1220954

[0088314]

WASTE SITE RECLASSIFICATION FORM

Operable Unit: 300-FF-2 **Control No.:** 2001-100

Waste Site Code(s)/Subsite Code(s): 311-TK-40

Reclassification Category: Interim ☐ Final ☒

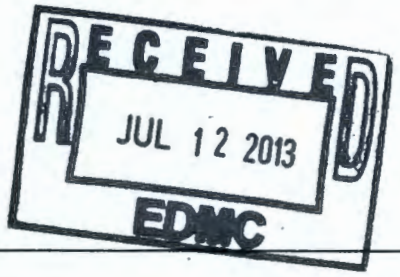
Reclassification Status: Closed Out ☒ No Action ☐ Rejected ☐

RCRA Postclosure ☐ Consolidated ☐ None ☐

Approvals Needed: DOE ☒ Ecology ☒ EPA ☐

Description of current waste site condition:

Quoting from the Professional Engineer's (PE) Partial Closure Certification (signed June 7, 2001): "Partial closure activities for the 300 Area Waste Acid Treatment System (300 Area WATS) are now complete. The attached certification statement was prepared in accordance with WAC 173-303-610 (6) to independently certify that the 300 Area WATS partial closure activities were performed in accordance with the approved 300 Area Waste Acid Treatment System Closure Plan (DOE/RL-90-11, Rev. 2, dated May 1999). This closure plan is considered approved by the Washington State Department of Ecology through Ecology acceptance of the plan as complete in a letter dated July 27, 1999. and because the plan underwent public review without comment. Partial closure activities included the activities necessary to clean close all 300 Area WATS aboveground structures and components and most soils. Not all soil potentially contaminated by WATS operations could be clean closed at the time of partial closure." The December 3, 2001, DOE Partial Closure Certification noted that "The unclosed locations include two areas of potential soil contamination from 300 Area WATS operations that are defined in the closure plan. These areas will remain unclosed and RCRA regulated until soil disposition in conjunction with the future 300-FF-2 CERCLA OU remedial action that will complete 300 WATS closure."



Basis for reclassification:

This site was clean closed as part of the 300 Area Waste Acid Treatment System (300 Area WATS) partial closure. The closure certifications include the Professional Engineer (PE) Partial Closure Certification, the U.S. DOE Partial Closure Certification (Attachment 1), and Ecology's approval of the U.S. DOE's certification for partial clean closure of the 300 Area WATS (Attachment 2).

300-FF-2

WASTE SITE RECLASSIFICATION FORM

Operable Unit: 300-FF-2 **Control No.:** 2001-100

Waste Site Code(s)/Subsite Code(s): 311-TK-40

Regulator Comment:

Waste Site Controls:

Engineered Controls: ☐ Yes ☒ No Institutional Controls: ☐ Yes ☒ No O&M Requirements: ☐ Yes ☒ No

If any of the Waste Site Controls are checked Yes, specify control requirements including reference to the Record of Decision, TSD Closure Letter, or other relevant documents:

T. K. Teynor		6-24-2013
DOE Federal Project Director (printed)	Signature	Date
F. W. Bond	Frederick W. Bond	6-27-13
Ecology Project Manager (printed)	Signature	Date
L. E. Gadbois	Larry Gadbois	July 8, 2013
EPA Project Manager (printed)	Signature (concurrence)	Date

311-TK-40, 311-TK-50, 333-TK-11, AND 333-TK-7 WASTE SITES

Attachment to Waste Site Reclassification Forms 2001-100, 2001-101, 2001-105, 2001-109

June 2013

0106993
OC Rec'd: 12/07/2001

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

02-RCA-068

DEC 03 2001

Mr. P. C. Jamison, Manager
Waste Management Projects
State of Washington
Department of Ecology
1315 West Fourth Avenue
Kennewick, Washington 99336

Dear Mr. Jamison:

PARTIAL CLOSURE CERTIFICATIONS FOR THE 300 AREA WASTE ACID TREATMENT SYSTEM (TS-3-1)

Enclosed for State of Washington Department of Ecology (Ecology) acceptance are the following completed 300 Area Waste Acid Treatment System (300 Area WATS) Partial Closure Certifications:

- Professional Engineer (PE) Partial Closure Certification prepared by Mr. Ron Hollenbeck, Fluor Federal Services, Richland Washington (Enclosure 1); and
- U.S. Department of Energy, Richland Operations Office (RL) and Fluor Hanford (Owner/Operator) Partial Closure Certification (Enclosure 2).

These certifications were prepared as required by Washington Administrative Code (WAC) 173-303-610(6), and Section 7.10 of the 300 Area WATS Closure Plan (DOE/RL-90-11, Rev. 2), and attest that closure activities for the 300 Area WATS are complete and were performed in accordance with the approved closure plan. This closure plan underwent public review without comment and was approved by Ecology in a letter dated July 27, 1999.

Corrective action requirements for the 300 Area WATS will be satisfied in accordance with Hanford Facility Resource Conservation and Recovery Act of 1976 (RCRA) Permit, Revision 6, Dangerous Waste Portion, Section II.Y.2.c.ii. Corrective action locations are identified in the Waste Identification Data System. Final disposition of these locations will occur in conjunction with the future 300-FF-2 Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA) operable unit (OU) remedial action. The schedule for OU remedial actions is provided in the Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement).

Background
The 300 Area WATS operated from 1973 until 1995 as a RCRA tank system that treated and stored mixed and dangerous waste acid generated from fuel fabrication activities occurring within the 300 Area of the Hanford Site. The 300 Area WATS closure will occur as a two-step process because not all soil potentially contaminated by WATS operations can be clean closed at this time. The first closure step is partial closure that has been completed under this closure plan in three sequential phases, Phases 1, 2, and 3. The second step is final closure that will occur at a later date under other closure documents. Partial closure activities included the activities necessary to clean close all 300 Area WATS aboveground structures and components and most soils. The unclosed locations include two areas of potential soil contamination from 300 Area WATS operations that are defined in the closure plan. These areas will remain unclosed and RCRA regulated until soil disposition in conjunction with the future 300-FF-2 CERCLA OU remedial action that will complete 300 Area WATS closure.

Ecology acceptance of these certifications will grant the 300 Area WATS partial clean closure, thereby releasing the clean closed locations from the requirements of RCRA and Chapter 173-303 of the WAC. At that time, the 300 Area WATS Part A, Form 3, will be revised to remove the clean closed locations from the TSD unit boundary. Timely Ecology response will allow completion of these closure steps this fiscal year while funding remains available.

If you have questions or need further information, please contact Gloria Williams, of my staff, on (509) 372-0586, or R. Leo Guillen, RL Facility Transition Division, on (509) 376-0254.

Sincerely,

Joel Hebdon

Joel Hebdon, Director
Regulatory Compliance and Analysis Division

RCA:GAW

Enclosures

cc w/encls:
G. P. Davis, Ecology
R. H. Englemann, FHI
R. H. Gurske, FHI
J. D. Hervey, LMSI
R. Jim, YN
S. N. Luke, FHI
J. K. Perry, FHI
J. Richards, CTUIR
D. R. Sherwood, EPA
P. Sobotta, NPT
M. A. Wilson, Ecology
Environmental Portal, LMSI
Ecology Library, Kennewick

PARTIAL CLOSURE CERTIFICATION
FOR
300 AREA ACID WASTE TREATMENT SYSTEM

We, the undersigned, hereby certify that 300 Area Acid Waste Treatment System partial closure activities were performed in accordance with the specifications in the Closure Plan, approved by Ecology in a letter dated July 27, 1999.

Owner/Operator
Keith A. Klein, Manager
U.S. Department of Energy
Richland Operations Office

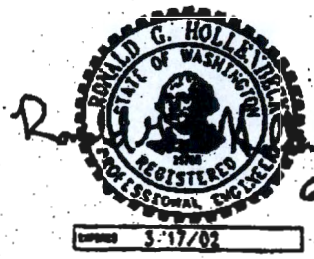
12/3/01
Date

Co-operator
D. B. Van Leuven
Executive Vice President
and Chief Operating Officer
Fluor Hanford, Inc.

11/8/01
Date

PROFESSIONAL ENGINEER'S CERTIFICATION STATEMENT
PARTIAL CLOSURE OF THE 300 AREA WASTE ACID TREATMENT SYSTEM

I, the undersigned, an independent registered Professional Engineer, hereby certify that, to the best of my knowledge, all partial closure activities for the 300 Area Waste Acid Treatment system were performed in accordance with the specifications in the approved closure plan. This certification is based on review of documents as described in the attached Specifications and Limitations of Professional Engineer's Certification.



6-7-01

EXPIRES 3-17-02

Ronald G. Hollenbeck, P.E.
Washington #23750
Fluor Daniel Northwest Inc.

SPECIFICATIONS AND LIMITATIONS OF PROFESSIONAL ENGINEER'S CERTIFICATION FOR PARTIAL CLOSURE OF THE 300 AREA WASTE ACID TREATMENT SYSTEM

Partial closure activities for the 300 Area Waste Acid Treatment System (300 Area WATS) are now complete. The attached certification statement was prepared in accordance with WAC 173-303-610(6) to independently certify that the 300 Area WATS partial closure activities were performed in accordance with the approved *300 Area Waste Acid Treatment System Closure Plan* (DOE/RL-90-11, Rev 2, dated May 1999). This closure plan is considered approved by the Washington State Department of Ecology (Ecology) through Ecology acceptance of the plan as complete in a letter dated July 27, 1999 and because the plan underwent public review without comment.

The closure plan describes 300 Area WATS closure as a two-step process. The first step is 'partial' closure that was completed under the aforementioned closure plan. The second step is 'final' closure that will occur at a later date under other closure documents. Partial closure activities included the activities necessary to clean close all 300 Area WATS aboveground structures and components and most soils. Not all soil potentially contaminated by WATS operations could be clean closed at the time of partial closure.

Partial closure activities occurred in three sequential phases, Phase 1, Phase 2, and Phase 3, that were completed in 1997, 1998, and 1999, respectively. Partial closure activities were completed prior to closure plan approval. Ecology concurrence with the closure activities before they were performed was obtained through Ecology approval of a Decontamination and Inspection Plan (DIP) for each phase. The DIPs are included by reference in the approved closure plan. As required by the DIPs and the closure plan, closure activities were verified by visual inspections that were documented on location-specific inspection checklists provided by each DIP. Ecology also inspected the closure areas and formally concurred that the closure activities and results were in accordance with the approved DIP. Closure activities for each phase were PE-certified upon completion as having been performed in accordance with the specifications of the Ecology approved DIP.

Closure documentation provided for review in support of certification of partial closure activities included the approved closure plan, each phase-specific DIP, completed visual verification checklists, PE certification for each closure phase, and an Ecology letter accepting each phase. The attached PE statement certifies that all physical closure activities required to complete partial closure were in accordance with the approved closure plan. The PE statement is not intended to certify the extent to which the overall objectives of the closure plan have been met.

0107105
CC Rec'd: 12/17/2001

STATE OF WASHINGTON

DEPARTMENT OF ECOLOGY

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

December 6, 2001

Mr. Joel Hebdon, Director
Regulatory Compliance and Analysis Division
U.S. Department of Energy
P.O. Box 550, MSIN: A5-58
Richland, Washington 99352

Dear Mr. Hebdon:

Re: 300 Area Waste Acid Treatment System Professional Engineer Partial Closure Certification (DOE/RL-01-RCA-068)

This letter formally acknowledges the Washington State Department of Ecology's (Ecology) receipt of the U.S. Department of Energy (USDOE) closure certification and professional engineer's certification of partial closure for the 300 Area Waste Acid Treatment System (WATS) dated December 3, 2001. This unit partial closure was conducted in accordance with Washington Administrative Code (WAC) 173-303 and the specifications of the approved partial closure plan.

Ecology accepts and approves the USDOE's certification for partial clean closure for the 300 Area WATS. The USDOE is, therefore, requested to resubmit the revised Part A Form 3 for this unit identifying the portions of the unit that have been clean closed under the Resource Conservation and Recovery Act (RCRA) and the portions that will be integrated with the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) remediation requirements for the associated operable unit. In future modifications of the RCRA Facility Wide Permit, Ecology will indicate this unit was partially clean closed as of December 3, 2001.

Ecology looks forward to many more successes such as this. If you have any questions or concerns, please call Greta Davis at (509) 736-3025.

Sincerely,

Greta P. Davis
Nuclear Waste Program

GD:lkd

Post-it® Fax Note 7671	Date	# of pages ▶
To Jeh Peery	From Joel Williams	
Co./Dept.	Co.	
Phone #	Phone # 376-4292	
Fax # 373-0937	Fax #	

cc: Doug Sherwood, BPA
Ellen Mattila, USDOE
Brett Barnes, FH
Roger Bowman, FH
Scott Luke, FH
Joel Williams, FH
J.H. Richards, CTUIR
Donna Powaukee, NPT
Russell Jim, YN
Ken Niles, ODE
Administrative Record: 300 Area WATS (TS-3-1)