

START



Department of Energy

9101705

Richland Operations Office
P.O. Box 550
Richland, Washington 99352

91-EAB-046

MAR 26 1991

Mr. Paul T. Day
Hanford Project Manager
U.S. Environmental Protection Agency
Region 10
712 Swift Boulevard, Suite 5
MSIN: B5-01
Richland, Washington 99352

Mr. Timothy L. Nord
Hanford Project Manager
State of Washington
Department of Ecology
Mail Stop PV-11
Olympia, Washington 98504-8711



Dear Messrs. Day and Nord:

2727-S NONRADIOACTIVE DANGEROUS WASTE STORAGE FACILITY CLOSURE PLAN - REQUEST FOR CONCURRENCE REGARDING CLOSURE STRATEGY

As discussed during the February 27, 1991, Unit Managers Meeting for the 2727-S Nonradioactive Dangerous Waste Storage Facility, plans are currently being developed to accelerate the remediation of this waste management unit.

The proposed plans are to remove the metal building, the concrete pad underneath the building, and six inches of soil underneath the pad. This material will then be disposed of as dangerous waste in an offsite permitted waste management unit. Attached to this letter is a description of the activities being proposed. These activities may commence upon receiving a letter of concurrence from the State of Washington Department of Ecology (Ecology).

A revised closure plan incorporating this proposal will be submitted to Ecology and the U.S. Environmental Protection Agency for approval; however, concurrence on this proposal will expedite clean closure of the facility.

91121720350

Messrs. Day and Nord

-2-

MAR 26 1991

If you have questions regarding this request, please contact Ms. S. L. Trine of the U.S. Department of Energy, Richland Operations Office on (509) 376-6943, or Ms. C. J. Geier of the Westinghouse Hanford Company on (509) 376-2237.

Sincerely,

E A Bracken

E. A. Bracken, Director
Environmental Restoration Division
Richland Operations Office

ERD:SLT

R E Lerch

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

Attachment:
Closure Plan Strategy Description

cc w/att:

D. L. Duncan, EPA

J. J. Witzak, Ecology

~~R. E. Lerch, WHC, w/att~~

9151906.doe

91121920351

March 12, 1991

PROPOSAL FOR CLOSURE OF THE 2727-S NONRADIOACTIVE DANGEROUS
WASTE STORAGE FACILITY

I. Introduction

The 2727-S Nonradioactive Dangerous Waste Storage Facility (NRDWSF) consisted of a 20 by 40 foot metal building constructed on a 60 by 100 foot concrete pad. Beginning on March 14, 1983, the waste management unit received and stored a wide variety of containerized wastes regulated under the requirements of WAC-173-303 and 40 CFR 260-268. Containerized wastes were collected at the waste management unit until there was a sufficient quantity to efficiently transport the waste to an offsite TSD Facility. Physical handling of waste materials and opening of containers was not performed routinely at the waste management unit. Waste management unit operation ended on December 30, 1986. Existing process knowledge indicates a low potential for chemical contamination exceeding regulatory limits.

II. General Waste Management Unit Closure Actions

Selected wastes generated from closure of the 2727-S NRDWSF shall be disposed of in a RCRA permitted landfill, even if contamination is below detectable and regulatory limits. The 2727-S NRDWSF proposed closure actions can be divided into the three sections described below:

A. Storage Building Section

The storage building section includes a 20 by 40 foot metal structure with interior wallboard, insulation, and electrical wiring.

The building has a personnel door at each end and windows on all four walls. The structure is lined internally with insulation and wallboard. The wall board covers only the upper half of the walls, while the insulation lines both upper and lower walls. Any fluorescent light ballasts and fluorescent light tubes present in the building will be removed by WHC prior to landfill's acceptance of wastes.

Local regulatory agencies will allow the building to be dismantled and disposed of in a RCRA Permitted Landfill only. Because process knowledge indicates a limited potential for chemical contamination of the structure, WHC will designate the structure as "nonregulated" per the requirements of WAC-173-303 and CFR Title 40, parts 260-271. If required in the landfill operators Waste Analysis Plan, WHC will provide the landfill operator with samples of the structure for waste profile verification. The

9112120372

landfill operator shall supply WHC with copies of the laboratory reports documenting profile verification analysis.

The facility structure, including the wallboard, insulation and electrical wiring is estimated to produce approximately 42 cubic yards of wastes.

B. Secondary Containment Section

The Secondary Containment Section consists of the following:

1. The 24 by 44 foot portion of concrete directly underneath the building structure (the 24 by 44 foot estimate includes the concrete pad extending in a 2 foot perimeter around the building exterior). The concrete is estimated to be four inches thick.
2. Six inches of the soil underlying the 24 by 44 foot section of concrete described above.

Local regulatory agencies will allow the waste addressed in the "Secondary Containment Section" to be disposed of in a RCRA Permitted Landfill only.

WHC will provide the landfill operator with two samples of the concrete pad. The landfill operator shall analyze the samples to the extent necessary for proper designation of the waste per WAC-173-303 and CFR Title 40, parts 260-271. Analysis of the two samples must also be sufficient for profile verification and acceptance of the waste at the landfill operator's facility. The landfill operator shall supply WHC with copies of the laboratory reports documenting the samples analytical results. WHC will use the analytical reports for designation of the Secondary Containment Section. Process knowledge indicates that the waste in the Secondary Containment Section will not exceed the regulatory limits specified in WAC-173-303 and CFR Title 40, parts 260-271.

The concrete pad under the building, including the two foot perimeter exterior section, is estimated to produce 13 cubic yards of waste. The soil under the concrete pad and two foot exterior section is estimated to produce 20 cubic yards.

C. Exterior Pad Section

The Exterior Pad Section consists of any remaining portions of concrete and underlying/surrounding soils not addressed in the section above. These portions of the pad and underlying soil shall be disposed of only if sampling and analysis performed by

91121920353

WHC reveals the presence of contamination above approved Washington State Department of Ecology levels.

These portions will be considered remediated by local regulatory agencies if contamination above approved Washington State Department of Ecology levels is not found.

If contamination levels specified by regulatory agencies are exceeded, WHC will properly designate the waste per WAC-173-303 and CFR Title 40, parts 260-271.

The remaining portions of the exterior concrete pad, including reinforcing steel, is estimated to produce 65 cubic yards of waste. The surrounding/underlying soils are estimated to produce 172 cubic yards of waste.

91121920374

CORRESPONDENCE DISTRIBUTION COVERSHEET

Author

Addressee

Correspondence No.

T. A. Wilczek, 6-8556
J. R. Laws, 6-7508

P. T. Day, EPA
T. L. Nord, Ecology

Incoming: 9101705
Reference #9151906

**Subject: 2727-S NONRADIOACTIVE DANGEROUS WASTE STORAGE FACILITY CLOSURE PLAN -
REQUEST FOR CONCURRENCE REGARDING CLOSURE STRATEGY**

INTERNAL DISTRIBUTION

Approval	Date	Name	Location	w/att
----------	------	------	----------	-------

		Correspondence Control	A3-01	
		M. R. Adams	H4-55	
		R. J. Bliss	B3-04	
		L. C. Brown	H4-51	
		R. A. Carlson	H4-55	
		G. D. Carpenter	B2-16	
		D. G. Farwick	T4-10	
		K. R. Fecht	H4-56	
		C. J. Geier	H4-57	
		R. J. Landon	B2-19	
		J. R. Laws	H4-57	
		R. E. Lerch (Assignee)	B2-35	
		D. W. Lindsey	R2-82	
		L. L. Powers	B2-35	
		M. R. Romsos	N3-11	
		F. A. Ruck III	H4-57	
		D. R. Speer	R2-77	
		R. R. Thompson	L4-88	
		L. W. Vance	H4-16	
		M. A. Wasemiller	H4-55	
		T. A. Wilczek	H4-57	
		B. D. Williamson	B3-15	
		EDMC	H4-22	
		JRL:TAW/LB	H4-57	



Attachment Same as
Letter Number 9151906

91121720375