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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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June 28, 2011

11-NWP-062

Matthew S. McCormick, Manager
U.S. Department of Energy
Richland Operations Office
P.O. Box 550, A5-11
Richland, WA 99352

Re: Rescind the Class 1 and Class '1 Modifications to the 331-C Storage Unit Hanford Facility
Resource Conservation and Recovery Act (RCRA) Permit

Dear Mr. McCormick:

In the Hanford Facility RCRA Permit Modification Notification Form for the quarter ending March 31, 2011, the Department of Ecology (Ecology) approved Class 1 and Class '1 Modifications to the 331-C Storage Unit. These modifications included:

- Revision of the "Unit Description" to state that waste removal from the unit has been completed and that the facility will be demolished at a future date under a 300 Area Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) removal action;
- Deletion of Addenda B, C, D, E, F, G, I, and J associated with unit waste operations since waste will no longer be managed at 331-C;
- Replacement of Addendum H ("Closure Plan") dated June 30, 2009 with Addendum H dated March 31, 2011;
- Replacement of Addendum A ("Part A Form") to change the co-operator of the facility from Pacific Northwest National Laboratory (PNNL) to Washington Closure Hanford (WCH); and,
- Extension of the schedule for completion of closure to occur within 180 days after transfer of the unit to WCH.

In recent weeks, the U.S. Department of Energy, (USDOE) in cooperation with Ecology, has decided to certify the facility as being clean closed under RCRA in the near term rather than wait until the facility is demolished as part of the CERCLA removal action. Under this new approach, the clean closure certification process was initiated in June 2011.

The purpose of this letter is for Ecology to rescind the approval of the Class 1 and Class '1 Modifications for the 331-C Storage Unit for the quarter ending March 31, 2011, except as noted in the paragraph below. The attached Permit Conditions for the 331-C Storage Unit, dated June 28, 2011 reflect these rescissions, as well as the modifications being kept. USDOE shall return to compliance with the Revision 8C Permit Conditions for 331-C Storage Unit by September 30, 2011, unless the unit is clean closed prior to then.

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Mr. Matthew S. McCormick
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The following two Class '1 Modifications for the 331-C Storage Unit are not being rescinded: The modification to the Part A form changing the co-operator of the unit from PNNL to WCH, and the modification revising the schedule for completion of closure to occur no later than 180 days after transfer of the unit from PNNL to WCH. The attached Addendum H, dated June 28, 2011 reflects this revised schedule for completion of closure.

Provided clean closure is completed prior to issuance of Revision 9 of the Hanford RCRA Permit, the 331-C unit will be addressed in the Revision 9 issuance with language noting that the unit was closed in accordance with the closure plan in Revision 8C of the permit.

If there are any questions regarding this process, please contact Rick Bond at 509-372-7885.

Sincerely,

*Ron Skinnarland, Section Manager by
Rick Bond*

Ron Skinnarland
Section Manager
Waste Management Section

FB:jvs

Enclosures: Part III, Operating Unit Group 15 Conditions 331-C Storage Unit
Addendum H Closure Plan 331-C Storage Unit

cc: Dennis Faulk, EPA
Tony McKarns, USDOE-RL
Jennifer Ollero, MSA
Stuart Harris, CTUIR
Gabriel Bohnee, NPT
Russell Jim, YN
Lela Buck, Wanapum
Susan Leckband, HAB
Ken Niles, ODOE
Administrative Record: 331-C Storage Unit RCRA Closure
Environmental Portal, A3-95
USDOE-RL Correspondence Control, A5-10

PART III, OPERATING UNIT GROUP 15 CONDITIONS**331-C Storage Unit**

Unit Description

The 331-C Storage Unit was a dangerous waste container storage unit located within the south portion of the 300 Area. The unit was used for the collection, consolidation, packaging, storage, and preparation for transport and disposal of dangerous waste. The waste stored at the 331-C Storage Unit consisted of listed waste from specific and nonspecific sources, discarded commercial chemical products, characteristic waste, and criteria waste.

The 331-C Storage Unit is divided into a number of separate locations equipped with independent secondary containment to ensure the segregation of incompatible wastes and proper management and removal of any spills or leaks that might occur. A small, laboratory-style fume hood on the south wall in the storage area was used for waste verification, compatibility testing, and small-volume waste work.

On February 8, 2011, PNNL completed removal of waste stored at the 331-C Storage Unit. The majority of the waste stored at the 331-C Storage Unit was transferred offsite for treatment and disposal. The 331-C Storage Unit was transferred to Washington Closure Hanford (WCH) contractor (Co-Operator) in February 2011, to undergo closure. No further waste management activities will be conducted in the facility prior to closure.

List of Addenda Specific to Operating Unit Group 15

- Addendum A Part A Form, dated March 31, 2011
- Addendum B Waste Analysis Plan, dated September 30, 2009
- Addendum C Process Information, dated June 30, 2009
- Addendum D Groundwater Monitoring (Reserved)
- Addendum E Procedures to Prevent Hazards, dated June 30, 2009
- Addendum F Preparedness and Prevention, dated June 30, 2009
- Addendum G Personnel Training, dated March 31, 2009
- Addendum H Closure Plan, dated June 28, 2011
- Addendum I Inspection Requirements, dated June 30, 2009
- Addendum J Contingency Plan, dated March 31, 2010

Definitions

The term "Cell" means a discrete area for storing a given type of waste within its own secondary containment, a basic unit of storage, a narrow confining area.

Acronyms

Reserved

III.15.A COMPLIANCE WITH UNIT-SPECIFIC PERMIT CONDITIONS

III.15.A.1 The Permittees will comply with all conditions in this Chapter and its addenda with respect to dangerous waste management and dangerous waste management units in the 331-C Storage Unit, in addition to requirements in Permit Parts I and II.

- 1 **III.15.B RESERVED**
- 2 **III.15.C RESERVED**
- 3 **III.15.D RECORDKEEPING AND REPORTING**
- 4 III.15.D.1 The Permittees will place the following into the Hanford Facility Operating Record,
5 331-C Storage Unit File required by Permit Condition II.I.2: [WAC 173-303-380]
- 6 **III.15.E RESERVED**
- 7 **III.15.F RESERVED**
- 8 **III.15.G RESERVED**
- 9 **III.15.H RESERVED**
- 10 **III.15.I RESERVED**
- 11 **III.15.J RESERVED**
- 12 **III.15.K CLOSURE**
- 13 III.15.K.1 The Permittees will close the 331-C Storage Unit in accordance with Addendum H,
14 Closure Plan. [WAC 173-303-610(3)(a)]
- 15 III.15.K.2 The Permittees will amend the Closure Plan in accordance with Permit Condition II.J.3
16 and Addendum H. [WAC 173-303-610(3)(b)]
- 17 III.15.K.3 The Permittees will provide Ecology with a Notice of Closure according to Permit
18 Condition II.J.1. [WAC 173-303-610(3)(c)]
- 19 **III.15.L POST CLOSURE**
- 20 Reserved

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H. CLOSURE PLAN

This addendum, in accordance with the requirements of WAC 173-303-806(4)(a)(xiii), is a plan to ensure safe closure of the 331-C Storage Unit. In accordance with WAC 173-303-610, copies of this closure plan and all revisions will be maintained at 331-C Storage Unit until certification of closure completeness has been submitted and accepted by Ecology. A post-closure plan is not required because 331-C Storage Unit is not a land-based unit and all dangerous waste and dangerous waste residues will be removed at the time of closure.

H.1 CLOSURE PLAN/FINANCIAL ASSURANCE FOR CLOSURE

This plan presents the activities required for final closure of the 331-C Storage Unit at its maximum extent of operation. This closure plan is expected to be updated at closure to reflect integration with the River Corridor cleanup project. Partial closure will not be conducted. Closure activities are presented in sufficient detail such that the closure process is understandable and a closure schedule can be developed.

H.1.1 Closure Performance Standard

The following sections identify performance standards for clean closure of the 331-C Storage Unit.

H.1.1.1 Performance Standards for Soil/Environmental Media

Closure of the 331-C Storage Unit will be conducted in a manner that meets the clean closure performance standards of WAC 173-303-610(2)(a). The performance standards will be met by removing all dangerous waste inventories and by removing or decontaminating all structures and soil to clean closure removal or decontamination standards.

Due to the scope of operations of the 331-C Storage Unit and the preventive measures utilized during operations, releases from the unit that result in soil contamination are not expected. Should such releases result in soil contamination during the operating life of the 331-C Storage Unit, remediation of the contaminants of concern to the numeric cleanup levels prescribed by WAC 173-303-610(2)(b)(i) will be addressed in conjunction with operable unit remediation requirements under the 300-FF-2 Record of Decision and associated CERCLA documentation.

H.1.1.2 Structure Removal or Decontamination Standards

The clean closure removal and decontamination standards for structures, equipment, bases, liners, etc. have been established in accordance with WAC 173-303-610(2)(b)(ii).

The clean closure standard for structures is a visually verifiable standard established in accordance with WAC 173-303-610(2)(b)(ii). The standard is the absence of obvious stains or residues that would indicate potential dangerous waste contamination. Surfaces must be free of indications of potential dangerous waste, except for residual waste stains consisting of light shadows, slight streaks, or minor discoloration. The standard will be achieved through decontamination of all indoor and outdoor storage and loading area floor and pad surfaces. The standard will be verified by visual inspections performed and documented as described in Section H.1.2.3.2. Only storage and loading area floor surfaces and some miscellaneous components that will remain after closure are expected to have the potential to have been contaminated by storage operations and these areas will be required to meet this standard.

H.1.2 Closure Activities

This plan identifies the steps necessary to perform final closure of the unit in order to meet the closure performance standards. Closure activities to achieve and verify clean closure of structures and soil (i.e., storage and loading area pads, floors, trenches, and sumps) are as follows.

Remove all dangerous waste inventory

Remove potentially contaminated storage building equipment and components for reuse

- 1 Decontaminate storage building components and storage building and loading area floors, trenches, and
2 sumps
3 Visually inspect the decontaminated surfaces for achievement of the clean closure standard
4 Sample any contaminated soil and compare results to clean closure standards for soil (not currently
5 expected to be necessary)
6 Certify that closure activities were completed in accordance with the approved closure plan.

7 **H.1.2.1 Maximum Extent of Operations**

8 The 331-C Storage Unit is used to store a variety of different research-related waste and is expected to be
9 fully operational until closure (i.e. no partial closures of storage areas are expected). The maximum
10 inventory of waste in storage at any time will be constrained by three factors:

11 The total amount of dangerous waste in storage at 331-C Storage Unit at any time will not exceed the
12 design capacity of 20,000 gallons (it is typically 2,000 to 5,000 gallons during normal operations)

13 The total amount of any particular dangerous waste in storage during any given year will not exceed the
14 amounts given in Addendum A.

15 The total amount of dangerous waste by hazard class in storage at any one time will not exceed Uniform
16 Building Code Class B Hazardous Material Quantity Restrictions (Addendum C, Table C.1).

17 Evidence of spills or leaks will be obtained through (a) review of spill reports and operating log books;
18 (b) visual inspection of unit structures accessible to the environment (e.g., floors) and through inspection
19 of all visible barriers designed to prevent migration to the environment, and (c) sampling, as necessary to
20 characterize waste/debris that is found while performing visual inspection. If this inspection program
21 indicates that contamination is present, the potential for migration of contamination to the environment
22 will be evaluated. If potential migration appears likely, samples will be taken. In addition, if the
23 inspections identify any potential contaminant migration routes (e.g., cracks in sumps), samples will be
24 collected to determine whether migration has occurred. Waste site specific information discovered during
25 facility closure will be updated in WIDS.

26 **H.1.2.2 Removing Dangerous Wastes**

27 Closure activities will be initiated by removal of the dangerous waste inventory present at 331-C Storage
28 Unit at the time of closure. Inventory removal procedures will be identical to the waste handling,
29 packaging, and manifesting activities associated with normal operation of the unit. All dangerous waste
30 present will be placed into proper containers according to waste handling procedures described in
31 Addendum C. To the extent possible, chemicals will be labpacked or bulked into larger containers. If
32 wastes are bulked, containers will be emptied in compliance with WAC 173-303-160 so that they are not
33 dangerous waste. Labpack containers will be packaged in compliance with the requirements of
34 WAC 173-303-161. All containers of dangerous waste will be manifested, and custody transferred to a
35 dangerous waste transporter having a proper dangerous waste identification number. Waste will be
36 transported to a permitted dangerous waste facility for treatment or disposal.

37 **H.1.2.3 Decontaminating Structures, Equipment and Soil**

38 The following sections describe decontamination and inspection activities for structures and
39 miscellaneous building components that will remain after closure.

40 **H.1.2.3.1 Waste Handling Equipment**

41 No equipment will remain after closure that would require decontamination to meet clean closure levels.
42 All portable waste handling equipment used for handling containers (e.g., barrel tongs, forklift truck,
43 shelving, cabinets) will be decontaminated in the same manner as described in Section H.1.2.3.3 below,
44 removed and redeployed to other Hanford or PNNL operations.

1 H.1.2.3.2 Examination of Structure Surfaces

2 After waste inventory removal, but prior to beginning decontamination procedures, the unit surfaces will
3 be inspected to identify any cracks or other openings through which dangerous waste or decontamination
4 fluids might migrate. The inspections will determine which of the materials that will remain after closure
5 already meet the clean closure standard of a "clean debris surface" and which materials require
6 decontamination to meet the standard. *A clean debris surface means the surface, that when viewed*
7 *without magnification, shall be free of all visible contaminated soil and hazardous waste, except that*
8 *residual staining from soil and waste consisting of light shadows, slight streaks, or minor discoloration,*
9 *and soils and waste in cracks, crevices and pits shall be limited to no more than 5% of each square inch*
10 *of surface area. (40 CFR 268.45)*

11 Any cracks or openings in unit surfaces will be documented in the Hanford Facility Operating Record,
12 331-C Storage Unit file and investigated to determine if releases of dangerous waste or dangerous waste
13 constituents have occurred. If the potential exists for releases to have occurred, sampling will be
14 required, in which case this closure plan will be amended to provide for the sampling and analysis process
15 (Section H.1.2.4). If no potential for releases is found, the cracks or openings will be repaired to prevent
16 release of decontamination fluids and decontamination will proceed as described below.

17 H.1.2.3.3 Decontamination of Structures

18 Storage cell floors, sumps, trenches, and outdoor loading areas requiring decontamination will be cleaned
19 using one or more of the removal technologies described in 40 CFR 268.45, as necessary to meet the
20 "clean debris surface" criteria. Cleaning will be conducted so as to minimize the quantity of rinsates
21 generated. Rinsates (if any) will be collected in trenches or sumps, pumped from the sumps into
22 appropriate containers, and the pump triple rinsed. Rinsate collection locations will be cleaned and
23 inspected last. Decontamination will be documented on a decontamination and inspection checklist. All
24 decontamination waste will be designated in accordance with WAC 173-303 and, if hazardous, managed
25 in compliance with WAC 173-303-610(5). Decontamination waste requiring management as dangerous
26 waste will be managed in a 90-day accumulation area established for the purpose and/or transported to a
27 permitted TSD unit for storage pending disposal.

28 Inspection of materials for a "clean debris surface" will be documented on a checklist that will identify
29 the area inspected, whether decontamination/treatment methods were implemented and the standard used
30 to perform the inspection. If contamination above the clean surface debris criteria is found, the affected
31 areas will be cleaned. Any contaminated material generated by this activity will be managed as described
32 above.

33 Following completion of decontamination, another visual inspection will be performed to verify that
34 decontamination is complete. The cleaned surfaces will be visually inspected for achievement of the
35 clean closure standard described in Section H.1.1.2 of no obvious stains or residues indicating potential
36 dangerous waste contamination. The visual inspection will be documented on the checklist used to
37 document the decontamination. When the visual standard is met, the structure will be considered clean.
38 Copies of the completed visual inspection checklist(s) will be placed in the Hanford Facility Operating
39 Record, 331-C Storage Unit file.

40 H.1.2.3.4 Decontamination and Inspection of Miscellaneous Building Components

41 Grating over trenches of the indoor areas and the outdoor loading pads will be cleaned by high-
42 pressure/low-volume steam or water spray, or will be cleaned by hand using rags, brushes, water, and an
43 appropriate cleaner, if necessary. Rinsate and decontamination materials will be collected, designated, and
44 managed accordingly. Decontamination will be documented on a decontamination and inspection
45 checklist. The grating will be inspected for achievement of the clean closure standard and the inspection
46 documented on the checklist used to document the decontamination.

1 **H.1.2.4 Sampling and Analysis to Identify Extent of Decontamination/Removal and to** 2 **Verify Achievement of Closure Standard**

3 No sampling and analysis of environmental samples (soil or other materials) is expected to be required
4 due to the preventive measures in place during the operating life of the 331-C Storage Unit. If
5 environmental media are contaminated during operation of the 331-C Storage Unit, this plan will be
6 revised to identify methods for sampling and analysis of such media. Decontamination of hazardous
7 debris will be conducted in accordance with the procedures given in Section H.1.2.3. The results of this
8 examination will be documented on a decontamination and inspection checklist. Any necessary sampling
9 and analysis will be conducted in accordance with a sampling and analysis plan to be developed
10 according to Ecology's Clean Closure Guidance (Publication 94-111, current version).

11 **H.1.2.5 Other Activities**

12 Within 60 days of completion of the final closure activities described in this plan, a certification of
13 closure will be submitted to Ecology. This certification will indicate that the 331-C Storage Unit has been
14 closed as described in this plan and that the closure performance standard given in Section H.1 has been
15 met. The certification will be submitted by registered mail and will be signed by the Permittees and an
16 independent Professional Engineer registered in the State of Washington as described below.

17 The Permittees will certify with the following document or a document similar to it:

18 *I, (name), an authorized representative of the U.S. Department of Energy-Richland*
19 *Operations Office located at the Federal Building, 825 Jadwin Avenue, Richland,*
20 *Washington, hereby state and certify that the 331-C Storage Unit at the 300 Area, to the best*
21 *of my knowledge and belief, has been closed in accordance with the attached approved*
22 *closure plan, and that the closure was completed on (date).*

23 (Signature and date)

24 The Permittees will engage an independent Professional Engineer registered in the State of Washington to
25 inspect closure activities, to verify that closure activities are being conducted according to this plan, and
26 to certify that closure has been performed in accordance with this plan.

27 The engineer will inspect the 331-C Storage Unit at least weekly while closure activities are being
28 performed. During these inspections the engineer will observe closure activities to determine whether
29 they are being performed according to this plan. Inspections will include, but not be limited to:

30 Inspection of dangerous waste containment structures and systems to determine whether releases of waste
31 to the environment have occurred

32 Verification that the dangerous waste inventory has been removed within 90 days of receipt of the last
33 waste shipment

34 Inspection of manifests and Hanford Facility Operating Record, 331-C Storage Unit file to verify that
35 these waste were disposed of in compliance with WAC 173-303

36 Inspection of decontamination operations to verify that they are being performed using the procedures
37 described in this plan

38 Inspections of the Hanford Facility Operating Record, 331-C Storage Unit file to verify that samples of
39 liquid decontamination waste were collected and analyzed using the procedures described in this
40 plan

41 Inspection of the Hanford Facility Operating Record, 331-C Storage Unit file to verify that
42 decontamination waste were properly managed in accordance with the requirements of
43 WAC 173-303-610(5).

44 Inspections by the engineer will be documented in a bound notebook. Notations will include the date and
45 time of the inspection, the areas inspected, the activities inspected, applicable closure plan requirements
46 inspected, status of observed activities with respect to plan requirements, corrective actions required

1 status of past corrective actions, and name and signature of inspector. This inspection notebook will be
2 made available to Ecology upon request.

3 Upon completion of closure according to the plan, the Permittees will require the engineer to sign the
4 following document or a document similar to it:

5 *I, (name), a registered Professional Engineer, hereby certify, to the best of my knowledge*
6 *and belief, that I have made visual inspection(s) of the 331-C Storage Unit at the 300 Area*
7 *and that closure of the aforementioned unit has been performed in accordance with the*
8 *attached approved closure plan.*

9 (Signature, date, state Professional Engineer license number, business address, and phone number.)

10 No other activities are expected to be necessary for clean closure.

11 **H.1.3 Maximum Waste Inventory**

12 The maximum waste inventory for the 331-C Storage Unit will not exceed 20,000 gallons, as described in
13 Addendum A. The inventory will consist of the waste types described in Addendum A.

14 **H.1.4 Closure of Waste Piles, Surface Impoundments, Incinerators, Land Treatment** 15 **Facilities, and Miscellaneous Units**

16 This section is not applicable to the 331-C Storage Unit because wastes are not managed in these types of
17 units.

18 **H.1.5 Closure of Landfill Units**

19 This section is not applicable to the 331-C Storage Unit because it does not contain any landfill units and
20 will not be closed as a dangerous waste landfill unit.

21 **H.1.6 Schedule for Closure**

22 When closure begins, the inventory of dangerous waste will be removed within 90 days from receipt of
23 the final volume of waste. All closure activities will be completed within 180 days of transfer of the
24 facility to Washington Closure Hanford. Ecology will be notified by DOE-RL at least 45 days before the
25 final closure activities are begun. Closure activities are summarized in Table H.1. A detailed schedule of
26 closure activities is provided in Table H.2.

27 **H.1.7 Extension for Closure Time**

28 The inventory of dangerous waste will be removed from the 331-C Storage Unit within 90 days of receipt
29 of the last volume of waste. The closure activities described in this plan will be completed within
30 180 days of transfer of the facility to Washington Closure Hanford. No extension to the time frame for
31 initiation and completion of closure is currently expected to be necessary. Extensions to the time frames
32 for closure would only be necessary if unexpected conditions were encountered during closure of the unit.
33 If it becomes apparent that all waste cannot be removed within 90 days, Ecology will be so notified at
34 least 30 days prior to expiration of the 90-day period. This notification will demonstrate why more than
35 90 days is required for removal of the waste and will demonstrate that steps have been taken to prevent
36 threats to human health and the environment and that the unit is in compliance with applicable permit
37 standards. If it becomes apparent that closure cannot be completed within 180 days after approval of this
38 plan, Ecology will be so notified at least 30 days prior to expiration of the 180-day period. This
39 notification will demonstrate why more than 180 days is required for closure and will demonstrate that
40 steps have been taken to prevent threats to human health and the environment and that the unit is in
41 compliance with applicable permit standards.

42 **H.1.8 Closure Cost Estimate**

43 The Hanford Facility is not required to comply with the financial assurance requirements in
44 WAC 173-303-620 based upon Permit Condition II.J.

1 H.1.9 Financial Assurance Mechanism for Closure

2 The Hanford Facility is not required to comply with the financial assurance requirements in
3 WAC 173-303-620.

4 H.2 NOTICE IN DEED

5 This section is not applicable because the 331-C Storage Unit is not expected to be closed as a dangerous
6 waste disposal unit.

7 H.3 POSTCLOSURE PLAN

8 This section and subsequent subsections are not applicable because the 331-C Storage Unit is expected to
9 be clean closed, not as a land-based unit.

10 H.4 LIABILITY REQUIREMENTS

11 The Hanford Facility is not required to comply with the financial assurance requirements in
12 WAC 173-303-620.

13 Table H.1. Summary of Closure Activities

Closure Activity Description	Expected Duration
Receipt of final volume of dangerous waste	N/A
Notify EPA and Ecology that closure will begin	30 days
Remove waste inventory – package all dangerous waste, manifest, and transfer to permitted facility for further storage, treatment and/or disposal	45 days
Decontaminate structural surfaces and equipment.	55 days
Analyze decontamination waste to determine proper methods of treatment/disposal	25 days
Dispose of decontamination waste based on results of waste analysis	20 days

14 Table H.2. Detailed Schedule of Closure

Action	Schedule
Pre-Closure Activities	
Date of receipt of last volume of waste	10/29/10
Notify EPA and Ecology	12/15/10
Closure Activities	
Removal of Waste Inventory	1/26/11
Removal of equipment and components	1/28/11
Decontamination of Unit	1/28/11
Transfer of Unit to Washington Closure for Completion of Closure Activities	2/28/11
Management of Decontamination Waste (if generated)	
Waste Analysis	7/15/11
Waste Disposal	7/30/11
Other Activities	
Certification of Closure to Ecology	8/31/11

15