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STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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March 4, 1992

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



Re: Classification of the 216-U-14 Ditch

Dear Mr. Wisness:

In reviewing the 200-UP-2 Operable Unit Work Plan and the U-Plant Aggregate Area Management Study Report, it has come to our attention that the 216-U-14 Ditch has been erroneously classified in the Hanford Federal Facility Agreement and Consent Order, Appendix C, as a CERCLA Past Practice Unit. Ecology believes this facility should be reclassified as a disposal unit under RCRA. This determination is also substantiated by: the Liquid Effluent Consent Order which includes, under Project W-049H, "Cease discharge of the 242-S Evaporator Steam Condensate to the 216-U-14 Ditch by June 1995"; and by the most recent edition of the Hanford Site Waste Management Units Report (USDOE-RL 88-30 Rev. 2). See attached "216-U-14 Ditch Fact Sheet" for additional data.

USDOE-RL has recently proposed this unit be investigated and remediated within the 200-UP-1 Operable Unit. This operable unit is in a Category "C" listing, and therefore is not scheduled for investigation for many years. Data presented in the work plan and aggregate area report confirm this facility has extensive contamination. These data indicate it is prudent to close this unit as soon as possible. In consideration of this information, we concur that, "Evaluation and deactivation of these facilities (including 216-U-14) will remain with the ongoing (Waste Management) program and will not be included as part of the past practices investigation" (U-Plant AAMS, pg. 9-9).

It is Ecology's recommendation that coordination occur for timely submittal of a closure plan and remediation for the 216-U-14 Ditch with adjacent facilities covered under RCRA. We recommend discussions begin at the earliest possible date to begin this coordination.

Discharge to the 216-U-14 Ditch is scheduled to cease by June 1995. Further, the 216-U-12 crib, which received waste from the same source (U-Plant) will have a closure plan submitted in November, 1994. Ecology believes it is technically appropriate and cost effective to submit closure plans for these two units at the same time. This should allow for more efficient preparation of the documents as well as more efficient review.

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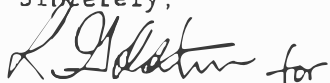
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Submittal of the 216-U-14 Ditch closure plan in November 1994 will also coincide with the cease discharge requirements of the M-17-00 Milestones which have recently been negotiated. Submittal of these documents will ensure the appropriate coordination between the dangerous waste closure requirements and the requirements for liquid effluents in M-17-00 and the Liquid Effluent Consent Order.

Reclassification of this unit constitutes a Class II Change under the TPA. We will submit the appropriate forms for your consideration in the near future. Please contact Mr. Larry Goldstein at (206) 438-7018 should you have questions concerning this determination. For questions concerning the closure plan, please contact Mr. Toby Michelena at (206) 438-7016.

Sincerely,



David B. Jansen, P.E.  
Hanford Project Manager  
Nuclear and Mixed Waste Management

Attachment

cc: Paul Day, EPA  
T. Veneziano, WHC

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# CORRESPONDENCE DISTRIBUTION COVERSHEET

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Subject: CLASSIFICATION OF THE 216-U-14 DITCH

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