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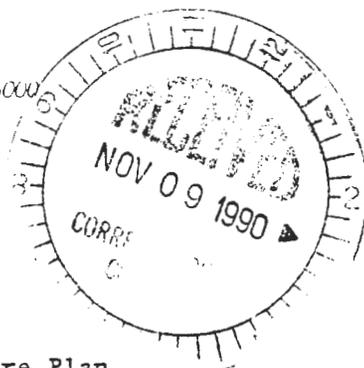
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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Mail Stop PV-11 • Olympia, Washington 98504-8711 • (206) 454-6000

November 2, 1990



Mr. Steven H. Wisness
U. S. Department of Energy
P. O. Box 550
Richland, Washington 99352

Re: Nonradioactive Dangerous Waste Landfill Closure Plan

Dear Mr. Wisness:

We have evaluated the Nonradioactive Dangerous Waste Landfill (NRDWL) closure plan and would like to investigate the possibility of an alternative approach of closing this unit. This alternative calls for the removal of all waste material from the landfill. We are interested in this alternative because of the successful trench excavation and waste removal done by the Department of Energy in November 1985.

Your current closure plan calls for closing the unit as a landfill. This approach will require expensive capping, cover design and placement, and post-closure monitoring. Since the current approach has waste remaining in place, there exists a potential that system failure could occur in the future resulting in the need for long-term vadose and ground water remediation. These costs could be avoided if an alternative landfill closure scenario is feasible from a technical standpoint.

The "clean closure" approach is consistent with our clean-up efforts. It also may prove to be more environmentally sound than the disposal option and more cost effective in the long term.

I would like staff to discuss this alternative in the next unit manager's meeting, and that the information listed in enclosure 1 be provided to us within sixty (60) days.

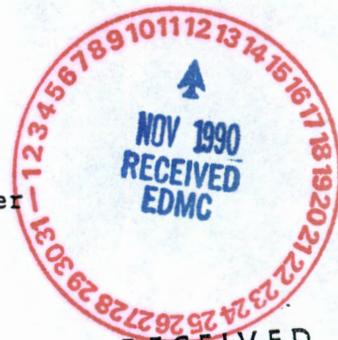
Mr. Paul Stasch of my staff is the lead on this project and he can be reached at (206) 459-6725. Thank you for your consideration of this matter.

Sincerely,

Timothy L. Nord
Hanford Project Manager

Enclosure

cc: Dan Duncan, EPA
Toby Michelena
Paul Stasch



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DOE-RL/CCC
190-PPB-327

Enclosure 1

- o All photographs of waste removal or placement operations from 1975 to the present, if available.
- o All manifests documenting waste shipments to the NRDWL, both regulated and unregulated. These manifests must match the waste inventory (below).
- o All analytical results, both characterization and designation, pertaining to wastes disposed of in the NRDWL.
- o Physical and chemical descriptions and all analytical results pertaining to wastes removed from Trench 19N and redeposited in the "trash trench central landfill."
- o The types and amounts of all noncontainerized waste disposed of in the NRDWL.
- o A radiological and chemical characterization of any other mixed waste other than the carbon-14 material which had been disposed of in the NRDWL.
- o Methodologies and documentation of the waste excavation operation conducted during November 1985.
- o Documentation of any soil staining or leakage during excavation of Trench 19N and, if available, analytical information from sampling.
- o Documentation of any leaking containers found during excavation (there number and condition).
- o A discussion of the differences which exist in the waste inventories included in the 1985 and 1990 closure plans. This must include a new, spelling corrected waste inventory.
- o The number of containers, container sizes, container material and container location within each trench for all containerized wastes disposed of in the NRDWL.
- o Stacking arrangements of the containers within each trench.
- o Number, description, volume and exact location within each trench of all reactive waste disposed of in NRDWL.
- o Costs of the November 1985 excavation.

DISTRIBUTION COVERSHEET

Author

TL Nord/WDOE

Addressee

SH Wisness/DOE-RL

Correspondence No.

Incoming: 9005000

Subject Nonradioactive Dangerous Waste Landfill Closure Plan

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