

Comments on B123 Closure Plan

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Section 6.1.1 and 7.1.1 are not clear.

Part 6.1.1 of the closure plan lists many chemicals that cannot be hazardous waste, and does not list those that made the system a hazardous waste unit. Previous Part A Permits for Unit 40 included the following EPA hazardous waste codes, and these should be addressed in the closure plan. If these waste codes do not apply then an explanation should be given.

Part A	Included in Section 6 of Closure Plan
D001	No
D002	Yes, acids and bases
D004	No
D005	No
D006	No
D007	No
D008	No
D009	No
D010	No
D011	No
D018	No
D019	No
D028	No
D029	No
D035	No
D038	No
D040	No
D043	No
F001	No
F002	No
F003	No
F005	Yes (Toluene)
F007	No
F008	No
F009	No

TED HOPKINS

Kent - 5215 10/27
 Here are Grosek's comments
 on B123 RCRA Closure Plan
 Looks different & extensive
 Please get these addressed ASAP
 Bill Felt

The system must be treated for these constituents - not those listed in the closure plan. Most of the ones in the closure plan are irrelevant for RCRA closure.

List each constituents and the associated standard each constituent will be compared to, so a determination of pass/fail can clearly be made. RFCAs Attachment 5 standards appear to be more stringent than RCRA standards. Why are RFCAs Attachment 5 standards used rather than the RCRA standards already used and accepted at the Site?

All the above information should clearly be presented in Section 7.0 Closure Performance Standard. Will the absolute standard "all visible waste residuals have been removed" work? Even the RCRA clean debris surface standard allows 5% to remain.

Section 7.1.1 should list all constituents included in the Performance standard and the criteria.

Section 7.3. How are we going to look at the inside of pipes? This approach does not seem practical.

Section 6.1.1 includes radionuclides as being present, however, there is no mention of radiation protection or sampling the plan.

ADMIN RECORD

B123-A-000134

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**TABLE 6-1
MODIFIED TARGET ANALYTE LIST METALS AND ASSOCIATED EPA WASTE CODES**

Aluminum, Al	Antimony, Sb	Arsenic, As D004
Barium, Ba D005	Beryllium, Be	Cadmium, Cd D006
Cesium, Cs	Chromium, Cr D007	Cobalt, Co
Copper, Cu	Iron, Fe	Lead, Pb D008
Lithium, Li	Magnesium, Mg	Manganese, Mn
Mercury, Hg * D009	Molybdenum, Mo	Nickel, Ni
Potassium, K	Selenium, Se D010	Silicon, Si
Silver, Ag D011	Sodium, Na	Strontium, Sr
Thallium, Tl	Tin, Sn	Vanadium, V
Zinc, zn		

Mercury is not part of the TAL metal list but was added because of its common usage in laboratories.

TABLE 6-2. TARGET COMPOUND LIST OF VOLATILE ORGANIC COMPOUNDS AND ASSOCIATED EPA WASTE CODES

1,1,2,2-Tetrachloroethane	1,1,2-Trichloroethane F002	1,2-Dichloroethene (total)
1,2-Dichloropropane	1-1-1-Trichloroethane F001/F002	1-1-Dichloroethane
1,1-Dichloroethylene D029	1-2-Dichloroethane D028	2-Hexanone
Bromoform	Bromomethane	Carbon disulfide F005
Carbon tetrachloride D019/F001	Chloroethane	Chlorobenzene D021 /F002
Chloroform D022	Chloromethane	cis-1,3-Dichloropropene
Dibromochloromethane	Ethylbenzene F003	Methyl ethyl ketone (butanone) D035 /F005
Methylene chloride F001/F002	Pyridine F005	Styrene
Tetrachloroethylene D039/F001/F002	Toluene F005	trans-1,3-Dichloropropene
Trichloroethylene D040/F001/F002	Vinyl Chloride D043	Xylenes (total) F003
Acetone F003	4-Methyl-2-pentanone	Benzene D018/F005