

# Close Out Form Environmental Compliance Issues Identified in the DOE/RL Letter 95-PCA-342

Prepared for the U.S. Department of Energy  
Assistant Secretary for Environmental Management

Contractor for the U.S. Department of Energy  
under Contract DE-AC06-08RL14788

**CH2MHILL**  
Plateau Remediation Company

**P.O. Box 1600  
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**CH2MHILL**  
Plateau Remediation Company  
P.O. Box 1600  
Richland, Washington 99352

**APPROVED**  
*By Sarah Harrison at 7:59 am, Dec 30, 2019*

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Release Approval

Date

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# CORRESPONDENCE COVER SHEET

MI 056234

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## CLOSE OUT FORM ENVIRONMENTAL COMPLIANCE ISSUES IDENTIFIED IN DOE/RL LETTER 95-PCA-342 DATED 07/06/95

From	Org	To	Org	cc	Closes
LONDON, RJ	BHI	FILE	BHI		LTR 056233    NA

Area	Subject	OU	TSD	ERA
100D	6620	100-DR-1	D-1-1	
100N	8310	100-NR-1	D-2-10	
200E		100N PILOT	D-2-2	
200W		200-PO-1	D-2-3	
		200-PO-5	D-2-4	
		200-SO-1	D-2-5	
			D-2-7	
			S-2-9	
			T-1-2	
			TS-2-2	

### ACTION TRACKING

Owed To	Org	Due	Owed By	Org	Forecast
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### DISTRIBUTION

ERC Master File	<input type="checkbox"/>	DOE Project File	<input type="checkbox"/>	NON-Project File	<input type="checkbox"/>	HR File	<input type="checkbox"/>
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**BHI**

LONDON, RJ                      H0-02

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## CLOSE OUT FORM

**ENVIRONMENTAL COMPLIANCE ISSUES  
IDENTIFIED IN DOE/RL LETTER 95-PCA-342  
DATED JULY 6, 1995**

Tracking Number: 34Date: March 31, 1997

**Compliance Issue Description:** Improperly capped out-of-service monitoring wells. Some Hanford Site monitoring wells (as many as approximately 1,100) may not be properly capped in the manner set forth in WAC-173-160. This issue was identified in the Dan Silver letter of July 6, 1995 ("Identification of Non-Permitted Treatment, Storage, or Disposal [TSD] Facilities and Related Potential Environmental Non-Compliant Conditions at the Hanford Site").

**Basis for Close Out:**

Out-year funding has been identified (FY 1997 @ \$1,700,000) and requested (FY 1998 @ \$3,800,000) to continue the existing monitoring well maintenance and decommissioning program. One part of the maintenance operations will address improperly capped monitoring wells (when located during the course of routine well maintenance and decommissioning operations). Average cost to install a locking well cap is approximately \$100 per well. This task is a normal part of the well maintenance program.

**Resolution:**

This close out refers to the removal of the issue from the Silver List, and not to the ultimate compliance resolution of this issue. This issue will be included in the Hanford Action Tracking System (HATS) database reflecting that non-compliant monitoring well conditions exist. The U.S. Department of Energy will continue to address this issue jointly with Ecology, with closure resulting once all existing out-of-service monitoring wells have been inspected and appropriately capped in accordance with WAC-173-160-085. At that time, the issue will be removed from the HATS database.

This represents the agreement by the specified Agencies to the resolution described above for this compliance issue. The persons signing below represent that they are authorized to agree on behalf of their respective Agencies to this resolution.

Ecology Stan TejaDate 3/31/97DOE Program M. J. FurmanDate 3/31/97DOE EAF E. G. R. MerionDate 3/31/97

**CLOSE OUT FORM**

**ENVIRONMENTAL COMPLIANCE ISSUES  
IDENTIFIED IN DOE/RL LETTER 95-PCA-342  
DATED JULY 6, 1995**

**Tracking Number:** 7.1

**Date:** 04/04/96

**Compliance Issue Description:**

N REACTOR - Nonpermitted Potential TSD Facilities - Sludge accumulated at the Emergency Dump Basin prior to 1987 may contain dangerous waste constituents. Sludge at the N Area Fuel Storage Basin may contain dangerous waste.

**Basis for Close Out:**

- 1) Sampling conducted at the Emergency Dump Basin in January 1996. Based on the sample results, it was determined that the sediment in the Basin does not designate as a dangerous waste.
- 2) 100-N Area deactivation of the Fuel Storage Basin is proceeding consistent with a compliance order (the TPA) as a part of the TPA Refocusing Package signed in May 1995 and milestone M-16-01E.

**Resolution:**

Sediment accumulations in the N Area Emergency Dump Basin do not designate as dangerous waste and the Fuel Storage Basin is already under the Tri-Party Agreement. No further administrative action is required.

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This represents the agreement by the specified Agencies to the resolution described above for this compliance issue. The persons signing below represent that they are authorized to agree on behalf of their respective Agencies to this resolution.

Ecology	<u>Phillip R. Steals</u>	Date	<u>4/4/96</u>
DOE Program	<u>Saul M. Dale</u>	Date	<u>4/4/96</u>
DOE EAP	<u>F. G. R. Phiero</u>	Date	<u>4/9/96</u>

**CLOSE OUT FORM**

**ENVIRONMENTAL COMPLIANCE ISSUES  
IDENTIFIED IN DOE/RL LETTER 95-PCA-342  
DATED JULY 6, 1995**

**Tracking Number:** 16.6.2: 40.16

**Date:** \_\_\_\_\_

**Compliance Issue Description:**

40 CFR 265 Subpart J establishes a variety of requirements pertaining to hazardous waste tank systems, including provision of secondary containment and leak detection systems for the tank and ancillary equipment (e.g., piping), an assessment to verify the integrity of the existing tank system, daily inspections of the tank systems, and provision of spill and overflow prevention systems. The Hexone Tanks do not satisfy these requirements.

In addition, regulatory provisions at WAC 173-303-320 require that a TSD inspection schedule and routine be developed. Inspections must be done in accordance with the inspection schedule and results documented in an inspection log.

**Basis for Close Out:**

The Hexone Tanks are unfit-for-use and will not be upgraded to meet regulatory requirements for active tanks. As such, the tanks are subject to the requirements of 40 CFR 265.196. The following actions have been taken to ensure protection of human health and the environment: (1) use has ceased, (2) waste removal has occurred to a degree that prevents further release to the environment (most of the waste has been removed from the Hexone Tanks, however, a residue heal remains), (3) visible releases are not present, (4) the regulatory authorities have been informed of any known releases associated with the units, and (5) the units are scheduled for closure (pursuant to the TPA), (6) inspections occur and are documented on a weekly basis, and (7) problems identified will be remedied.

With regards to the inspection schedule and requirements of WAC 173-303-320, the Hexone Tanks are currently inspected on a weekly basis to ensure proper operation of the nitrogen cover system. In addition, the Hexone Tank liquid level monitors are currently read and recorded monthly, but will be increased to weekly. Given that the Hexone Tanks have been emptied except for a residue heal, the weekly inspection frequency is considered to be often enough to identify problems in time to correct them before they harm human health or the environment.

**Resolution:**

The Hexone Tanks are considered unfit-for-use and will not be upgraded to meet regulatory requirements for active tanks. To ensure protection of human health and the environment, inspection activities will be conducted weekly and closure activities will be conducted according to an approved Closure Plan. Problems identified during inspections will be remedied. Copies of this form will be kept in the Operating Record, and the inspection log for the facility.

\_\_\_\_\_  
This represents the agreement by the specified Agencies to the resolution described above for this compliance issue. The persons signing below represent that they are authorized to agree on behalf of their respective Agencies to this resolution.

Ecology Alan D. Huckey

Date 9-9-96

DOE Program James Hood

Date 12-6-96

DOE EAP F. C. R. Mirra

Date 1-13-97

**CLOSE OUT FORM**

**ENVIRONMENTAL COMPLIANCE ISSUES  
IDENTIFIED IN DOE/RL LETTER 95-PCA-342  
DATED JULY 6, 1995**

**Tracking Number:** 40.2

**Date:** \_\_\_\_\_

**Compliance Issue Description:**

According to 40 CFR 265.226(a)(2), a dangerous waste surface impoundment (including dikes and vegetation surrounding the dike) must be inspected at least once a week to detect any leaks, deterioration, or failures in the impoundment. Such inspections are not being done at the 100D Ponds.

**Basis for Close Out:**

The 100D Ponds surface impoundments were required to cease receipt of hazardous waste and begin closure. These requirements have been met and the closure time frame has been established by the TPA compliance schedule. Weekly dike inspections are intended to minimize the possibility of dike failure. Such concerns are pertinent to surface impoundments during the operational phase, not during the closure phase after all liquid waste discharges have ceased and no liquid waste remains.

**Resolution:**

A quarterly surveillance frequency (as is currently in place at the 100D Ponds) is adequate in lieu of a weekly inspection given the non-operational status of the units and intent of the regulatory provision.

---

This represents the agreement by the specified Agencies to the resolution described above for this compliance issue. The persons signing below represent that they are authorized to agree on behalf of their respective Agencies to this resolution.

Ecology Keith R. Holliday

Date 4-25-96

DOE Program Nicole S. Kimball

Date 5-31-96

DOE EAP F. G. R. Miera

Date 6/10/96

*This agreement was revised by 4/15/97 letter from  
Keith Holliday, Ecology*



**CLOSE OUT FORM**

**ENVIRONMENTAL COMPLIANCE ISSUES  
IDENTIFIED IN DOE/RL LETTER 95-PCA-342  
DATED JULY 6, 1995**

**Tracking Number:** 40.1

**Date:** \_\_\_\_\_

**Compliance Issue Description:**

40 CFR 265.223 stipulates that "all earthen dikes must have a protective cover, such as grass, shale, or rock, to minimize wind and water erosion and to preserve their structural integrity." The dike separating the 100-D Ponds does not have any specially designed protective cover per se; however, there is no liquid waste discharged into the 100-D Ponds.

**Basis for Close Out:**

The 100-D Ponds were required to cease receipt of hazardous waste and begin closure. These requirements have been met and the closure time frame has been modified pursuant by the TPA compliance schedule. The existing 100-D Ponds dike system is adequate given the status of the units and intent of the regulatory provision.

**Resolution:**

The 100-D Ponds are viewed as compliant with the protective cover requirement since: (1) the units have ceased receipt of hazardous waste and are in the closure mode (with actual initiation of closure activities established pursuant to the TPA), and; (2) given the non-operational status of the 100-D Ponds and the absence of any accumulation of liquid, the existing dike system cover is sufficient to the purpose of preserving the structural integrity of the unit.

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This represents the agreement by the specified Agencies to the resolution described above for this compliance issue. The persons signing below represent that they are authorized to agree on behalf of their respective Agencies to this resolution.

Ecology *Kathy K. Whalley*

Date 5-15-96

DOE Program *Nicole S. Kimball*

Date 5-31-96

DOE EAP *Teri R. Miera*

Date 6/10/96

**CLOSE OUT FORM**

**ENVIRONMENTAL COMPLIANCE ISSUES  
IDENTIFIED IN DOE/RL LETTER 95-PCA-342  
DATED JULY 6, 1995**

**Tracking Number:** 40.6:40.7

**Date:** 4/25/96

**Compliance Issue Description:**

According to 40 CFR 265.226(a)(2), a dangerous waste surface impoundment (including dikes and vegetation surrounding the dike) must be inspected at least once a week to detect any leaks, deterioration, or failures in the impoundment. Such inspections are not being done at the 1324-N and 1324-NA units.

**Basis for Close Out:**

By agreement, the 1324-N/1324-NA units were required to cease receipt of hazardous waste by November 8, 1988, and begin closure. These requirements have been met and the closure time frame has been established by the TPA compliance schedule. Weekly dike inspections at surface impoundments are intended to minimize the possibility of dike failure. Such concerns are pertinent during the operational phase, not during the closure phase after all liquid waste discharges have ceased and no liquid waste remains.

**Resolution:**

A quarterly surveillance frequency (as is currently in place at the 1324-N/1324-NA units) is adequate in lieu of a weekly inspection given the non-operational status of the unit and intent of the regulatory provision.

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This represents the agreement by the specified Agencies to the resolution described above for this compliance issue. The persons signing below represent that they are authorized to agree on behalf of their respective Agencies to this resolution.

Ecology Phillip R. Stach

Date 4/25/96

DOE Program A. De. Olson

Date 6/3/96

DOE EAP Felix R. Michra

Date 6/11/96

**CLOSE OUT FORM**

**ENVIRONMENTAL COMPLIANCE ISSUES  
IDENTIFIED IN DOE/RL LETTER 95-PCA-342  
DATED JULY 6, 1995**

**Tracking Number:** 2.1

**Date:** 11/07/95

**Compliance Issue Description:**

Inadequately Characterized Materials in Storage - Miscellaneous materials are stored and are being evaluated to determine which items are still usable. Remaining materials will be characterized and shipped to the appropriate facility for disposal. Such facilities include:

- Room 226 of Building 2101M

**Basis for Close Out:**

An evaluation of the materials was made, materials have been characterized, removed and shipped to the onsite permitted TSD for disposal. Thus, no materials remain.

**Resolution:**

No further action required.

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This represents the agreement by the specified Agencies to the resolution described above for this compliance issue. The persons signing below represent that they are authorized to agree on behalf of their respective Agencies to this resolution.

Ecology

J. Thomas Peff

Date

4-29-96

DOE Program

Jan. Reul

Date

7/17/96

DOE EAP

F. G. R. Mica

Date

7/26/96

**CLOSE OUT FORM**

**ENVIRONMENTAL COMPLIANCE ISSUES  
IDENTIFIED IN DOE/RL LETTER 95-PCA-342  
DATED JULY 6, 1995**

**Tracking Number:** 16.6.1

**Date:** \_\_\_\_\_

**Compliance Issue Description:**

40 CFR 265 Subpart J establishes a variety of requirements pertaining to hazardous waste tank systems, including provision of secondary containment and leak detection systems for the tank and ancillary equipment (e.g., piping), an assessment to verify the integrity of the existing tank system, daily inspections of the tank systems, and provision of spill and overflow prevention systems. The 241-CX-70, -71, and -72 Tanks do not satisfy these requirements.

**Basis for Close Out:**

Consistent with the requirements of 40 CFR 265.196, actions have been taken commensurate with tanks that are deemed unfit-for-use, i.e. : (1) use has ceased, (2) waste removal has occurred to a degree that prevents further release to the environment, (3) visible releases are not present, (4) the regulatory authorities have been informed of any known releases associated with the units, and (5) the units are scheduled for closure (pursuant to the TPA) in lieu of repair and upgrading. In the specific case of Tank 241-CX-72, Ecology has identified specific actions that must be taken until the 200-SO-1 Workplan deems otherwise. (See Memo, Mr. David L. Lundstrom to Messrs. J.D. Bauer (RL) and R.E. Lerch (WHC), "Tank 241-CX-72 at the Strontium Semiworks," dated July 7, 1994.)

**Resolution:**

Continued compliance with the actions identified for Tank 241-CX-72 and the TPA schedule for closure represents compliance with the regulatory requirements applicable to these tanks. The interim status standards pertinent to operating hazardous waste tank systems are considered non-applicable to tank systems that are unfit-for-use and deemed for closure.

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This represents the agreement by the specified Agencies to the resolution described above for this compliance issue. The persons signing below represent that they are authorized to agree on behalf of their respective Agencies to this resolution.

Ecology 

Date 4-29-96

DOE Program 

Date 7-17-96

DOE EAP 

Date 7/26/96

**CLOSE OUT FORM**

**ENVIRONMENTAL COMPLIANCE ISSUES  
IDENTIFIED IN DOE/RL LETTER 95-PCA-342  
DATED JULY 6, 1995**

**Tracking Number:** 40.4

**Date:** \_\_\_\_\_

**Compliance Issue Description:**

According to 40 CFR 265.226(a)(2), a dangerous waste surface impoundment (including dikes and vegetation surrounding the dike) must be inspected at least once a week to detect any leaks, deterioration, or failures in the impoundment. Such inspections are not being done at the 216-S-10 Pond and Ditch.

**Basis for Close Out:**

By statute, the 216-S-10 Pond and Ditch were required to cease receipt of hazardous waste by November 8, 1988, and begin closure. These requirements have been met; the closure time frame has been established by the TPA compliance schedule. The 216-S-10 Pond has been backfilled and stabilized; the 216-S-10 Ditch has been stabilized.

Weekly dike inspections at surface impoundments are intended to minimize the possibility of dike failure. Such concerns are pertinent during the operational phase, not during the closure phase after all liquid waste discharges have ceased and no liquid waste remains.

**Resolution:**

A quarterly surveillance frequency (as is currently in place at the 216-S-10 Pond and Ditch) is adequate in lieu of a weekly inspection given the non-operational status of the units and intent of the regulatory provision. Copies of this form will be kept in the Operating Record, the inspection log, and the Closure Plan for the facility.

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This represents the agreement by the specified Agencies to the resolution described above for this compliance issue. The persons signing below represent that they are authorized to agree on behalf of their respective Agencies to this resolution.

Ecology Alisa D. Hucker

Date 5/15/96

DOE Program Thomas Ferris

Date 7-17-96

DOE EAP F. S. R. Mirra

Date 7/26/96

**CLOSE OUT FORM**

**ENVIRONMENTAL COMPLIANCE ISSUES  
IDENTIFIED IN DOE/RL LETTER 95-PCA-342  
DATED JULY 6, 1995**

**Tracking Number:** 40.5

**Date:** \_\_\_\_\_

**Compliance Issue Description:**

According to 40 CFR 265.226(a)(2), a dangerous waste surface impoundment (including dikes and vegetation surrounding the dike) must be inspected at least once a week to detect any leaks, deterioration, or failures in the impoundment. Such inspections are not being done at the 216-B-3 Pond.

**Basis for Close Out:**

By statute, the 216-B-3 Pond was required to cease receipt of hazardous waste by November 8, 1988, and begin closure. These requirements have been met; the closure time frame has been established by the TPA compliance schedule. The 216-B-3 Pond has been backfilled and stabilized.

Weekly dike inspections at surface impoundments are intended to minimize the possibility of dike failure. Such concerns are pertinent during the operational phase, not during the closure phase after all liquid waste discharges have ceased and no liquid waste remains.

**Resolution:**

A quarterly surveillance frequency (as is currently in place at the 216-B-3 Pond) is adequate in lieu of a weekly inspection given the non-operational status of the unit and intent of the regulatory provision.

---

This represents the agreement by the specified Agencies to the resolution described above for this compliance issue. The persons signing below represent that they are authorized to agree on behalf of their respective Agencies to this resolution.

Ecology 

Date 5/15/96

DOE Program Thomas Ferry

Date 7/17/96

DOE EAP F. G. B. White

Date 7/26/96

**CLOSE OUT FORM**

**ENVIRONMENTAL COMPLIANCE ISSUES  
IDENTIFIED IN DOE/RL LETTER 95-PCA-342  
DATED JULY 6, 1995**

**Tracking Number:** 40.8;40.9;40.10

**Date:** \_\_\_\_\_

**Compliance Issue Description:**

According to 40 CFR 265.301(f), (g), and (h), landfills must be designed, constructed, operated, and maintained with a run-on control system capable of preventing flow onto the active portion of the landfill during peak discharge from at least a 25-year storm. Additionally, the owner or operator must design, construct, operate and maintain a run-off management system to collect and control at least the water volume resulting from a 24-hour, 25-year storm. Collection and holding facilities (e.g., tanks or basins) associated with run-on and run-off control systems must be emptied or otherwise managed expeditiously after storms to maintain design capacity of the system. Such run-on/run-off control systems are not in place at the 216-A-37-1, 216-A-10, and 216-A-36B Cribs.

**Basis for Close Out:**

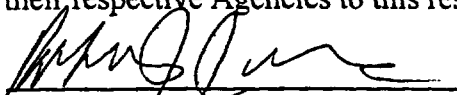
All the units of concern were previously used for disposal of liquid waste through percolation into the soil column. These units (called "cribs") bear little resemblance to true RCRA landfills, but were designated as such during submittal of permitting documents due to the lack of a more appropriate RCRA classification at the time of operation. The affected "landfills" are actually covered, subsurface units that were formerly used for disposal of liquid waste via infiltration to the soil column. Given this disposal scenario, provision of additional run-on/run-off design features to preclude contact with liquid from precipitation was unwarranted: the original waste discharge was in liquid form and was intended to percolate to the soil column. All units are non-operational and are scheduled for closure pursuant to the schedule established in the TPA.

**Resolution:**

No upgrading of the units to provide run-on/run-off control is necessary; the current configuration of the units is adequate for the non-operational phase pending closure.

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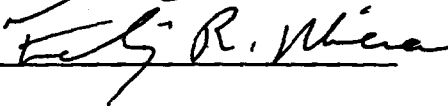
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Ecology 

Date 4/29/96

DOE Program 

Date 7-17-96

DOE EAP 

Date 7/26/96

**CLOSE OUT FORM**

**ENVIRONMENTAL COMPLIANCE ISSUES  
IDENTIFIED IN DOE/RL LETTER 95-PCA-342  
DATED JULY 6, 1995**

**Tracking Number:** 40.15

**Date:** \_\_\_\_\_

**Compliance Issue Description:**

WAC 173-303-310(2)(c) requires that a facility have "an artificial or natural barrier, or a combination of both, which completely surrounds the active portion of the facility, with a means to control access through gates or other entrances to the active portion of the facility at all times." Typically, such barriers are provided by fencing. The 216-A-29 Ditch has no fencing.

**Basis for Close Out:**

According to the EPA, the purpose of the standard of concern is "to prevent the unknowing entry of people, and minimize the potential for the unauthorized entry of people or livestock onto the active portions of the facilities." (See 45 *Federal Register* 33180.) The stabilization and backfilling of the 216-A-29 ditch provides a barrier which, along other Hanford site security provisions, meets this intent.

**Resolution:**

The stabilization and backfilling effort results in a barrier that provides adequate access control, and hence the current configuration is considered compliant with WAC 173-303-310(2).

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This represents the agreement by the specified Agencies to the resolution described above for this compliance issue. The persons signing below represent that they are authorized to agree on behalf of their respective Agencies to this resolution.

Ecology 

Date 5/15/96

DOE Program Thomas Ferns

Date 7-17-96

DOE EAP Greg B. Miera

Date 7/26/96