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United States
Environmental Protection
Agency

Region 10
Hanford Project Office
12000 Swift Boulevard, Suite 5
Richland WA 99352

9103784



August 28, 1991



Steven H. Wisness
Hanford Project Manager
Department of Energy
Richland Field Office
P.O. Box 550, A6-95
Richland, Washington 99352

Re: Liquid Effluent Treatment Testing Facility Modifications

Dear Mr. Wisness:

Modifications to the 1706-KE Facility were discussed during the liquid effluent negotiations held in Richland, Washington on August 14-15, 1991. The 1706-KE Facility is the planned location for testing treatment equipment for synthetic and actual 242-A Evaporator Process Condensate in support of the C-018 treatment system. The Department of Energy-Richland Field Office (DOE) has stated that the synthetic process condensate will not be a hazardous/dangerous waste, as defined by the State of Washington Administrative Code (WAC) 173-303. DOE and Westinghouse Hanford have requested a clarification on the Resource Conservation and Recovery Act (RCRA) permitting requirements for the modification of the 1706-KE Facility to test the synthetic process condensate prior to obtaining a Research, Development, and Demonstration (RD&D) permit under 40 CFR § 270.65 for actual 242-A Evaporator Process Condensate treatment testing.

As stated during the negotiations, the U.S. Environmental Protection Agency Region 10 (EPA) does not consider these facility modifications to be subject to RCRA requirements, provided only non-hazardous wastes are tested. As DOE explained to EPA and the Washington State Department of Ecology (Ecology), these modifications are required to support testing of synthetic evaporator process condensate as well as other liquid effluents not subject to RCRA requirements. EPA does require that an RD&D permit be issued prior to receipt or testing of actual 242-A Evaporator Process Condensate at the 1706-KE Facility since Ecology has determined that the actual process condensate is a hazardous/dangerous waste as defined by WAC 173-303.



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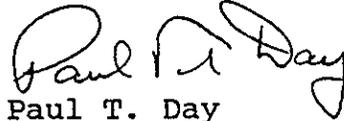
S. H. Wisness

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If you require additional clarifications on this issue, please contact either Dan Duncan, Hanford RCRA Program Manager, at (206) 553-6693, or Doug Sherwood, Senior Remedial Project Manager at (509) 376-9529.

Sincerely,



Paul T. Day
Hanford Project Manager

cc: C. Clark, DOE
D. Duncan, EPA
D. McKenney, WHC
T. Nord, Ecology
P. Stasch, Ecology
T. Veneziano, WHC

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