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

JUN 19 1996

96-EAP-135

Mr. Moses N. Jaraysi
200 Area Unit Supervisor
Nuclear Waste Program
State of Washington
Department of Ecology
1315 West Fourth Avenue
Kennewick, Washington 99336

Mr. Joseph J. Witczak
Unit Supervisor
Regulatory and Technical
Support Unit
Nuclear Waste Program
State of Washington
Department of Ecology
P.O. Box 47600
Olympia, Washington 98504-7600



Dears Messrs. Jaraysi and Witczak:

CLOSURE CERTIFICATION FOR THE 105-DR LARGE SODIUM FIRE FACILITY
CLOSURE (T-1-1)

Enclosed are the completed Closure Certifications for the 105-DR Large Sodium Fire Facility. These signatures certify that closure of the 105-DR Large Sodium Fire Facility was implemented in accordance with the specifications of the approved closure plan. These certifications are required by the Washington Administrative Code 173-303-610(6) and were prepared in accordance with Section 7.9 of the 105-DR Large Sodium Fire Facility Closure Plan, and Condition V.10.B.e of the Hanford Facility Resource Conservation and Recovery Act (RCRA) Permit.

The 105-DR Large Sodium Fire Facility is located in the 100-D Area of the Hanford Site. It is collocated within the 105-DR Reactor. This unit operated from 1972 until 1986 as a RCRA treatment, storage, and/or disposal unit for reactive dangerous waste. Closure activities were completed in 1996 in accordance with the closure plan.

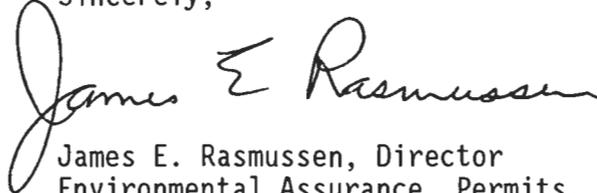
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Messrs. Jaraysi and Witczak
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Should you have any questions, please contact Ellen Mattlin, RL, on (509) 376-2385, Roger Bowman, WHC, on (509) 376-4876, or Tom Dillhoff, WHC, on (509) 376-0441.

Sincerely,



James E. Rasmussen, Director
Environmental Assurance, Permits,
and Policy Division
DOE Richland Operations Office

EAP:EMM



Edward F. Loika, Director
FFTF Transition Project
Transition Projects
Westinghouse Hanford Company

Enclosures:

1. PE Certification of Closure
for the 105-DR Large Sodium
Fire Facility
2. Owner/Operator and Co-Operator
Certification for the 105-DR
Large Sodium Fire Facility

cc w/encl:

EDMC, H6-08
R. Bowman, WHC
R. Jim, YIN
S. McKinney, Ecology
D. Powaukee, NPT
S. Price, WHC
D. Sherwood, EPA
J. Wilkinson, CTUIR
M. Wilson, Ecology

cc w/o encl:

W. Dixon, WHC

ENCLOSURES

**PE Certification of Closure for the
105-DR Large Sodium Fire Facility**

and

**Owner/Operator and Co-Operator Certification for the
105-DR Large Sodium Fire Facility**

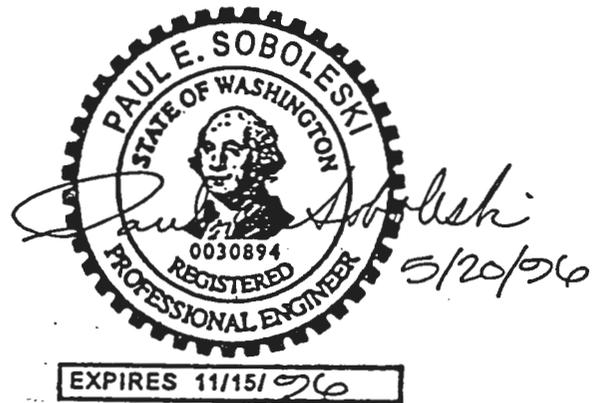
**PROFESSIONAL ENGINEER'S CERTIFICATION STATEMENT
105-DR LARGE SODIUM FIRE FACILITY CLOSURE PLAN CERTIFICATION**

I, the undersigned, an independent registered professional engineer, hereby certify that I have reviewed the approved Closure Plan and supporting closure documentation for the 105-DR Large Sodium Fire Facility Closure Plan, and to the best of my information and belief, closure activities were performed in accordance with the specifications in the approved Closure Plan. This certification is based solely on a review of documents and limited on-site observation by myself and/or my designee, as described in the attached Specifications and Limitations of Professional Engineer's Certification.

The above statements are true and complete to the best of my knowledge and within the limits of professional judgment under the prevailing standards of practice on this 20th day of May, 1996.

Paul E. Soboleski

Paul E. Soboleski, P.E.
Washington #30894
CH2M HILL



**SPECIFICATIONS AND LIMITATIONS OF
PROFESSIONAL ENGINEER'S CERTIFICATION
105-DR LARGE SODIUM FIRE FACILITY CLOSURE PLAN CERTIFICATION**

The Hanford Site is owned by the United States Government and operated by the Department of Energy (DOE), Richland Operations. Westinghouse Hanford Company (WHC) is a major contractor to the DOE and serves as co-operator of the 105-DR Large Sodium Fire Facility, the unit addressed in the State-approved closure plan. The 105-DR Large Sodium Fire Facility was closed over a period of time extending from 1995 to 1996.

The document entitled 105-DR Large Sodium Fire Facility Closure Plan (DOE/RL-90-25, Revision 2) was approved by the Washington State Department of Ecology (Ecology). This approval was part of Modification A-prime of the final permit for management of dangerous waste at the Hanford Site (Permit Number WA7890008967). This permit has two parts. The first part is the Dangerous Waste Portion of the Resource Conservation and Recovery Act Permit for the Treatment, Storage, and Disposal of Dangerous Waste, and is issued by Ecology. The second part is the Hazardous and Solid Waste Amendments Portion of the Resource Conservation and Recovery Act Permit for the Treatment, Storage, and Disposal of Hazardous Waste, and is issued by the EPA. The original permit (less Modification A) became effective on September 28, 1994. Modification A was issued on April 28, 1995, and became effective on May 28, 1995. Modification A-prime was issued on August 30, 1995, and became effective on September 29, 1995.

Paul E. Soboleski, P.E., was provided the approved Closure Plan by Hazardous Waste and Materials Services of WHC. The direct contact for Mr. Soboleski at WHC was Mr. Jason G. Adler. The document, along with sampling plans, field logbooks, sampling reports, analytical results documentation, and data validation packages for soil and water sampling and analysis for the closure plan activities, have been represented during conversation and in correspondence from WHC individuals to be the full, accurate, complete, and representative record of closure activities at the 105-DR Large Sodium Fire Facility as performed by WHC staff and contractors (see Page 2 of this Attachment for a list of documents reviewed).

Paul E. Soboleski, along with his designee, Philip B. Tolley, performed a review of the documents provided by WHC Hazardous Waste and Materials Services on closure of the 105-DR Large Sodium Fire Facility. Review of these documents was conducted to determine if the facility was closed in accordance with the specifications in the approved Closure Plan, as described above. No supervisory or verification activities were performed (e.g., independent data collection and/or validation, etc.); the activity was limited to periodic site visits by Mr. Soboleski and/or his designee, and review of those documents provided to CH2M HILL by WHC.

Relative to following the requirements of the Closure Plan, there is one issue that has not been resolved to the satisfaction of the Professional Engineer. That issue relates to a plug of bicarbonate solid that was retained on a burn pan that was cleaned and removed from the 105-DR facility. It is possible that the bicarbonate plug was of a mass, and therefore concentration, sufficient to exceed percent retained requirements for cleaning of the equipment. This issue remains unresolved at the time of this certification.

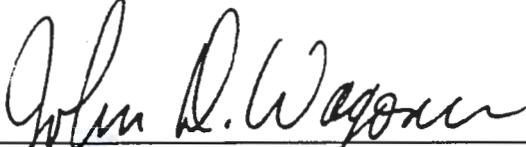
DOCUMENTS REVIEWED FOR
PROFESSIONAL ENGINEER'S CERTIFICATION
105-DR LARGE SODIUM FIRE FACILITY CLOSURE PLAN CERTIFICATION

General

- 1) 105-DR Large Sodium Fire Facility Closure Plan
(DOE/RL-90-25, Revision 2)
- 2) 105-DR Large Sodium Fire Facility Soil Sampling Data Evaluation Report
(WHC-SD-EN-TI-307, Revision 0)
- 3) 105-DR Large Sodium Fire Facility Closure Activities Evaluation Report
(WHC-SD-EN-EV-034, Revisions 0 and 1)
- 4) Data Validation Report for 105-DR Large Sodium Fire Facility
(SDG W0635-QES-392, LATA VW403.97)
- 5) Data Validation Report for 105-DR Large Sodium Fire Facility
(SDG W0638-QES-393, LATA VW403.98)
- 6) 105-DR Large Sodium Fire Facility Decontamination, Sampling, and Analysis Plan
(WHC-SD-EN-AP-186, Revision 0)
- 7) Memorandum from Jason Adler to Paul Soboleski, dated May 6, 1996, regarding documentation of sampling of the wash water. Attached to the memorandum were the following documents:
 - a) Hazardous Waste Disposal Checklist, dated 3/10/96
 - b) Hazardous Waste Disposal Analysis Record (HWDAR), dated 3/06/96
 - c) Solid Waste Engineering Analysis for Request #27395, dated 3/01/96
 - d) Waste Storage/Disposal Request, dated 2/26/96
 - e) Analytical Data Package for Chemical Analysis, prepared for WHC by Quanterra Environmental Services, dated 1/26/96
- 8) Project File Checklist, dated 9/21/95, containing sketches and photocopies of photographs of a soil sampling event outside and to the south of the 105-DR facility (Area 3 and 7, as identified in the approved Closure Plan). Also included in this checklist were Chain of Custody (COC) forms for the soil samples, Request for Special Analysis (RSA) forms, rad screen reports, sampling authorization form, and the 105-DR Large Sodium Fire Facility Decontamination, Sampling, and Analysis Plan (WHC-SD-EN-AP-186, Revision 0), also noted in Item 6, above.
- 9) Field Logbook, entries logged by the Professional Engineer's designee and the logbook maintained by CH2M HILL.

CLOSURE CERTIFICATION
FOR
105-DR LARGE SODIUM FIRE FACILITY

We, the undersigned, hereby certify that 105-DR Large Sodium Fire Facility closure activities were performed in accordance with the specifications in the approved Closure Plan, except as discussed in the attached Specifications and Limitations of the Professional Engineer's Certification.



Owner/Operator
John D. Wagoner, Manager
U.S. Department of Energy
Richland Operations Office

6/19/96
Date



Co-operator
Ronald J. Bliss, Manager & Vice President
Transition Projects
Westinghouse Hanford Company

5/23/96
Date

EDMC
2440 STEVENS
% DEBRA A. ISOM
BCSR

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