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STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

1315 W. 4th Avenue • Kennewick, Washington 99336-6018 • (509) 735-7581

February 5, 1998

Mr. James Rasmussen  
United States Department of Energy  
P.O. Box 550, MSIN: A5-15  
Richland, WA 99352



Dear Mr. Rasmussen:

Re: Conditional Hazardous Debris Rule Contained-In Determination for Sluice Gates, Head Works Box Inlet Pipe, and Underlying Soil Located Within the 300 Area Process Trenches (300 APT)

All contained-in determinations must be based on statistically adequate site-specific data and must, at a minimum, consider the concentration and risk of each constituent for which the hazardous waste was listed and any possible breakdown products.

The following 300 APT contained-in determinations considered all available site-specific data:

1. Letter to James Rasmussen and Michael Hughes, *Contained-In Determination for Concrete Debris from the 300 Area Process Trenches (APT) Weir Structure*, dated December 12, 1997.
2. Letter to James Rasmussen, *Conditional Contained-In Determination for the 300 Area Process Trenches*, dated May 15, 1997.

The Washington State Department of Ecology (Ecology) believes that since the two sluice gates and inlet piping were integral parts of the weir structure, the data collected for performing the previous contained-in determinations can be used for this determination as well. The soils directly beneath the inlet piping can also be considered as having similar contamination. The specific section of inlet piping being considered for this determination is discussed in the *300 Area Process Trenches Modified Closure/Postclosure Plan*, DOE/RL-93-73, Rev. 1, 1995. The 24-inch diameter clay piping was originally part of the entire process sewer effluent system. This determination, however, will only consider the section of pipe, (approximately 20 linear feet) running from the edge of the 300-FF-1 operable unit boundary up to where it previously connected to the weir structure. The soil considered in this determination is limited to approximately 90 loose cubic yards (LCY) that was removed from beneath the clay piping. For the purpose of clarifying the regulatory basis for this determination, Ecology considers both, the piping and the gates, as appropriately meeting the definition of debris as stipulated by the Hazardous Waste Debris Rule. Furthermore, the soil is considered as geologic media, as defined by Ecology's internal letter, *Contained-in Policy*, dated February 19, 1993.

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Based on review of previous analytical data, Ecology is granting this contained-in determination for two sluice gates, inlet piping, and associated soil. Future management of the gates, piping, and 90 LCY of soil will not require consideration of listed waste codes. Please note that this determination was made on the premise that the piping, sluice gates, and soil will be disposed of in the Environmental Restoration and Disposal Facility (ERDF) pursuant to the 300 APT Modified Closure Plan and the 300 FF-1 Record Of Decision. If the U.S. Department of Energy (USDOE) is considering other disposal options other than ERDF then this determination will require re-assessment based on those options.

Use of this contained-in determination is specifically limited to the 300 APT debris and soil previously identified in this letter. Any remaining waste streams within the 300 APT will require separate contained-in demonstrations if listed waste code removal is necessary.

If you have questions or concerns, please contact me at (509) 736-3012.

Sincerely,



Ted A. Wooley, 300 APT Project Manager  
Nuclear Waste Program

TAW:ch

cc: Bob Mcleod, USDOE  
Dave Einan, EPA  
Jeff James, BHI  
Administrative Record: 300 APT

bcc: Tom Cusack, Ecology  
Jeanne Wallace, Ecology