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**Department of Energy**

Richland Operations Office  
P.O. Box 550  
Richland, Washington 99352  
JUL 14 1995

95-PCA-421

Ms. Jeanne J. Wallace  
Nuclear Waste Program  
State of Washington  
Department of Ecology  
1315 West Fourth Avenue  
Kennewick, Washington 99336

Dear Ms. Wallace:

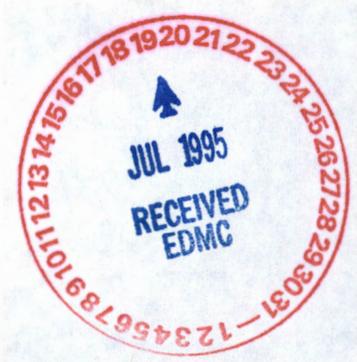
**INITIATION OF PROCEDURAL CLOSURE FOR NONOPERATIONAL TREATMENT, STORAGE AND/OR DISPOSAL UNITS**

Thermal Treatment Test Facilities and Physical Treatment Test Facilities

This letter describes the path forward agreed upon at the May 31, 1995, and June 28, 1995, unit managers meetings for the Pacific Northwest Laboratory (PNL) Nonoperational Units. The U.S. Department of Energy, Richland Operations Office (RL), and PNL hereby notify the Washington State Department of Ecology (Ecology) that procedural closure of the Thermal Treatment Test Facilities and Physical/Chemical Treatment Test Facilities, in accordance with Section 6.3.3 of the Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement), is being initiated.

Procedural closure requires that Ecology be notified in writing that the units never managed hazardous waste. PNL is initiating an internal verification process to document and certify that the units never handled hazardous waste to support the notification to Ecology. The notification shall include a signed certification, using wording specified in WAC 173-303-810(13), that the units were never used to treat, store, or dispose of hazardous waste, including mixed waste, except as provided in WAC 173-303-200 or 173-303-802. Documents supporting the certification will be provided with the notification.

As you suggested, the pursuit of procedural closure for the Thermal Treatment Test Facilities and Physical/Chemical Treatment Test Facilities is being expedited and will be addressed first due to the approaching September 30, 1995, milestone date for the M-20-42A and M-20-43A Tri-Party Agreement milestones that address these units.



It was also agreed that submittal of the procedural closure package will satisfy the requirements of Tri-Party Agreement milestones M-20-42A and M-20-43A for the submittal of closure plans for the two units. Enclosed is a proposed schedule for conducting the activities encompassing the procedural closure process of the two units.

### Biological Treatment Test Facilities

RL and PNL also plan to pursue procedural closure of the Biological Treatment Test Facilities immediately following to meet Tri-Party Agreement milestone M-20-44 that requires the submittal of a Part B Permit Application by December 31, 1995. The procedural closure path forward for this unit was also agreed to at the unit managers meetings.

### 332 Storage Facility and 324 Sodium Removal Pilot Plant

RL and PNL previously requested administrative withdrawal of the Part A Permit Application, Form 3s (Form 3s) for the 332 Storage Facility, in a June 22, 1989, R.D. Izatt and T.D. Chikalla letter to T. Husseman. Administrative withdrawal of the Form 3 was approved for the 332 Storage Facility in an August 17, 1989, R. Stanley letter to R.D. Izatt, R.E. Lerch, and T.D. Chikalla but was never executed. Procedural closure for the two units was agreed to in the above referenced unit managers meetings, but the process to accomplish it has not been addressed. This process can be discussed at the next unit managers meeting for the PNL Nonoperational Units.

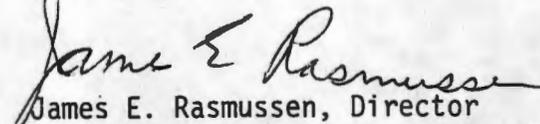
### 324 Sodium Removal Pilot Plant

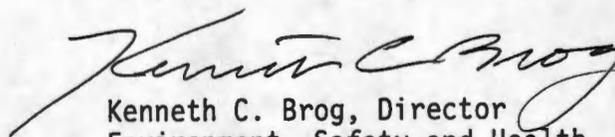
RL and PNL also previously requested administrative withdrawal of the Part A Permit Application, Form 3 (Form 3s) for the 324 Sodium Removal Pilot, in the same June 22, 1989, R.D. Izatt and T.D. Chikalla letter to T. Husseman letter. More information on the 324 Sodium Removal Pilot Plant was requested in the August 17, 1989, R. Stanley letter to R.D. Izatt, R.E. Lerch, and T.D. Chikalla. A response to the request was prepared but was apparently never submitted to Ecology. Procedural closure for the unit has been agreed to in the above referenced unit managers meetings, but the process to accomplish it has not been addressed. This process can be discussed at the next unit managers meeting for the PNL Nonoperational Units.

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If you have any questions regarding the above, please contact Mr. C.R. DeLannoy, RL, on (509) 373-9017 or M.H. Schlender, PNL, on (509) 376-8795.

Sincerely,

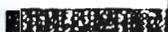
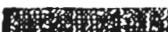
  
James E. Rasmussen, Director  
Environmental Assurance, Permits,  
and Policy Division  
DOE Richland Operations Office

  
Kenneth C. Brog, Director  
Environment, Safety and Health  
Pacific Northwest Laboratory

Enclosure

cc: EDMC, H6-08  
R. Bowman, WHC  
D. Duncan, EPA  
M. Jaraysi, Ecology  
R. Jim, YIN  
D. Powaukee, NPT  
D. Sherwood, EPA  
H. Tilden, PNL  
J. Wilkinson, CTUIR

## Procedural Closure Schedule for Physical Chemical Treatment/Thermal Test Facilities

ID	Task Name	Duration	July							August				September			
			25	2	9	16	23	30	6	13	20	27	3	10	17		
1	<b>Part A Procedural Closures</b>	80d	7/7  9/13														
2	Prepare PNL Internal Certification Package	8d	7/7  7/14														
3	Distribute Certification Package	0d	7/14  7/14														
4	Procedural Closure Workshop	0d	7/18  7/18														
5	Staff Review and Sign Off	14d	7/11  7/28														
6	Unit Manager Meeting	0d	7/27  7/27														
7	Prepare PNL Director Certification Package	3d	<del>7/28</del>  7/31														
8	PNL Certification Concurrence Process	7d	7/31  8/7														
9	PNL Director Certification	0d	8/7  8/7														
10	Prepare PNL Transmittal Package	3d	8/8  8/14														
11	PNL Transmittal Package Concurrence Process	7d	8/7  8/14														
12	Transmit Package to DOE-RL	0d	8/14  8/14														
13	DOE-RL Review and Concurrence Process	14d	8/14  8/28														
14	DOE-RL Certification Process	7d	8/14  8/21														
16	DOE-RL Manager Certifies	0d	8/21  8/21														
18	DOE-RL Transmittal Concurrence Process	2d	8/12  8/13														
17	Procedural Closure Transmittals to Ecology	0d	8/13  8/13														

5/13/15

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