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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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November 24, 2003

Mr. Kent Westover, Project Manager
Environmental Restoration Division
Richland Operations Office
U.S. Department of Energy
P.O. Box 550, MSIN: HO-12
Richland, Washington 99352

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EDMC

Mr. Loren Oakes, Site One/HGP Manager
Energy Northwest
P.O. Box 968, Mail Drop 817
Richland, Washington 99352

Dear Messrs. Oakes and Westover:

Re: Hanford Generating Plant in Situ Disposal and Documentation Requirements

In a letter dated August 6, 2001, the Washington State Department of Ecology (Ecology) made the determination that in situ burial at the Hanford Generating Plant (HGP), in accordance with the substantive requirements for inert/demolition landfills, is within the scope of the Engineering Evaluation/Cost Analysis (EE/CA) for the 100-N Ancillary Facilities and Integration Plan (DOE/RL-97-22) and the resulting 100 N Area Ancillary Facility Action Memorandum (January 6, 1999). Energy Northwest has requested that Ecology provide further clarification regarding the requirements for an inert/demolition landfill. More specifically, you requested additional information on the use of demolition waste as backfill in the excavation, the need to remove residual contamination from within the facility, and the format for documenting that the Solid Waste Management Units (SWMU's) have been remediated and that the Decontamination and Decommissioning (D&D) of the HGP facility has been completed according to the requirements of the action memorandum.

Use of demolition waste as backfill: Uncontaminated and decontaminated debris, inert rubble, and other miscellaneous structural material (i.e., demolition waste) can be used to fill void spaces resulting from the demolition of the below-grade structures. Demolition waste is defined as solid waste, largely inert waste, resulting from the demolition or razing of buildings, roads, and other man-made structures. Demolition waste consists of, but is not limited to, concrete, brick, bituminous concrete, masonry, steel, and minor amounts of other metals like copper



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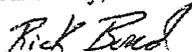
(Washington Administrative Code [WAC] 173-304-100). Materials that do not meet the definition of demolition waste should not be placed in the facility as backfill.

Removal of residual contamination from within the facility: Every effort should be made to remove residual contamination from surfaces within the HGP facility. The in situ burial of the HGP should comply with the requirements in WAC 173-340-461 for inert waste and demolition landfilling facilities. In accordance with these regulations, inert wastes means noncombustible, nondangerous solid wastes that are likely to retain their physical and chemical structure under expected conditions of disposal, including resistance to biological attack and chemical attack from acidic rainwater (WAC 173-304-100). In our meeting on November 17, 2003, we reviewed the sampling results for SWMU's, tanks, exhaust vents, and drains within the HGP facility. Based on the information provided and the plans to close the facility by filling tanks and storage units with grout, fill or cover potentially radiologically contaminated material in the basement with grout, and backfilling the entire facility with inert rubble, debris, and soil, Ecology believes that the facility will be left in a condition that does not pose a potential risk to human health or the environment.

Documenting completion of D&D of the HGP facility: Ecology recommends that you use the Cleanup Verification Package (CVP) for the 105-DR Reactor (CVP-2003-00016, Rev. 0) as a guide for documenting completion of the D&D activities at the HGP facility. In addition, WAC 173-304-461 provides guidance on what to include in closure documentation for inert waste and demolition waste landfills. In summary, closure documentation should provide adequate information so that Ecology can verify compliance with regulatory requirements in Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and Applicable, Relevant, an Appropriate Requirements (ARARs) (e.g., WAC 173-304-461, WAC 173-340-705, etc). Pictures, maps, and figures should be provided, where available, to enhance the documentation of cleanup actions. Additional documentation, such as maps and statement of fact concerning the location of the inert landfill, should be recorded with the county auditor as required by CERCLA and ARARs.

If you have any questions, feel free to contact me at (509) 736-3007.

Sincerely,



Rick Bond
Facility Transition Project Manager
Nuclear Waste Program

cc: Todd Martin, HAB Pat Sobotta, NPT Ken Niles, OOE
 Rick Gay, CTUIR Russell Jim, YN Administrative Record: HGP, Energy NW