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Department of Energy

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

95-PCA-318

MAY 25 1995

Mr. David L. Lundstrom
Section Manager
200 Areas
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

Dear Messrs. Lundstrom and Witczak:

CLOSURE CERTIFICATION FOR THE 300 AREA SOLVENT EVAPORATOR (T-3-1)

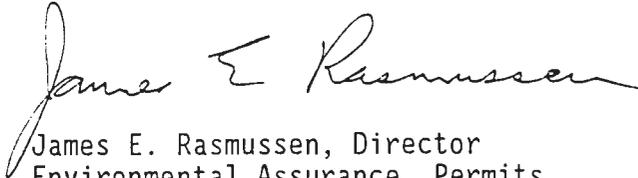
Enclosed are the completed Closure Certifications for the 300 Area Solvent Evaporator (300 ASE). These certifications have been signed by an independent, registered professional engineer; by the Westinghouse Hanford Company (WHC) as facility co-operator; and by the U.S. Department of Energy, Richland Operations Office (RL) as facility owner-operator. These signatures certify that the closure of the 300 ASE was implemented in accordance with the specifications of the closure plan, as modified. These certifications are required by Washington Administrative Code 173-303-610(6), and were prepared in accordance with Chapter 4 of the 300 ASE Closure Plan and Condition V.2.B.f of the Hanford Facility Resource Conservation and Recovery Act (RCRA) Permit.

The 300 ASE was a tank treatment unit located in the 300 Area of the Hanford Site. This unit operated from 1975 until 1986 as a RCRA treatment, storage, and/or disposal (TSD) unit. Closure activities were completed in 1994 in accordance with the closure plan and included closure verification soil and concrete sampling and analysis. The results of these sampling and analyses activities show that the unit can be clean closed. Therefore, we request that Ecology inform the U.S. Environmental Protection Agency Resource Conservation Recovery Information System that this TSD unit is "closed". We also request the reissuing of the Part A, Form 3 with "CLOSED" stamped on it along with the date Ecology responds to this letter.



Should you have any questions regarding this closure certification, please contact Ms. E. M. Mattlin, RL, on (509) 376-2385, or Mr. F. A. Ruck III, WHC, on (509) 376-9876.

Sincerely,



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

EAP:EMM



William T. Dixon, Director
Environmental Services
Westinghouse Hanford Company

Enclosures:

1. Closure Certification for the
300 Area Solvent Evaporator
2. Professional Engineer's
Certification Statement
Hanford Site 300 Area
Solvent Evaporator Closure

cc w/encl:

EDMC, H6-08

Administrative Record

R. Cordts, Ecology

D. Duncan, EPA

R. Jim, YIN

D. Powaukee, NPT

S. Price, WHC

F. Ruck III, WHC

D. Sherwood, EPA

J. Wilkinson, CTUIR

cc w/o encl:

W. Dixon, WHC

**PROFESSIONAL ENGINEER'S CERTIFICATION STATEMENT
HANFORD SITE 300 AREA SOLVENT EVAPORATOR CLOSURE**

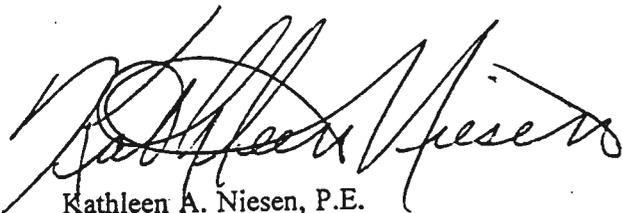
I, the undersigned, an independent registered professional engineer, hereby certify that I have reviewed the approved Closure Plan and supporting closure documentation for the 300 Area Solvent Evaporator, and, to the best of my information and belief, closure activities were performed in accordance with the specifications in the approved Closure Plan, augmented by the approved Unit Managers' Meeting (UMM) minutes of July 13, 1993, April 1, 1994, June 8, 1994, and August 18, 1994, with one exception and one additional augmentation, which are discussed below. These closure activities consisted of soil and concrete sampling and analysis. This certification is based solely on a review of documents as described in the attached specification.

The UMM minutes provided for: 1) dropping the local (300 Area) background samples for the soil sampling work and using Hanford site-wide background values instead, and 2) evaluation, validation, and use of an innovative concrete sonification procedure for VOC extraction before analysis.

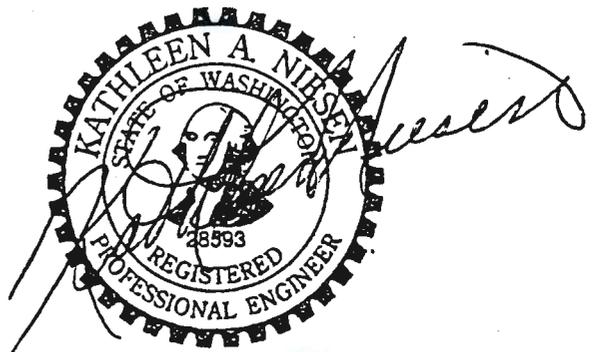
The exception to the approved Closure Plan specifications during closure activities was that the chemical compound ethyl acetate was not an analyte in the analysis of the collected soil samples. The reason for this exception is presented in the soil sampling report. The report states that, with the method used, ethyl acetate would be expected to be reported as a tentatively identified compound.

The augmentation of the approved Closure Plan involved sampling procedures, and size and number of the concrete samples that were taken. Specifically, the size of the concrete cores was increased from 1.3 inches in diameter to 4 inches in diameter and the number of samples at each sampling location was increased. These decisions were represented as supporting concrete sample preparation and analysis needs and have been interpreted as being consistent with the approved Closure Plan.

The above statements are true and complete to the best of my knowledge and within the limits of professional judgement under the prevailing standards of practice on this 27th day of April, 1995.



Kathleen A. Niesen, P.E.
Washington #28593
EnviroIssues



EXPIRES: 12/16/96

**SPECIFICATIONS AND LIMITATIONS OF PROFESSIONAL
ENGINEER'S CERTIFICATION
HANFORD SITE 300 AREA SOLVENT EVAPORATOR CLOSURE**

The Hanford Site 300 Area Solvent Evaporator was demolished and closed under the direction of Westinghouse Hanford Company (WHC) employees over a period extending from 1985 through 1994.

A document entitled 300 Area Solvent Evaporator Closure Plan (DOE/RL-88-08 Revision 3B) was approved by the Washington State Department of Ecology (Ecology) and the U.S. Environmental Protection Agency (EPA). This approval was part of the final permit for management of dangerous waste at the Hanford Site. 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 permit became effective on September 28, 1994. The approved Closure Plan was augmented both before and after the permit's effective date through Unit Managers' Meeting (UMM) minutes signed by representatives of the Department of Energy (DOE), WHC, EPA Region 10, and Ecology. These UMM minutes provide the basis to: 1) drop the local (300 Area) background sampling and use Hanford site-wide background values instead, and 2) use an innovative concrete sonification VOC extraction procedure before analysis. 24254

The approved Closure Plan, copies of four UMM minutes, and a letter dated October 27, 1994, from the DOE Richland Operations office notifying Ecology (under permit condition V.2.B.a) that closure of the unit had begun, were provided by WHC, RCRA Unit Closures to Kathleen A. Niesen of EnviroIssues. (The direct contact at WHC was Andrea L. Prignano, Principal Scientist, RCRA Unit Closures. Fred A. Ruck III is the Manager of WHC RCRA Unit Closures.) These six documents have been represented during conversation and in correspondence from WHC as comprising the complete approved Closure Plan for the 300 Area Solvent Evaporator treatment unit.

Sampling plans, field logbooks, sampling reports, analytical results documentation, and validation data packages for a soil sampling and analysis Closure Plan component and a concrete sampling and analysis component also have been provided to Kathleen A. Niesen of EnviroIssues by WHC RCRA Unit Closures. These documents have been represented in conversation and correspondence from WHC to be the full, accurate, complete and representative record of closure activities at the 300 Area Solvent Evaporator as performed by WHC staff and contractors. (See attached list of documents reviewed.) The approved Closure Plan (referenced above) states that the dismantling and removal of the solvent evaporator unit and the associated storage drums occurred prior to the preparation of the Closure Plan. No documentation other than the historical information provided in the approved Closure Plan has been provided to document these activities and no actions were specified within the approved Closure Plan regarding such activities.

Kathleen A. Niesen performed a review of the documents provided by WHC RCRA Unit Closures on closure of the 300 Area Solvent Evaporator. Review of these documents was conducted to determine if the treatment unit was closed in accordance with the specifications in the approved Closure Plan, as described above. No on-site, supervisory, or verification activities were performed (e.g., site visit, independent data collection); the activity was limited to review of those documents provided to EnviroIssues by WHC.

**DOCUMENTS REVIEWED FOR
SPECIFICATIONS AND LIMITATIONS OF PROFESSIONAL
ENGINEER'S CERTIFICATION
HANFORD SITE 300 AREA SOLVENT EVAPORATOR CLOSURE**

- 1) 300 Area Solvent Evaporator Closure Plan
(DOE/RL-88-08, Revision 3B) 24254
- 2) Soil Characterization at the 300 Area Solvent Evaporator Closure Site
(WHC-SD-EN-TI-273, Revision 0) 37834
- 3) Concrete Characterization for the 300 Area Solvent Evaporator Closure Site
(WHC-SD-EN-TI-296, Revision 0) 40594
- 4) Letter from James E. Rasmussen (DOE/RL) and William T. Dixon (WHC) to David L. Lundstrom (Ecology) and Joseph J. Witczak (Ecology). Notification of Initiation of Closure Activities for the 300 Area Solvent Evaporator (T-3-1). Dated: October 27, 1994 38913
- 5) Unit Managers' Meeting minutes from meeting held July 13, 1993, 10:00 am to 11:30 am T-3-1 30213
- 6) Unit Managers' Meeting minutes from meeting held April 1, 1994, 3:00 pm to 4:00 pm 36778
- 7) Unit Managers' Meeting minutes from meeting held June 8, 1994, 3:00 to 4:00 pm 37544
- 8) Unit Managers' Meeting minutes from meeting held August 18, 1994, 3:30 to 4:30 pm ✓
- 9) Copy of Field Logbook Number EFL-1095, pages 1 through 22 inclusive, received by J.G. Lucas (55152) on 8-6-93 with notes dated 8-10-93 ✓
- 10) Letter from Steven H. Wisness (DOE/RL) and R. E. Lerch (WHC) to Joseph J. Witczak (Ecology) and Douglas R. Sherwood (EPA). Submittal of Validated Data for the 300 Area Solvent Evaporator Soil Sampling (T-3-1). Dated: April 30, 1994 40065
- 11) Transmittal letter from Donald J. Smith (LATA) to Karl Pool (WHC) and accompanying report. Data Validation Report for Analytical Results for 300 Area Solvent Evaporator (SDG B090C3-TMA-549). Dated: March 7, 1994 18638
- 12) Transmittal letter from Donald J. Smith (LATA) to Karl Pool (WHC) and accompanying report. Data Validation Report for Analytical Results for 300 Area Solvent Evaporator (SDG B090C3-TMA-549), Revision 1. Dated: April 12, 1994 27277
- 13) Copy of Field Logbook Number EFL-1095, pages 23 through 43 inclusive, notes by J. G. Lucas (55152). Dated: 4-27-94, 4-29-94, 5-2-94, 5-2-94, 4-22-94, 5-10-94, and 5-13-94. ✓
- 14) Transmittal letter from Janet M. Jones (LATA) to Karl Pool (WHC) and accompanying report. Data Validation Report for Analytical Results for 300A Solvent Evaporator (SDG B0B0Q1-TMA-759). Dated: August 23, 1994 ✓
- 15) Memorandum from Susan Manchester (Golder) to 300 Area Solvent Evaporator Project QA Record and accompanying document. VOLATILE ORGANICS DATA VALIDATION SUMMARY FOR DATA PACKAGE: R5185-222-093 (943-1610.003, Filename R5185-V.003) ✓

CLOSURE CERTIFICATION FOR
THE 300 AREA SOLVENT EVAPORATOR
Hanford Site
U.S. Department of Energy, Richland Operations Office

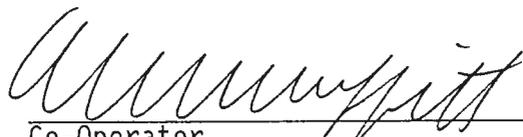
We, the undersigned, hereby certify that, to the best of our information and belief, all closure activities were performed in accordance with the specifications in the closure plan as approved and modified by the State of Washington Department of Ecology, with the exception noted below.

The exception is that the compound ethyl acetate was not a target analyte in the analysis of the collected soil samples. The reason for this exception is presented in the soil sampling report. The report states that, with the method used, ethyl acetate would be expected to be reported as a tentatively identified compound (TIC). All TICs were examined and it was concluded that ethyl acetate was not present at levels of concern for this closure.



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

5/25/95
Date



Co-Operator
A. LaMar Trego, President
Westinghouse Hanford Company

5/4/95
Date