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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

1315 W. 4th Avenue • Kennewick, Washington 99336-6018 • (509) 735-7581

October 31, 1994

Mr. Robert G. Holt
Department of Energy
P.O. Box 550
Richland, WA 99352

Mr. Joe F. Nemec
Bechtel Hanford, Inc.
P.O. Box 969
Richland, WA 99352



Dear Messrs. Holt and Nemec:

Re: 200-BP-11 Operable Unit and 216-B-3 Main Pond and Ditch
Work/Closure Plan, Volume 1, Draft A

The Washington State Department of Ecology (Ecology) has received the Draft A of the 200-BP-11 Operable Unit (OU) and 216-B-3 Main Pond and Ditch work/closure plan ((DOE/RL-93-74). Modifications to the Tri-Party Agreement (TPA) require incorporation of two additional Resource Conservation and Recovery Act (RCRA) Treatment, Storage, and Disposal (TSD) units into the 200-BP-11 OU. Milestone M-20-36 requires the submittal of the 216-A-29 Ditch and 216-B-63 Trench Closure/Postclosure Plans to Ecology and the Environmental Protection Agency (EPA) in coordination with the Work Plan for OU 200-BP-11 by June 30, 1995.

Since agreement to incorporate the two TSDs, the U.S. Department of Energy and Bechtel Hanford, Inc. have proposed three past-practice waste management units (216-B-2-1, -2, and -3, currently part of 200-BP-8) be incorporated into the coordinated effort. Due to the proximity and similarity of suspect contamination at these Past-Practice units, Ecology feels this is appropriate. A TPA change package should be developed to incorporate the additional Past-Practice units into the 200-BP-11 OU. As a condition of concurrence, Ecology requires a schedule be developed and submitted by December 15, 1994. The schedule is to be included in the change package and should address document development and implementation of activities to meet the June 30, 1995, milestone.

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Ecology will not conduct a formal review of the work/closure plan until it is modified to reflect the revision of scope. In light of the pending revision, only a cursory review of the introduction, chapter 1.0, has been conducted. Ecology recommends the following comments be incorporated into the next revision of the Work/Closure Plan.

- In regard to the RCRA closure, it must be made explicit that volume 1 will only fulfill the sampling and analysis requirements of a RCRA closure. This is not stated until page 1-4.
- This document must fulfill the closure requirements for the TSDs to be closed in this integrated effort. Currently, the document only peripherally addresses the RCRA/Dangerous Waste Regulations.
- No state or federal RCRA guidance is included in the "relevant EPA guidance documents" section of the document. Most of the guidance documents are CERCLA guidance documents. The Past-Practice units being addressed are RCRA Past-Practice.
- In several places the 216-B-3 Pond System Closure/Postclosure Plan (DOE-RL 1990a) is referenced. This document has not been reviewed or approved and, therefore, cannot be cited. The 216-B-3 Pond System now consists of two TSDs, one of which the submitted Work/Closure Plan is supposed to fulfill the RCRA sampling and analysis requirements for closure.

If you have any questions, please call me at (509) 736-3019.

Sincerely,



Jeanne Wallace
Unit Manager
Nuclear Waste Program

JW:skr

cc: Ellen Mattlin, USDOE
Donna Wanik, USDOE
Rhett Tranbarger, BHI
Andrea Prignano, WHC
Fred Ruck, III, WHC

Paul Beaver, EPA
Dan Duncan, EPA

Administrative Records:

216-B-3 Expansion Ponds
216-B-3 Main Pond/Ditch
200-BP-11 Operable Unit

9413205-0554