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Department of Energy
Richland Operations Office
P.O. Box 550
Richland, Washington 99352

OCT 04 1996

96-EAP-008

Mr. Moses N. Jaraysi
200 Area Unit Supervisor
Nuclear Waste Program
State of Washington
Department of Ecology
1315 West Fourth Avenue
Kennewick, Washington 99336-6018

Dear Mr. Jaraysi:

HANFORD SITE COMMENTS ON THE MODIFICATION PACKAGE ISSUED FOR PUBLIC COMMENT ON AUGUST 21, 1996, FOR THE HANFORD FACILITY RESOURCE CONSERVATION AND RECOVERY ACT PERMIT, DANGEROUS WASTE PORTION

The U.S. Department of Energy, Richland Operations Office (RL) and Fluor Daniel Hanford, (FDH) jointly are submitting the "Hanford Site Comments on the Modification Package Issued for Public Comment on August 21, 1996, for the Hanford Facility Resource Conservation and Recovery Act (RCRA) Permit, Dangerous Waste Portion" (hereinafter termed the "Comment Document"). This Comment Document was prepared in response to a Washington State Department of Ecology (Ecology) request for comments initiated on June 8, 1995.

The proposed modification will incorporate five units into the Hanford Facility RCRA Permit: the 300 Area Process Trenches, 303-K Storage Facility, 3718-F Alkali Metal Treatment and Storage Facility, 4843 Alkali Metal Storage Facility, and PUREX Tunnels Number 1 and 2. Adoption of the proposed modification generally is supported; however, there are a few specific areas that merit further consideration by Ecology. The Comment Document addresses those areas that could be enhanced by additional clarification or explanation.

Incorporation of these comments into the modification, as finally adopted, will enhance efforts to meet our collective objective of ensuring the most expeditious, efficient, and comprehensive reclamation of the Hanford Facility. We request incorporation of these comments in the spirit of continuing open communication with, and responsiveness to, your organization.



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Mr. Moses N. Jaraysi
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-2-

If you have any questions regarding the contents of this letter or the enclosure, please contact Clifford E. Clark, RL, on (509) 376-9333, or Susan M. Price, FDH, on (509) 376-1653.

Sincerely,

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

EAP:EMM

William D. Adair
William D. Adair, Director
Environmental Protection
Responsible Party for
Fluor Daniel Hanford, Inc.

Enclosure:
Comments on Modification B to
the Hanford Facility RCRA Permit,
Dangerous Waste Portion

cc w/encl:
EDMC, H6-08
E. Flores, PNNL
R. Jim, YIN
R. Landon, BHI
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cc w/o encl:
W. Adair, FDH
K. Brog, PNNL
M. Hughes, BHI
D. Lundstrom, Ecology
D. Sherwood, EPA
J. Stohr, Ecology



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HANFORD SITE COMMENTS
ON THE MODIFICATION PACKAGE ISSUED FOR PUBLIC COMMENT ON AUGUST 21, 1996, FOR
THE HANFORD FACILITY RESOURCE CONSERVATION AND RECOVERY ACT PERMIT, DANGEROUS
WASTE PORTION

Page 1 of 3

**Comments on the 3718-F Alkali Metal Treatment
and Storage Facility Closure Plan**

1. **Condition:** V.13.A. COMPLIANCE WITH THE APPROVED CLOSURE PLAN
Requested Action: Delete the second paragraph.
Comment Justification: The statement indicating that the treatment, storage, and/or disposal (TSD) unit released dangerous waste or constituents to the soil and concrete pad is unfounded. There was no evidence brought up in the closure plan or in the data quality objective (DQO) process to state unequivocally that material was spilled. The paragraph should not state anything that was not previously identified in the Hanford Facility RCRA Permit, closure plan, or regulations.

2. **Condition:** V.13.B.b. AMENDMENTS TO THE APPROVED CLOSURE PLAN
Requested Action: Rewrite the condition as follows: "A supplemental DQO process will be conducted to address soil sampling. The results of the supplemental DQO process will be used to determine the extent of any additional sampling at the 3718-F. During the DQO process, it also will be determined what type of documentation will be required for any sampling efforts. Items to be addressed during the DQO include, but are not limited to, number of samples, location of samples, analytes of concern, appropriate level of QA/QC, and laboratory methods."
Comment Justification: Using the DQO process will allow Ecology and the Permittees the flexibility to determine the appropriate level of sampling and analytical needs. The permit conditions as written allow for no flexibility; if the Permittees needed to deviate from any of the conditions, as written, they could have to do a permit modification. The DQO process always has been used in the past to indicate what types of sampling and analytical needs will be used to complete closure.

3. **Condition:** V.13.B.d.
Requested Action: Delete this condition.
Comment Justification: This condition already is addressed in V.13.B.b.

4. **Condition:** V.13.B.l.
Requested Action: Delete this condition.
Comment Justification: This information already is included in WAC 173-303 and in the Tri-Party Agreement Action Plan.

5. **Condition:** V.13.C.a.
Requested Action: Delete this condition.
Comment Justification: The documents cited in this condition are in error, not the closure plan.

Comments on the 303-K Storage Facility

1. Condition: V.14.A. COMPLIANCE WITH THE APPROVED CLOSURE PLAN

Requested Action: For Appendix F, reword title as follows: Quality Assurance Project Plan for Sampling and Analysis for the ~~304-Concretion~~ 303-K Storage Facility Closure Activities.

Comment Justification: Correct unit name.

2. Condition: V.14.B.b.

Requested Action: Rewrite as follows: The results of all sampling required by the Plan shall be provided to Ecology. This submittal shall include ~~raw analytical data~~, a summary of analytical results, a data validation package, and a narrative summary of conclusions. Raw analytical data will be provided to Ecology upon request.

Comment Justification: This rewrite conforms with Ecology's request in previous closure plans not to provide raw analytical data.

3. Condition: V.14.B.c.

Requested Action: Rewrite as follows: Ecology shall be provided, for review and approval, a sampling and analysis plan and date of sampling for any sampling event not addressed in the Plan, which provides data used to support the 303-K cleanup activities at least 30 days prior to initiating actual sampling activities. The results of this sampling shall be submitted to Ecology. These submittals shall include ~~the raw analytical data~~, a summary of analytical results, a data validation package, and a narrative summary of conclusions. Raw analytical data will be provided to Ecology upon request.

Comment Justification: This rewrite conforms with Ecology's request in previous closure plans not to provide raw analytical data.