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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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November 7, 1997

Mr. James E. Rasmussen, Director
Environmental Assurance, Permits, and Policy Division
U.S. Department of Energy
Richland Operations Office
P. O. Box 550, MSIN: A5-15
Richland, WA 99352

Mr. William D. Adair, Director
Environmental Protection Responsible Party
Fluor Daniel Hanford, Inc.
P.O. Box 1000, MSIN: H6-21
Richland, WA 99352



Dear Messrs. Rasmussen and Adair:

Re: Closure Certification for the 3718-F Alkali Metal Treatment and Storage Facility (AMTSF)

The Washington State Department of Ecology (Ecology) rejects the closure certification submitted in a letter dated September 24, 1997, from James E. Rasmussen, U.S. Department of Energy (USDOE), and William D. Adair, Fluor Daniel Hanford, (FDH), to Moses Jaraysi, (Ecology), regarding Closure Certification for the 3718-F Alkali Metal Treatment and Storage Facility for the 3718-F Alkali Metal Treatment and Storage Facility (AMTSF), Resource Conservation and Recovery Act (RCRA) treatment, storage, and/or disposal (TSD) unit. The certification fails to comply with the conditions of the Closure Plan due to the presence of polychlorinated biphenyl (PCB) contamination above Model Toxics Control Act (MTCA) method B level. In accordance with Chapter 13 of the Hanford Federal Facility Wide RCRA Permit, Revision 3A, the following conditions have been violated. The analytical results of the sampling event will be used to determine if corrective action will be required to close the 3718-F AMTSF (V.13.B.b). Ecology will consider removal and decontamination complete when the concentrations of dangerous waste, dangerous waste constituents, and dangerous waste residues originating from the 3718-F, (throughout the areas affected by releases from this unit) do not exceed numeric cleanup levels for soils, groundwater, surface water, and air using residential exposure assumptions according to the MTCA 173-340, method A or B (V.13.B.I). The 3718-F AMTSF can not be released from interim status until it can be demonstrated that the unit has been closed in accordance with closure requirements of WAC 173-303, or corrective action has been completed (V.13.A). A Post-Closure permit will be required if dangerous wastes constituents, residues, or decomposition products are left in place at concentrations above the

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numeric cleanup levels determined using the residential exposure assumptions according to the MTCA 173-303, method A or B (V.13.B.m).

The certification and associated correspondence omits information impacting the RCRA closure of this unit, specifically the mitigation of the PCB contamination at the 3718-F AMTSF TSD unit. Due to the waste management practices employed at the unit, Ecology suspected the presence of PCB contamination. However, USDOE refused to address Ecology's request to analyze samples for potential PCB contamination at the unit. In order to expedite the closure process and keep management costs to a minimum, Ecology analyzed split samples taken during closure activities for PCB's. All Ecology samples contained PCB's. However, only one sample taken from the bottom of a sump, which has no future use and could be removed at a minimal cost, contained PCB contamination elevated above MTCA method B levels. Ecology PCB analytical data has been confirmed by USDOE, who had the original closure samples analyzed for PCB's following notification of Ecology's analytical results.

The subject letter fails to mention a meeting which occurred August 20, 1997, at the Environmental Protection Agency (EPA), Hanford Project Office, in Richland, Washington, between Jeanne Wallace (Ecology-300 Area Project Manager), Dave Einan (EPA-300 Area Project Manager), Ellen Mattlin (USDOE-EAP), Jack Sonnichsen (Waste Management Federal Services), Stephanie Johansen (general support services contractor) and Tom Dillhof (Babcock & Wilcox Hanford). Dave Einan participated in his capacity as the EPA, 300 Area Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) Operable Unit Manager. At the meeting, Dave Einan and I stated that removal of the sump and the affected soils followed by verification sampling, beneath and around the sump, would be required before the closure of this TSD unit would be considered complete. USDOE and/or contractors stated there was fear of setting the precedence of remediating PCB contamination at RCRA TSD's on the Hanford Site, particularly those which did not contain PCB's on the unit specific interim status permits (Part A, Form 3). Since that meeting, Ecology has determined the precedence has already been established. The 100 D Ponds RCRA TSD unit is addressing the remediation of soil contaminated with PCB's despite the absence of the constituent from the interim status permit (note, it is not the intent of the Part A to limit constituents addressed during closure of a RCRA TSD unit).

Ecology will allow 45 days to correct this non-compliance situation. In order for clean closure of this unit to occur, actions must occur to remove the contaminated sump structure and perform confirmation sampling to verify the concentration of PCB contamination is below 10 parts per million (ppm), the MTCA method B level. As stated in the August 20, 1997 meeting, if a PCB plume is identified, Ecology and EPA will work to appropriately streamline regulatory management of extensive contamination. Please submit to Ecology a removal, verification, and mitigation strategy to be completed within 45 days of receipt of this notice. Ecology will review and respond to the adequacy of the strategy within five working days of receipt. After completion of the approved removal, verification, and mitigation strategy, a revised closure certification should be submitted reflecting the additional activities conducted. However, if USDOE and FDH fail to remove the contaminated structures and characterize the PCB contamination within 45 days Ecology will issue a notice of violation for failure to comply with permit conditions of the 3718-F AMSTF Closure Plan.

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Please ensure future correspondence to Ecology for the 300 Area is sent, or at a minimum copied, to me. This procedure is intended to expedite response to correspondence and streamline information management. In accordance with Chapter 4.0 of the Hanford Federal Facility Agreement and Consent Order, Ecology distributed to USDOE and EPA in a February 26, 1996, letter from Mike Wilson (Ecology) to Linda McClain (USDOE) and Doug Sherwood (EPA) a listing of Ecology project managers. This letter has also been distributed several times at monthly 300 Area Project Manager meetings. Each project manager represents his/her respective party and keeps his/her agency informed on the status and any problems which arise. The closure certification for the 3718-F AMTS was inappropriately submitted. The closure certification was submitted to Moses Jaraysi (Ecology) only, with no copies for distribution to the Ecology or EPA 300 Area Project Managers.

I would appreciate your attention to the completion of the removal action so Ecology may, in the future, accept a closure certification for 3718-F AMTSF TSD unit. If you have any questions regarding the RCRA certification, please contact me at (509) 736-3019.

Sincerely,



Jeanne Wallace
300 Area Project Manager
Nuclear Waste Program

JW:skr

cc: Mike Wilson, Ecology
Doug Sherwood, EPA
Dave Einan, EPA
Tom Dillhoff, BWI
Jack Sonnichsen, WMFS
Russell Jim, YIN
Donna Powaukee, NPT
Fred Ruck, FDH
Cliff Clark, USDOE
Ellen Mattlin, USDOE
J. Wilkinson, CTUIR
John Wagoner, USDOE
Hank Hatch, FDH
Mary Lou Blazek, ODOE
Administrative Records: 3718-F AMSTF

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