



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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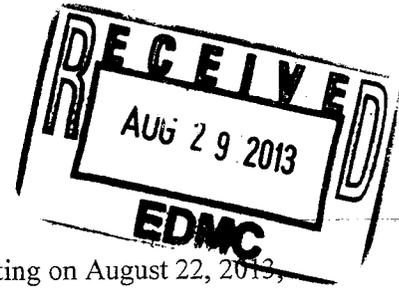
August 28, 2013

13-NWP-094

Mr. Oliver A. Farabee, Project Manager  
United States Department of Energy, Richland Operations Office  
P.O. Box 550, MSIN: A5-11  
Richland, Washington 99352

Re: 618-10 Retrieved Waste Drums Transferred to CWC-WRAP

Dear Mr. Farabee:



At the Solid Waste Operations Complex (SWOC) Project Managers meeting on August 22, 2013, USDOE reported on the retrieval of waste from the 618-10 Burial Ground and future plans to transfer some of the waste to CWC-WRAP. To summarize the information USDOE provided:

- This waste stream will consist of concrete- and lead-lined drums retrieved from 618-10.
- The waste will be assayed at 618-10 using portable equipment to determine the transuranic content of each drum.
- The waste will not be sampled or the containers opened at 618-10.
- The waste will be transferred to CWC-WRAP and temporarily stored in the 2404-WC Building.
- The waste will be managed at CWC-WRAP as TRUM waste.
- The inventory at CWC-WRAP will be limited to 12 drums.
- The drums will be x-rayed at CWC-WRAP using the HERTR to look for free liquids.
- The drums will then be shipped to Perma-Fix for further processing.

Extra precautions will be needed in handling this waste stream, as the historical information about this waste is suspect and visual inspection or sampling is not being planned. Ecology would like to remind USDOE of some requirements from the WAC 173-303, *Dangerous Waste Regulations*, which will apply to the management of the 618-10 waste stream:

- These waste containers must be managed as if they contain unknown free liquids, until it is confirmed otherwise.
- Transportation and packaging of the waste must consider the unknown contents of the drums.
- Secondary containment must be provided for the waste at all times.
- The drums must be elevated to avoid contact with any accumulated liquids within the secondary containment.
- Safeguards for managing potentially ignitable or reactive waste must be addressed.
- Compatibility of the waste with the container materials and other waste in the area must be ensured.
- Daily inspections must be performed of areas where the waste is being managed.

Ecology requests that, approximately 30 days before the first shipment from 618-10 to CWC-WRAP occurs, USDOE provide a safety briefing which addresses these and other measures to protect the environment and human health.

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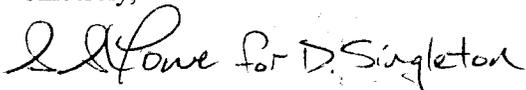
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Ecology also requests that USDOE provide three-days advance notice of the first shipment from 618-10 to CWC-WRAP, so that Ecology staff may witness the field activities.

If you have any questions, please feel free to contact me at [deborahsingleton@ecy.wa.gov](mailto:deborahsingleton@ecy.wa.gov) or (509) 372-7923 or Steven Lowe at [stevenlowe@ecy.wa.gov](mailto:stevenlowe@ecy.wa.gov) or (509) 372-7894.

Sincerely,



Deborah Singleton  
Waste Management Section Project Manager  
Nuclear Waste Program

sl/jvs

cc: Dennis Faulk, EPA  
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