



0062897



October 7, 2004

Mr. John Morse
U.S. Department of Energy
PO Box 550
Richland, WA 99352

Mr. Briant Charboneau
U.S. Department of Energy
PO Box 550
Richland, WA 99352

Ms. Arlene Tortoso
U.S. Department of Energy
PO Box 550
Richland, WA 99352

RECEIVED
OCT 19 2004
EDMC

Dear Mr. Morse, Mr. Charboneau, and Ms. Tortoso:

SUBJECT: Disposal of Pre-1980 Submersible Pumps Potentially Containing Polychlorinated Biphenyls (PCBs) Regulated under the Toxic Substance Control Act (TSCA)

The Washington State Department of Ecology (Ecology) and the U.S. Environmental Protection Agency (EPA) have reviewed information provided by the U.S. Department of Energy (DOE) regarding the usage and disposal of submersible pumps manufactured prior to 1980.

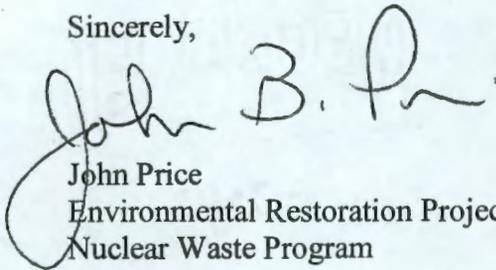
Ecology and EPA agree that the following approach is acceptable for the management and disposal of the submersible pumps:

- The submersible pumps scheduled for disposal will be managed as debris in accordance with Chapter 40 Code of Federal Regulations (CFR) Part 268.45, Treatment Standards for Hazardous Debris.
- The submersible pumps will be treated to a clean debris surface using chemical extraction (water washing) to remove hazardous contaminants from the pumps. Water washing consisting of running at least three pump volumes of clean water through the pumps at the well head will be considered a satisfactory application of a chemical extraction technology pursuant to 40 CFR 268.45. Any wash water will be contained and managed as a treatment residue at an appropriate waste management facility pursuant to 40 CFR 268.45(d).

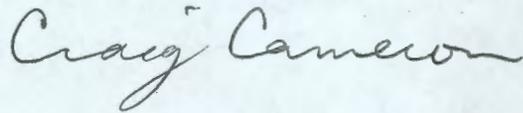
- In accordance with 40 CFR 268.45(c), these submersible pumps, after being treated using chemical extraction, will not be a hazardous waste¹.
- Since the motor and capacitor portion of the submersible pumps may contain regulated PCBs, they will be stored in a 90 day accumulations area that meets the TSCA storage for disposal facility requirements of 40 CFR 761.61(b).
- The motor and capacitor portion of the submersible pumps will be stored no longer than 179 days prior to shipment for PCB testing and disposal. The TSCA 'removed from service date' will correspond to the date the pumps are shipped.

If you have any additional questions, please contact John Price at (509) 372-7921, or Craig Cameron at (509) 376-8665.

Sincerely,



John Price
Environmental Restoration Project Manager
Nuclear Waste Program



Craig Cameron
Project Manager
U.S. Environmental Protection Agency

cc: Joel Hebdon, DOE
John Winterhalder, FH
Brenda Becker-Khaleel, Ecology
Dave Bartus, EPA
Admin. Record: 200-UP-1, 200-ZP-1, 200-BP-4, 200-PO-1

¹ Pumps that have not been discarded and are not being speculatively accumulated are not solid wastes. Ecology has determined, however, that hazardous waste remaining in pumps being stored for reuse may pose a risk of release or exposure. Such pumps and other equipment must be stored according to the contaminated equipment policy to ensure these risks are appropriately addressed.