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Department of Energy
Richland Operations Office
P.O. Box 550
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JUL 31 2001

01-RCA-375

Ms. L. E. Ruud, Permit Specialist
Nuclear Waste Program
State of Washington
Department of Ecology
1315 W. Fourth Avenue
Kennewick, Washington 99336

RECEIVED
AUG 14 2001

EDMC

Dear Ms. Ruud:

**FINAL DISPOSITION OF THE HEXONE STORAGE AND TREATMENT FACILITY
(HEXONE TANKS)**

DOE requests that Ecology remove the Hexone Tanks from the 2002 permit modification cycle, and link submittal of the closure plan to the 200-IS-1 Operable Unit schedule as provided for in the Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) Action Plan. The 276-S-141/142 Hexone Tanks is an interim status Treatment Storage and Disposal (TSD) Unit. The tanks are included as a waste site in the 200-IS-1 Resource Conservation Recovery Act (RCRA) Past Practice (RPP) Operable Unit under the Tri-Party Agreement, as listed in DOE/RL-98-28, 200 Area Remedial Investigation/Feasibility Study Implementation Plan Environmental Restoration Program, April 1999.

The Tri-Party Agreement Action Plan, Section 3.3, recognizes that there are some TSD units that will be assigned to operable units. The action plan allows for the coordination of past practice site investigation and RCRA closure to efficiently implement applicable regulations. Appendix C of the Tri-Party Agreement identifies the Hexone Tanks as a TSD unit where closure and permitting activities are to be coordinated with past practice investigation and remediation activities. The Permit Modification Schedule (Attachment 27) included in Revision 7 of the Dangerous Waste Portion of the RCRA Permit, identified the Hexone Tanks as one of the Hanford units to be included in the 2002 permit modification cycle.

At present, the U.S. Department of Energy (DOE) is working with the respective managers of the State of Washington Department of Ecology (Ecology) and the U.S. Environmental Protection Agency (EPA) to prioritize Remedial Investigation/Feasibility Study activities in the 200 Area. The Hexone Tanks are presently undergoing an engineering alternatives study for an interim stabilization effort agreed to by Ecology. In meetings with Bryan Foley of DOE, both Ecology and EPA supported the postponement of the final closure of the tanks to coordinate with the 200-IS-1 Operable Unit. The upcoming interim stabilization effort will ensure the tanks pose no threat to human health or the environment, and will not preclude any closure option that may be selected for the 200-IS-1 RPP.

Ms. L. E. Ruud
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If you have any questions, please call Ellen Mattlin, of my staff, at (509) 376-2385.

Sincerely,



Joel Hebdon, Director
Regulatory Compliance and Analysis Division

RCA:EMM

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