



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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January 25, 1996

Mr. James E. Rasmussen, Director  
U.S. Department of Energy  
Environmental Assurance, Permits and Policy Division  
P.O. Box 550, MSIN: A5-15  
Richland, WA 99352



Dear Mr. Rasmussen:

The Washington State Department of Ecology (Ecology) has reviewed your request and closure certifications submitted in the September 22, 1995 letter, "Modification of the Hanford Facility Dangerous Waste Part A Permit To Address Procedural Closure of the Thermal and Physical/Chemical Treatment Test Facilities."

In response to your request, Ecology staff inspected each of these units and reviewed associated information. It was determined these units were never actually used to treat, store, or dispose of hazardous waste, including mixed waste, except as provided in WAC 173-303-200 or WAC 173-303-802. Ecology approves the request for the modification of the Hanford Facility Dangerous Waste Part A Permit to reflect the procedural closure of the Thermal Treatment Test Facilities (M-20-42A) and the Physical/Chemical Treatment Test Facilities (M-20-43A). These two units are closed in accordance with Section 6.3.3 of the Hanford Federal Facility Agreement and Consent Order.

Ecology's acceptance of the closure certifications releases U. S. Department of Energy (USDOE)/Pacific Northwest Laboratories (PNL) from the interim status and fulfills the closure requirements at these two units. However, the In-situ Vitrification Site (ISV), which is part of the Thermal Treatment Test Facility, will be incorporated into the 300-FF-2 operable unit. Potential pre-existing contamination at the ISV site will be investigated as part of the operable unit. Regarding the other portions of the units, if (at anytime) it is determined acceptance of the closure certifications was made based on false or inaccurate information, the units or portions of the units will become subject to remediation under the Resource Conservation and Recovery Act corrective action, the Model Toxics Control Act, and/or the Comprehensive Environmental Response Compensation, and Liability Act, as applicable.

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The mechanism for withdrawal of Part A, Form 3, will be denial of final status and terminating interim status for these two units. Ecology will prepare a fact sheet and initiate the public comment period. Following the public comment period, Ecology will notify USDOE of the final disposition of the permit. At this time, USDOE is to submit the Form 3's for each of the units stamped "Closed as of this date." This will complete the process for modification of the Hanford Facility Dangerous Waste Part A Permit to reflect closure of these two units.

Should you have any questions or concerns regarding these issues, please contact me at (509) 736-3019.

Sincerely,



Jeanne Wallace  
300 Area Project Manager  
Nuclear Waste Program

JW:skr

cc: Cliff Clark, USDOE  
Bob DeLannoy, USDOE  
Mike Schlender, PNL  
Harold Tilden, PNL  
Kenneth C. Brog, PNL  
Bill Burke, CTUIR  
Doug Sherwood, EPA  
Dave Einan, EPA  
Dennis Faulk, EPA  
Administrative Records: Thermal Treatment Test Facility  
Physical/Chemical Treatment Test Facility  
300-FF-2 Operable Unit ✓