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STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

P.O. Box 1386 • Richland, Washington 99352 • (509) 735-7581

August 25, 1994

Mr. James Rasmussen  
U.S. Department of Energy  
P.O. Box 550  
Richland, WA 99352

Mr. Joe F. Nemec  
Bechtel Hanford, Inc.  
P.O. Box 969  
Richland, WA 99352



Dear Messrs. Rasmussen and Nemec:

Re: Revised Hanford Facility Part A, Form 3 for 100-D Ponds (D-1-1, M-20-40)

The Washington State Department of Ecology (Ecology) is in receipt of the revised Part A (Revision 4, dated 6/30/94). Review of the Form 3 revision indicates that the Part A does not include an identification of the pipes (ancillary equipment as defined by WAC 173-303-040) that carried dangerous wastes to the unit as part of the unit. 37688

Ecology has maintained a position during the 100-D Ponds Closure Plan review and the Data Quality Objectives process for Phase II characterization sampling that the piping is considered part of the unit. As the piping is considered ancillary equipment to this unit, the Resource Conservation and Recovery Act closure plan for this unit will be required to provide a detailed description of the steps needed to remove or decontaminate all dangerous waste residues and contaminated containment system components, equipment, structures, and soils during closure as required by WAC 173-303-610(3)(a)(v).

Although Ecology recognizes that the previous revisions of this Part A did not identify the piping as part of the unit, during the recent closure and characterization sampling plan reviews, this issue has presented programmatic inhibitions. Therefore, Form 3 of the Revised Part A needs to be revised to identify the ancillary equipment as part of the unit to ensure continued progress with the approval of the closure and characterization sampling plans. The revised Part A is requested to be resubmitted by September 30, 1994.

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If you or your staff have any questions regarding this letter, please call Alisa Huckaby of my staff at (509) 736-6034.

Sincerely,



David Lundstrom, Section Manager  
Nuclear Waste Program

DL:AH:mf

- cc: Glen Goldberg, USDOE
- Bill Cox, Bechtel
- Dan Duncan, EPA
- Doug Sherwood, EPA
- Administrative Record - 100 D-Ponds ✓

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