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DEPARTMENT OF ECOLOGY

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February 27, 1992

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F.A. RUCK III

MAY 19 1993

Ms. Annabelle Rodriguez
304 Concretion Unit Manager
U.S. Department of Energy
P.O. Box 550
Richland, WA 99352

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Re: Notice of Deficiency for the 304 Concretion Facility Notice of Deficiency Response Table Dated October 17th, 1991.

Dear Ms. Rodriguez:

This letter transmits Ecology's Notice of Deficiency (NOD) for the 304 Concretion Facility Closure Plan Revision 1 and accompanying NOD Response Table dated October 17, 1991. The majority of the outstanding issues for the 304 Concretion unit concern the closure performance standards. These standards were recently issued in the Nuclear and Mixed Waste Management Program Soil Clean-up Remediation Policy (SCP). 17683

The Notice of Deficiency comments are intended to be a guide to the major outstanding sections of the closure plan which are currently unresolved, and which will be impacted by the SCP. In addition, there are some interpretive comments regarding application of the SCP to the 304 Concretion unit. It is anticipated that upcoming Unit Manager meetings will be concerned with the specifics on how Ecology and Westinghouse Hanford Company foresee applying the SCP to this unit. These specifics will then be incorporated into the closure plan. The Soil Clean-up Remediation Policy is included with this transmittal.

If you have any questions, please contact me at (206) 493-9425.

Sincerely,

Scott E. McKinney
304 Concretion Unit Manager
Nuclear and Mixed Waste Management Program

SM:jw
Enclosure

cc: Dan Duncan, EPA
Fred Ruck, WHC
T.B. Veneziano, WHC/AR
Dave Jansen, Ecology
Dave Nylander, Ecology



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DEPARTMENT OF ECOLOGY
 NOTICE OF DEFICIENCY FOR
 THE 304 CONCRETION FACILITY CLOSURE PLAN
 NOTICE OF DEFICIENCY RESPONSE TABLE
 DATED OCTOBER 17, 1991
 February 28, 1992

The numbers used below reflect the numbers used in the Notice of Deficiency (NOD) Response Table dated October 17th, 1991.

Proposals made in the following comments are accepted by Ecology (underlined numbers indicate new items since the last NOD cycle):

2	3	5	<u>6</u>	7	8	9	10	11	12	<u>13</u>	14
15	19	22	26	28	29	<u>30</u>	31	33	34	36	39
<u>40</u>	41	42	43	44	45	46	47	48	49	51	52
53	55	56	<u>57</u>	58	59	61	63	64	67		

Proposals made in the following comments are not accepted by Ecology:

1. This requirement will be satisfied if all the other elements of the closure plan have been approved.
4. See the N&MWP Soil Cleanup Policy (SCP), attached to this NOD. In particular, options 2 and 3 are the only options under which any contaminants may remain in the soil above natural background levels. This closure plan will need to state which option this unit is intended to be closed under, and the levels to which the soil will be remediated. Please note that taking no action to remediate the soil, unless current soil contaminant levels are below the option 1 or 2 levels, will require full post-closure activities, including but not limited to ground water monitoring, capping, access restrictions, etc. This closure plan may contain the option of sampling the soil to determine contaminant levels prior to choosing the course of action, but the plan must include the full details of all possible options (i.e., post-closure requirements).
16. The language in this section will need to be modified to reflect the closure option selected from the SCP. In particular the actions to be taken in the event clean closure is not achievable must be included with this section, including the postclosure plan.
17. Again, the language in this section will need to be modified to reflect the closure options available for the 304 Concretion unit. In particular the postclosure elements of option 2 and/or 3 must be included in the plan.
18. This section must be revised to reference the SCP regarding closure standards for soils. Also, it will not be possible to leave soil contaminants for later remediation under the operable unit. See comment number 4.

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28. The language in this section regarding soil remediation must be changed. Specifically, soils which do not meet performance standards will not be left for remediation under CERCLA. Also, interim stabilization referenced here must be explained in greater detail in Chapter 8.0, in order for option 2 of the SCP to be utilized.
32. This section must be re-evaluated in light of the SCP. Sampling plans for the various scenarios possible at the 304 Concretion unit must be explained fully. For example, it will be necessary to characterize the soil beneath the 304 Concretion unit and to compare the values for the soil with the SCP. Once the soil has been characterized it can be determined what closure option is most appropriate.
35. The primary impact to this section by the SCP will be the expansion of the soil analyte parameters to include full characterization of the soils underlying the 304 Concretion unit. See comment number 4. In regard to the constituents to be analyzed, all of the analytes included in the SW-846 test methods selected for use in this sampling plan should be included in the data report. In other words, for SW-846 method 6010, all of the elements listed in Table 1 of that section should be included in the analyses. These expanded analyte parameters will add to the information available for evaluating the potential contamination at the 304 Concretion unit due to unknown chemicals stored here in the past.
37. The information contained in DOE-RL/WHG response number 1 concerning the EPA wipe sampling procedure "A compendium of Superfund Field Methods, EPA P-87-001", has not been added to this section. If it has been added to this section, or another section of this plan, it can be pointed out at the next Unit Managers meeting, and this issue will be closed. However, if it has not been added, it must be included before this issue can be closed.
38. See comment number 35.
44. See comment numbers 20 and 21.
50. As discussed at the December 19th, 1991 Unit Managers meeting, it may be acceptable to defer submittal of the Health and Safety Plan until just prior to sampling at the site. This is contingent upon the submittal of an example Hazardous Waste Operation Permit to Ecology. The exact details of the timing of HASP submittal and the sampling plan/closure plan approval will be discussed at future Unit Managers meetings.
54. See response number 50.
60. The SCP will impact this section. Namely, it is not acceptable to leave contaminated soils that exceed the SCP performance standards in place for remediation under the CERCLA process.

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62. There are portions of these documents, particularly E.I.I. 4.2, that are not acceptable practices. For example, it is not acceptable at this facility to delay the marking of the accumulation data for suspected hazardous waste until after the waste has been verified as dangerous waste or it meets the requirements of section 6.4 of E.I.I. 4.2. In general, these documents are open-ended and vague, and do not consistently comply with WAC 173-303. It may be more efficient to write specific requirements for decontamination and interim storage of suspected dangerous waste than to try to change the E.I.I.'s.
65. The legal description of the facility has not been added to the post-closure section. Page 8-1, line 25.
66. All the possible options for closure of the 304 Concretion unit must be explained in detail within the closure plan. This includes the postclosure plan if one of the options for this unit is to leave dangerous waste and/or constituents in place. In the past DOE-RL/WHC have stated that their intention is to leave dangerous waste in place in the soil. If this is the closure approach for this facility, then it is necessary to submit a postclosure plan along with a permit application. WAC 173-303-610 calls for the postclosure plan to be submitted with the permit application within 90 days following the decision by the owner or operator or the department that the unit must be closed as a landfill (i.e., dangerous waste will be left in place upon closure).
68. The wording following the dash in the Table B-1 title should be deleted. The new title will read: "The 304 Wall Sampling Locations." Please note that Table B-1 on page B-2 also needs to be corrected. Correct the other table titles in B-2 as necessary.

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CORRESPONDENCE DISTRIBUTION COVERSHEET

Author: S. E. McKinney, Ecology Addressee: A. Rodriguez, RL Correspondence No.: Incoming 9302946

Subject: NOTICE OF DEFICIENCY FOR THE 304 CONCRETION FACILITY NOTICE OF DEFICIENCY RESPONSE TABLE DATED OCTOBER 17TH, 1991.

TS-3-2

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