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Department of Energy

Richland Operations Office
P.O. Box 550
Richland, Washington 99352

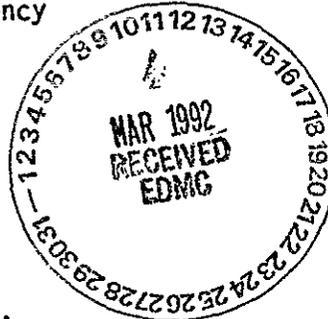
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92-RPB-004

FEB 12 1992

Ms. Dana A. Rasmussen
Regional Administrator
U.S. Environmental Protection Agency
1200 Sixth Avenue
Seattle, Washington 98101

Mr. Chuck Clarke, Director
State of Washington
Department of Ecology
Mail Stop PV-11
Olympia, Washington 98504



Dear Mr. Clarke and Ms. Rasmussen:

HANFORD FACILITY DANGEROUS WASTE PERMIT: REQUEST FOR EXTENSION OF PUBLIC COMMENT PERIOD

The DOE Richland Field Office (RL) hereby requests a 30 day extension of the public comment period on the draft Hanford Facility Dangerous Waste Permit, issued on January 15, 1992, beyond the 45 days specified in the regulations in accordance with WAC 173-303-840(6)(b).

The regulation at WAC 173-303-840(6)(a) requires permit applicants to "... raise all reasonably ascertainable issues and factual grounds supporting their position, including all supporting material, by the close of the public comment period ...". RL believes that the extraordinary length of the draft permit and the complexity of the issues raised therein warrant additional review time and an extended public comment period in order for RL to fulfill its duties under this section of the regulations. RL raised many concerns during the months preceding the issuance of this draft permit. These matters have not yet been fully addressed by the regulatory agencies. For instance, while reviewing the draft permit, RL discovered that some issues on which it was believed that acceptable resolution had been reached with the regulatory agencies were in fact not resolved in the permit. In addition, some new issues have been identified in the draft permit.

Further, the Department of Energy Headquarters has requested an opportunity to review and comment on some of these complex issues, and input from other U.S. Government entities (such as the Department of Justice) may also be required. Soliciting, receiving, and forwarding this input will require more time than the 45 days originally allotted for this process.

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Mr. Clarke and Ms. Rasmussen
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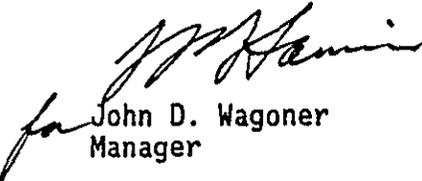
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Finally, RL realizes that there is strong public interest in this permit action. RL welcomes the opportunity for citizens to comment on the draft permit and believes that additional time is necessary to allow members of the public to research the items that are addressed in the draft permit and to be able to comment on them in a timely manner.

If you have any questions regarding our request, please feel free to contact me or Mr. C. E. Clark of RL on (509) 376-9333.

Sincerely,


for John D. Wagoner
Manager

cc: D. B. Jansen, Ecology
R. F. Smith, EPA
P. T. Day, EPA
T. M. Anderson, WHC
R. E. Lerch, WHC
T. B. Veneziano, WHC
H. E. McGuire, WHC
W. R. Wiley, PNL
T. D. Chikalla, PNL
R. T. French, KEH
W. L. Meader, HEHF

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