use of action levels greater than background. At that time, Ecology will review the appropriateness of such a request. (WAC 173-303-610(2)(b)(i)) |
| 7. | 3-6 | The following comments specifically address the action levels and their sources as given in Table 3.2:
- Source #1. It is not clear what drinking water standard is being referenced. Please specify.
- Source #2. This source refers to MCL's. 1,1,1 trichloroethane, trichloroethylene, and vinyl chloride are identified in 40 CFR 141.50 as Maximum Contaminant Level Goals (MCLG's) and not MCL's. Furthermore, TCE and vinyl chloride have MCLG's of zero which contradicts the values listed in this table. Please clarify. |

S C O O P E R A T I V E

- Source #3. The Code of Federal Regulations (CFR) only has 50 titles. Therefore the reference "51 CFR 1716" does not exist. If this is a reference to a federal register, then the proper cite would be 51 FR 1716. Please correct.
- Source #4. This source does not apply to methylene chloride. Please correct.
- Source #5. It is not clear what standard is being applied nor how it is applied. Please clarify.
- Source #6. See comment on source #3.
- Sources #6,7 & 8. Are these three sources based on the same premise? If so, do not list separately. If not, explain the difference between them.
- Source #8. Zirconium is generally not considered an ignitable waste. Explain why this characteristic is used and why the action level is listed as "greater than baseline".
- Source #9. See comment on source #5. There are two action levels listed for beryllium. What is the criteria for picking one over the other?

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8. 3-7 The last sentence of the third paragraph on this page is incorrect. Notification of findings does not constitute closure. The facility will be considered clean closed under RCRA and WAC 173-303 upon a favorable acknowledgement, by our office, of Energy's certifications of closure. Please correct.
 9. 5-1 It is unclear how notations will be placed in the deed. Is this a generic notation for the entire facility to be entered into the deed and amended as other Hanford sites close? Describe how deed notations will be entered.
 10. 5-1 What is the significance of the November 19, 1985 date in subparagraph (b)? This subparagraph misleads the reader to believe that hazardous waste has only been disposed since November 19, 1985. This subparagraph should indicate the time frame during which hazardous wastes were disposed at this location. Please correct.
 11. 5-1 The text indicates that the notice will be placed in the deed "within 180 days of the start of the post-closure care period". State law requires the notice to be placed in the deed within 60 days of certification of closure. Please correct. (173-303-610(10))
 12. 5-1 Both state and federal regulations are applicable at the Hanford Reservation. Therefore, the term "/or" should be deleted from subparagraphs (b),(c) and (e) as well as from the paragraph preceding subparagraph (a).
 13. C-1 The word "None" in the second line from the bottom of the

page should probably be replaced with "Note". Please clarify or correct.

14. C-2 The final statement on this page regarding halogenated hydrocarbons (HH) is incorrect. A concentration greater than 1% HH is required in order to be regulated as WPO1 (EHW). (WAC 173-303-102(3))
15. E-1 Comments #6 and #7 also apply to the third paragraph of this page.
16. E-1 Typo. "WAC 173-101" should read "WAC 173-303-101".
17. E-4 See comments #6 and #7.
18. E-12 Typo. A comma should be inserted after "300 ASE" in the first bullet of the second paragraph.
19. E-12 The EPA Region X Policy Statement is inadequately referenced. Section 10 of this report should include an entry with a title, date and author for this reference.
20. E-17 and Misc. There is a different sample label proposed in the building 2727-S closure plan than in this plan. Each of these labels are different than the label proposed in the 183-H Basins closure plan. Although sampling labels may be a relatively insignificant matter in the closure process, consistency between reports in sampling procedures and other areas would lend to greater quality control and assurance. An initial effort on your part to "boilerplate" certain sections of closure plans and permit applications would greatly reduce your time in preparing future reports. This effort would also reduce the time required on our part in reviewing these documents. Potential areas for boilerplating are:

- * General facility description
- * Notice placed in deed
- * Certifications of closure/post-closure
- * Certain sampling procedures

In addition to specific areas, it would also be beneficial to use similar formats in these submittals. For example, the closure certifications for the 300 ASE appear as a separate section in the main body of the plan, but they appear as an appendix in the 2727-S plan.

We are not requiring this to be accomplished for the three reports referenced in this comment. We do expect consideration of this matter in future reports. In order to facilitate this effort, our staff is available to work with you in developing pre-approved formats in these or any other areas which you may target.

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