

Department of Energy

Idaho Operations Office
785 DOE Place
Idaho Falls, Idaho 83402

November 15, 1989

Mr. Michael Gearheard
Chief, Waste Management Branch
U. S. Environmental Protection Agency
1200 Sixth Avenue
Seattle, Washington 98101

SUBJECT: Response to Notice of Deficiency (NOD) for Closure Plan Submittal
Received from the EPA/State

Dear Mr. Gearheard:

The Notice of Deficiency (NOD) for Closure Plan submittal received from the EPA and State of Idaho identified 11 Land Disposal Units (LDUs) that the EPA/State (hereafter the Agencies) consider to be clean closure candidates. It is understood that by the NOD the Agencies are requiring the submittal of Closure Plans for five of the 11 LDUs on May 15, 1990, and three on June 26, 1990. The characterizations undertaken for each LDU must be sufficient to properly assess all contaminants and possible contaminant migration, and for a proper assessment of the closure process which must be undertaken.

Additionally, the NOD requires Monthly Closure Plan status reports to be submitted to the Agencies no later than 7 days after the first day of each month. DOE-ID interprets this to mean 7 "working" days unless otherwise notified.

Finally, the NOD requires the submittal on January 12, 1990, of a schedule demonstrating dates for the submittal of Closure Plans for the remaining LDUs.

The 11 clean closure candidates identified in the NOD are:

	<u>Unit ID. No.</u>	<u>Unit Name</u>
EG&G Units	CFA-05	Motor Pool Pond
	TRA-06	Chemical Waste Pond
	TRA-02	Paint Shop Ditch
	ARA-01	Chemical Evaporation Pond
	PBF-10	Reactor Area Evaporation Pond
	PBF-08	Reactor Area Corrosive Waste Disposal Sump Brine Tank
WINCO Units	CPP-39	HF Storage Tank and Dry Well
	CPP-59	Kerosine Spill
	CPP-64	Hexone Spill
	CPP-23	Injection Well
	CPP-34*	Contaminated Soil Trench

*This LDU is understood not to be a clean - closure candidate.

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Closure Plans will be submitted for EG&G units according to the following schedule:

<u>Unit ID. No.</u>	<u>Unit Name</u>	<u>Closure Plan Submittal Date</u>
CFA-05	Motor Pool Pond	May 15, 1990
PBF-10	Reactor Area Evaporation Pond	May 15, 1990
PBF-08	Reactor Area Brine Tank	May 15, 1990
TRA-02	Paint Shop Ditch	June 26, 1990
TRA-06	Chemical Waste Pond	June 26, 1990
ARA-01	Chemical Evaporation Pond	June 26, 1990

Closure plans will be submitted for WINCO units according to the following schedule:

<u>Unit ID. No.</u>	<u>Unit Name</u>	<u>Closure Plan Submittal Date</u>
CPP-23	Injection Well	March 30, 1990
CPP-34	Contaminated Soil Trench	June 18, 1990
CPP-64	Hexone Spill	July 19, 1990
CPP-39	HF Storage Tank and Dry Well	December 6, 1990
CPP-59	Kerosine Spill	November 8, 1990

As shown in Attachment 1, characterization of CPP-39 and CPP-59 is scheduled to be two-phased; shallow drilling will be conducted in 1989 and deep drilling in the spring of 1990. A two-phase approach is necessary so that procurement for deep drilling can be completed. In addition, it will allow adequate time for reviewing data from the 1989 characterization effort and documenting the results, and time to plan and prepare for the 1990 field season.

In summary, development of closure plans for CPP-59 and CPP-39 which meet the quality requirements identified in the NOD (i.e. based on characterization "sufficient to properly assess all contaminants and possible contaminant migration, and for a proper assessment of the closure process...") will require submittal dates beyond May 15, 1990, as shown above and on Attachment 1. This approach has been discussed with EPA and State personnel. DOE-ID hopes that both agencies will concur with this approach to satisfy the requirements of both quality and timeliness.

Please note that the submittal date for CPP-23 is March 30, 1990, as shown in the original schedule.

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DOE-ID will submit, on January 12, 1990, a schedule for submittal of Closure Plans for all remaining LDUs.

Sincerely,



J. E. Solecki
Acting Assistant Manager
for Nuclear Programs

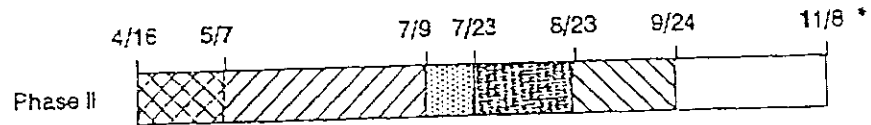
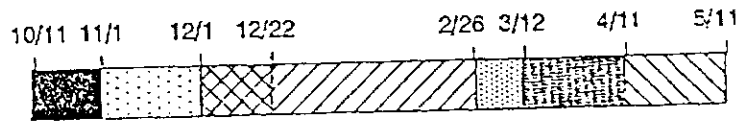
Enclosure

cc: C. R. Koshuta, IDH&W
D. J. Blumberg, EG&G
G. Sehlke, WINCO
D. J. Bergquist, DOE-ID
C. R. Nichols, DOE-ID
I. Resendez, DOE-ID

Closure Plan Schedule for CPP-39 & CPP-59

LDU CPP-59

Preliminary
Sampling



LDU CPP-39

Tank and
Containment

