



Department of Energy  
Richland Operations Office  
P.O. Box 550  
Richland, Washington 99352

*Actually  
sent*

91-EAB-337

OCT 18 1991

Mr. Paul T. Day  
Hanford Project Manager  
U.S. Environmental Protection Agency  
712 Swift Blvd., Suite 5  
Richland, Washington 99352

Mr. Timothy L. Nord  
Hanford Project Manager  
State of Washington  
Department of Ecology  
Mail Stop PV-11  
Olympia, Washington 98504-8711

Dear Messrs. Day and Nord:

UNRESOLVED RESOURCE CONSERVATION AND RECOVERY ACT PERMIT ISSUES

As noted in my letter to you dated September 18, 1991, the DOE Field Office, Richland (RL) is concerned with the slow progress being made on the resolution of several Resource Conservation and Recovery Act permit issues. The 'facility-wide' nature of these issues transcends the scope of individual Treatment, Storage, or Disposal Unit Part 8 Permits and Closure Plans, and, in our opinion, requires resolution before the Permit can be issued. The project managers were briefed on these issues at a meeting held on July 26, 1991, in the U.S. Environmental Protection Agency (EPA) office in Richland, Washington. It was our expectation that informal involvement of the Project Managers would expedite resolution. However, this has not happened.

*in sum*

In the course of eight Unit Manager Hanford Permit Issue Resolution Meetings, commencing in February 1991, 38 facility-wide issues were identified for resolution. The intent was to resolve these issues during the preparation of the Hanford Facility Dangerous Waste Permit Application. Twenty-seven of these issues have been resolved, at least in principle. While it is encouraging that some progress has been made, as it now stands, resolution of these issues will be confirmed only with the issuance of the Permit by Washington State Department of Ecology and EPA. The remaining eleven legal issues directly impact the RL and its contractors with regard to responsibilities and liabilities concerning the management of dangerous waste on the Hanford Facility. To avoid adversely impacting the April 1992 groundbreaking commitment for the Hanford Waste Vitrification Plant, these issues must be resolved as soon as possible.



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Due to the nature of the remaining issues, together with the very limited time remaining, RL proposes that these issues be formally elevated to the Project Managers for resolution. October 23, 1991 has been proposed as a date for a Project Manager Hanford Facility Issues Resolution Meeting in conjunction with the Tri-Party Agreement ~~Monthly Status Meeting~~. Please contact me as soon as possible to confirm your availability for this date. Enclosed is a list, and brief discussions, of the remaining eleven issues.

Sincerely,

*original Signed by*

Steven H. Wisness  
Hanford Project Manager

Enclosure:  
Hanford Facility Permit Issue Papers

cc w/encl:  
Christine Gregoire, Ecology  
Narda Pience, Ecology  
Dana Rasmussen, EPA  
Randy Smith, EPA

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HANFORD FACILITY PERMIT ISSUE PAPERS

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