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Incoming: 9205515

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

JUL 23 1992



92-RPB-176

Mr. Paul T. Day
Hanford Project Manager
U.S. Environmental Protection Agency
Region 10
712 Swift Boulevard, Suite 5
Richland, Washington 99352

Mr. David B. Jansen, P.E.
Hanford Project Manager
State of Washington
Department of Ecology
Post Office Box 47600
Olympia, Washington 98504-7600

Dear Messrs. Day and Jansen:

3718-F ALKALI METAL TREATMENT AND STORAGE FACILITY CLOSURE PLAN - NOTICE OF DEFICIENCY RESPONSE TABLE (TS-3-3)

The 3718-F Alkali Metal Treatment and Storage Facility Closure Plan Notice of Deficiency (NOD) Response Table is submitted by the U.S. Department of Energy, Richland Field Office (RL) and the Westinghouse Hanford Company (WHC) for approval by the State of Washington Department of Ecology (Ecology). Submittal of this response table fulfills the August 4, 1992, commitment date.

The NOD response table is in reply to the NOD comments resulting from Ecology's review of closure plan (Ecology letter dated April 29, 1992). Copies of the document will be distributed to representatives of your respective organizations as follows:

- D. L. Duncan, U.S. Environmental Protection Agency (2 copies)
- G. Anderson, Ecology (4 copies)
- D. C. Nylander, Ecology (1 copy).



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Messrs. Day and Jansen
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Should you have any questions, please contact Mr. R. N. Krekel of RL on (509) 376-4264, or Ms. S. M. Price of WHC on (509) 376-1653.

Sincerely,

James D. Bauer
for R. D. Izatt, Program Manager
Office of Environmental Assurance
Permits, and Policy
DOE Richland Field Office

RPB:RNK

R. E. Lerch
R. E. Lerch, Manager
Environmental Division
Westinghouse Hanford Company

Attachment

- cc:
- G. Anderson, Ecology
- D. C. Nylander, Ecology
- D. L. Duncan, EPA
- R. E. Lerch, WHC, (w/o attach)
- M. M. McCarthy, WHC
- T. B. Veneziano, WHC (w/o attach)

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3718-F ALKALI METAL TREATMENT AND STORAGE FACILITY
CLOSURE PLAN REVISION 0
NOTICE OF DEFICIENCY RESPONSE TABLE

No.	Comment/Response	<u>Concurrence</u>
1.	<p><u>6-1/10.</u> We do not consider the records at the Hanford Site to be definitive. If hazardous materials were stored in the facility, then a minimum number of wall samples should be taken.</p> <p>RL/WHC RESPONSE: The wall surfaces will be divided into 1 m² grids. Five percent of these grids will be sampled.</p>	
2.	<p><u>6-1/24.</u> Background will be taken from the sitewide background study now in progress, not from samples taken in the vicinity of this facility.</p> <p>RL/WHC RESPONSE: All references to obtaining background samples will be eliminated and the sitewide background study will be referenced. This strategy differs from other 300 Area closure plans because the number of potential contaminates from the 3718-F Facility is limited and because of the isolated location of the 3718-F Facility.</p>	
3.	<p><u>6-2/37.</u> Since soil remediation will be conducted in accordance with the provisions of the <u>Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA)</u>, contract laboratory procedures (CLP) are standard procedure for <u>Resource Conservation and Recovery Act (RCRA)</u> site closure. Please use the appropriate procedure.</p> <p>RL/WHC RESPONSE: SW-846 procedures are appropriate for RCRA site closures. Any contaminated soil from 3718-F Facility activities (with exception of imminent hazard) will be remediated as part of the 300-FF-3 operable unit under CERCLA. The analytical procedures used under the CERCLA remediation effort will be those that are in effect at the time of remediation.</p>	
4.	<p><u>7-2/26.</u> See 6-2/37</p> <p>RL/WHC RESPONSE: See RL/WHC response to 6-2/37.</p>	

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 NOTICE OF DEFICIENCY RESPONSE TABLE

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No.	Comment/Response	Concurrence
5.	<p><u>7-3/21.</u> See 6-1/24</p> <p>RL/WHC RESPONSE: All references to obtaining background samples will be eliminated and the sitewide background study will be referenced.</p>	
6.	<p><u>7-4/38.</u> Delete the phrase "where they exist".</p> <p>RL/WHC RESPONSE: Comment will be incorporated.</p>	
7.	<p><u>7-5/8.</u> State which EPA document is referred to here.</p> <p>RL/WHC RESPONSE: The EPA document is delineated in Chapter 9, "References". The document is <i>A Compendium of Superfund Field Operations Methods</i>, EPA/540/P-87/001, Section 13.1, "Wipe Sampling."</p>	
8.	<p><u>7-5/10.</u> State what TCLP solvent will be used.</p> <p>RL/WHC RESPONSE: Per SW-846, Method 1311, Toxicity Characteristic Leaching Procedure, for pH < 5.0, extraction fluid #1 is to be used, and for pH > 5.0, extraction fluid #2 is to be used. The pH will be assumed to be approximately 7.0 at the 3718-F Facility wipe sampling locations, therefore extraction fluid #2 will be used.</p>	
9.	<p><u>7-5/33.</u> See 7-5/8.</p> <p>RL/WHC RESPONSE: The EPA document is delineated in Chapter 9, "References". The document is <i>A Compendium of Superfund Field Operations Methods</i>, EPA/540/P-87/001, Section 13.1, "Wipe Sampling."</p>	

3718-F ALKALI METAL TREATMENT AND STORAGE FACILITY
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 NOTICE OF DEFICIENCY RESPONSE TABLE

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No.	Comment/Response	Concurrence
10.	<p><u>7-8/5.</u> Add "Sample bottles selection and preparation shall be in accordance with 40 CFR 136.3." RL/WHC RESPONSE: Comment will be incorporated as follows: Sample bottle selection and preparation shall be in accordance with 40 CFR 136.3, Table II.</p>	
11.	<p><u>7-8/12.</u> 48 hours is too long for some tests, chromium for example. Sampling plans should include tables of maximum holding times for those substances requiring faster action. RL/WHC RESPONSE: Table 7-1 will be modified to include maximum holding times. Shortest holding time for the potential compliance constituents is 14 days.</p>	
12.	<p><u>7-9/14.</u> Duplicates should also be used assess (sic) the precision associated with sample collection preservation and storage. RL/WHC RESPONSE: Comment will be incorporated.</p>	
13.	<p><u>7-9/29.</u> Delete "for soil and concrete samples". RL/WHC RESPONSE: Comment rejected. This wording is necessary to distinguish between field blanks for soil and concrete samples and field blanks for wipe samples.</p>	
14.	<p><u>7-10/17.</u> Add matrix and soil type. RL/WHC RESPONSE: The matrix type will be added, however the soil type will not as no geologist will be present at the time of sampling to make this determination.</p>	

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No.	Comment/Response	Concurrence
15.	<u>7-10/23.</u> Samples are to be in the custody of one person who is solely responsible for the disposition of the sample. RL/WHC RESPONSE: Text will be changed to specify the Field Team Leader as the responsible party.	
16.	<u>7-10/26.</u> Provide chain of custody form. RL/WHC RESPONSE: Form will be provided.	
17.	<u>7-11/4.</u> See 6-2/37 RL/WHC RESPONSE: See RL/WHC response to 6-2/37.	
18.	<u>7-11/5.</u> EPA detection limits are not goals, but limits to be observed during analysis. RL/WHC RESPONSE: Comment will be incorporated.	
19.	<u>7-11/13.</u> The QA/QC criteria for CLP must also be followed where applicable. RL/WHC RESPONSE: Not applicable for RCRA site closures.	
20.	<u>General Comment.</u> Westinghouse and DOE forms are specified throughout this plan. Care should be taken to insure that these forms comply with EPA forms. RL/WHC RESPONSE: WHC and DOE forms do comply with EPA forms.	

CORRESPONDENCE DISTRIBUTION COVERSHEET

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 R. E. Lerch, WHC

Addressee P. T. Day, EPA
 D. B. Jansen, Ecology

Correspondence No. Incoming: 9205515
 XREF: 9156497D

Subject: 3718-F ALKALI METAL TREATMENT AND STORAGE FACILITY CLOSURE PLAN -
 NOTICE OF DEFICIENCY RESPONSE TABLE (TS-3-3)

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