



## Department of Energy

Idaho Operations Office  
785 DOE Place  
Idaho Falls, Idaho 83402  
September 1, 1989

Mr. Michael Gearheard, Chief  
Waste Management Branch  
U.S. Environmental Protection Agency  
Region 10  
1200 Sixth Avenue  
Seattle, WA 98101

SUBJECT: Revised Closure Plan Approach for Land Disposal Units (LDU's)

Dear Mr. Gearheard:

The purpose of this letter is to reach formal confirmation of the current approach for revising and resubmitting closure plans for LDU's at the Idaho National Engineering Laboratory (INEL). The current approach was developed through a series of discussions between Hunter Weiler of my staff, Steve Hill and Brian Munson of the State of Idaho, and Jeff Rodin of EPA. The schedule changes agreed to in these discussions are designed to improve the process and eliminate perceived inadequacies in the submittals. The new approach eliminates the submittal of the fifteen closure plans scheduled between September 8, 1989, and February 16, 1990, and instead shifts resources immediately to field characterization of LDU's.

In my May 16, 1989, letter to you documenting the old schedule agreed to by DOE, EPA, and the State of Idaho, revised closure plans were to have been, at that time, submitted approximately every two weeks through February 1990. To date, this schedule has been met with a total of sixteen revised closure plans submitted since January 1989. However, the May schedule did not allow time for field characterization of sites prior to preparation of these closure plans. As discussed, the parties agree that characterizations prior to submittal of closure plans will enhance the quality of all future closure plans to be submitted.

EG&G has been specifically directed to immediately initiate or accelerate characterization and/or remediation of the following LDU's:

ARA-01-ARA Chemical/Evaporation Pond

CFA-02-Landfill II

CFA-03-Landfill III

CFA-05-Motor Pool Pond

PBF-10-Reactor Area Evaporation Pond

TRA-02-Paint Shop Ditch

TRA-06-Chemical Waste Pond

TSF-07-Disposal Pond

Additionally, WINCO has been directed to initiate or accelerate characterization and/or remediation of the following LDU's and associated Solid Waste Management Units (SWMU's):

LDU CPP-39	CPP HF Storage Tank (YDB-105) and Dry Well
SWMU CPP-51	PCB Staging Area West of CPP-660
SWMU CPP-54	Drum Storage Area West of CPP-660
LDU CPP-59	Kerosene Tank Overflow West of CPP-633
LDU CPP-64	Hexane Spill West of CPP-660
LDU CPP-23	CPP Injection Well (MAH-FE-304)
LDU CPP-33	Tank Farm
LDU CPP-34	Soil Storage Area in the NE Corner of the CPP
LDU CPP-55	Mercury Contaminated Area South of CPP T-15

It is planned that characterization and/or remediation activities will be conducted on all remaining LDU's during 1990. Monthly status reports on characterization and remedial activities will be submitted to EPA and the State postmarked within five days of the end of each month beginning with the month of September. Schedules for submittal of future closure plans will be negotiated with EPA and the State as characterization results become available and are sufficient for detailed schedule preparation.

In light of current sensitivities regarding DOE's environmental compliance, we request written confirmation by EPA and the State of this new approach for closure of the LDU's. It is my understanding that Brian Munson has agreed to prepare a confirmation letter to be jointly signed by EPA and the State. As the current COCA schedule requires a closure plan to be submitted on September 8, 1989, for the PBF 10 Reactor Evaporation Pond it is requested that we receive the EPA/State confirmation letter before that date. This should avoid any appearance that DOE may be out of compliance with the current schedule.

This new schedule and approach should enhance the quality of the closure plans, provide efficient use of staff resources of all involved organizations, and allow for more rapid initiation and completion of field activities. The excellent working relationship among the State, DOE, EPA, and contractor staff which has culminated in this new approach and schedule should facilitate successful implementation of the subsequent details of the new approach. DOE, WINCO and EG&G staff are prepared to meet in Boise with representatives of the State and EPA in September to work out details of the revised approach.

Thank you very much for your cooperation and support. If you have any questions, please contact Hunter Weiler at (208) 526-0601.

Sincerely,



J. E. Solecki  
Acting Assistant Manager  
for Nuclear Programs

cc: J. H. Barry, DOE-ID  
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*Jon*  
*Please have them add my name*  
*to DST.*