

Comments for Closure Unit Groups at T-Plant & Central Waste Complex permit modifications

public comment period

1. 211-T Pad Addendum H Closure Plan

Page H.18 *Sample locations after the Settlement Agreement was finalized: seven additional focused soil sample locations, including two guard posts and four concrete cold joints (Figure H-2).*

Response: Seven was the final number of samples agreed upon.

Recommendation: Delete word “additional.”

2. 211-T Pad Addendum H Closure Plan

1. Page H.18 *Sample locations after the Settlement Agreement was finalized: seven additional focused soil sample locations, including two guard posts and four concrete cold joints (Figure H-2). Ecology also identified one focused concrete chip sample for the sump based on professional judgement (Figure H-3). Table H-5 below summarizes the changes to focused soil location samples.*
2. H.31 *Any spill on the 211-T Pad would have drained and collected in the blind sump, therefore a focused soil sample and concrete chip sample are identified.*
3. H.16 *Perform chip sampling of the concrete pad and blind sump (Section H.4.4).*

Response: Per PCHB No. 22-001, Chip sampling is no longer required and was removed from this closure plan.

Recommendation: Remove references to concrete chip sampling throughout and slightly revise the following language:

1. Page H.18 *Sample locations after the Settlement Agreement was finalized: seven additional focused soil sample locations, including two guard posts and four concrete cold joints (Figure H-2). Ecology also identified one focused ~~concrete chip-soil~~ sample ~~for~~ under the sump based on professional judgement (Figure H-3). Table H-5 below summarizes the changes to focused soil location samples:*
2. H.31 *Any spill on the 211-T Pad would have drained and collected in the blind sump, therefore a focused soil sample ~~and concrete chip sample are~~ is identified.*
3. H.16 Remove entire bullet from the list of closure activities.

3. 277-T Building Addendum H Closure Plan

Page H.32 *Field samplers will be collecting grab samples of the soil beneath the concrete floor and sump, and concrete chip samples from the floor and sump for analysis to determine if closure performance standards have been met.*

Response: Per PCHB No. 22-001, Chip sampling is no longer required and was removed from this closure plan.

Recommendation: Remove references to concrete chip sampling throughout and slightly revise the following language:

Page H.32 *Field samplers will be collecting grab samples of the soil beneath the concrete floor and sump, ~~and concrete chip samples from the floor and sump~~ for analysis to determine if closure performance standards have been met.*

4. 277-T Building Addendum H Closure Plan

Page H.20 *Initial sample locations: Ecology and the Permittees performed an additional walk down and inspection of the DWMU in November of 2018. Ecology identified five additional focused soil sample locations, including three low point samples, and two construction joint/seam samples. Ecology also identified one focused concrete chip sample for the sump based on professional judgement.*

Sample locations are identified in Figure H-5. Section H.4.4.1 provides details on the sample design for the focused samples.

Sample locations after the Settlement Agreement was finalized: the sample locations for the focused soils 6 samples are unchanged from the initial locations.

Response: The initial sample locations included a focused concrete chip sample for a total of six samples. The sample locations after the settlement agreement text only addresses the unchanged focused soil samples for a total of five samples.

Recommendation: Include language that addresses the change from a focused concrete chip sample at the sump to a focused soil sample.

Page H.20 *Initial sample locations: Ecology and the Permittees performed an additional walk down and inspection of the DWMU in November of 2018. Ecology identified five additional focused soil sample locations, including three low point samples, and two construction joint/seam samples. Ecology also identified one focused concrete chip sample for the sump based on professional judgement.*

Sample locations are identified in Figure H-5. Section H.4.4.1 provides details on the sample design for the focused samples.

Sample locations after the Settlement Agreement was finalized: the sample locations for the focused soils 6 samples are unchanged from the initial locations, however, the sump location was changed from a concrete chip sample to a soil sample under the sump.

5. 277-T Outdoor Storage Area Addendum H Closure Plan

Page H.36 *Per the visual inspections (Section H.3.2) and Ecology's professional judgment, seven focused soil sample locations are identified for both concrete pads (four for the concrete pad located at the front of the 277-T Building, and three for the concrete pad located at the back of the 277-T Building). One focused soil sample is located at the blow-down line drain (Figure H-7).*

Response: Per PCHB no. 2022-001, two of the four focused samples for the front concrete pad may be removed from sampling upon post penetration test results (thus reducing the count from seven to five).

Recommendation: Include language that two of the four focused samples for the front concrete pad may be removed from sampling upon post penetration test results (thus reducing the count from seven to five). Be consistent with information in Table H-4.

Page H.36 *Per the visual inspections (Section H.3.2) and Ecology's professional judgment, seven focused soil sample locations are identified for both concrete pads (four for the concrete pad located at the front of the 277-T Building, and three for the concrete pad located at the back of the 277-T Building). One focused soil sample is located at the blow-down line drain (Figure H-7). However, there are two locations on the front concrete pad where metal posts appear to penetrate the concrete pad. Tests will be performed to determine if the posts penetrate all the way through the pad. If they do not, documentation will be provided to Ecology and the samples will not be required to be taken. This would reduce the total number of samples taken on the concrete pads to five.*

6. 211-T Pad Addendum H Closure Plan

Page H.15 *211-T Pad Co-Operator: Scott Sax, President and Project Manager*

Response: Scott Sax is no longer the correct contact.

Recommendation: Update 211-T Pad Co-Operator contact to John Eschenberg. Please update for correctness.

7. 271-T Cage Addendum H Closure Plan

Page H.16 *271-T Cage Co-Operator: Scott Sax, President and Project Manager*

Response: Scott Sax is no longer the correct contact.

Recommendation: Update 271-T Cage Co-Operator contact to John Eschenberg. Please update for correctness.

8. 277-T Building Addendum H Closure Plan

Page H.16 *277-T Building Co-Operator: Scott Sax, President and Project Manager*

Response: Scott Sax is no longer the correct contact.

Recommendation: Update 277-T Building Co-Operator contact to John Eschenberg. Please update for correctness.

9. 277-T Outdoor Storage Area Addendum H Closure Plan

Page H.17 *277-T Outdoor Storage Area Co-Operator: Scott Sax, President and Project Manager*

Response: Scott Sax is no longer the correct contact.

Recommendation: Update 277-T Outdoor Storage Area Co-Operator contact to John Eschenberg. Please update for correctness.

10 2401-W Waste Storage Building Addendum H Closure Plan

Page H.16 *2401-W Waste Storage Building Co-Operator: Scott Sax, President and Project Manager*

Response: Scott Sax is no longer the correct contact.

Recommendation: Update 2401-W Waste Storage Building Co-Operator contact to John Eschenberg. Please update for correctness.

11 271-T Cage Addendum H Closure Plan

Page H.10 *Figure H-1 T Plant Complex Overview, 271-T Cage Dangerous Waste Management Unit (Month Unknown, 2017)*

Page H.11 *Figure H-1 T Plant 271-T Cage Outdoor Container Storage Area (May 2017)*

Response: Throughout the closure plan the figures have been renumbered beginning with the original figure H-2 *T Plant 271-T Cage Outdoor Storage Area (May 2017)*. There are now two Figures H-1 in the closure plan.

Recommendation: Revise figure numbers throughout the closure plan.

12 271-T Cage Addendum H Closure Plan

Page H.21 *Decontamination will be performed with the pads isolated from the surrounding area as much as possible.*

Response: There is only one pad at this DWMU.

Recommendation: Change “pads” to “pad” in this sentence.

13 211-T Pad Addendum H Closure Plan

Page H.21 *Closure activities for the concrete pads at the 211-T Pad DWMU will result in waste generated during closure activities, requiring management and disposal.*

Page H.21 *Decontamination will be performed with the pads isolated from the surrounding area as much as possible.*

Response: There is only one pad at this DWMU.

Recommendation: Change “pads” to “pad” in both instances.