

86.11.51 /
002-110

START

TO: Cliff Clark

9 March 1993

FROM: Dan Duncan EPA

SUBJECT: Review of Page 4-31, DOE/RL-91-39, REV 1A 12/18/92

The EPA has reviewed page 4-31 of the RD&D Permit Application. The first paragraph is consistent with 40 CFR § 262.34(c)(1) which requires that the accumulation start date must be placed upon a satellite accumulation container upon accumulation of as much as 55 gallons of hazardous waste at or near the point of generation where wastes initially accumulate, under the control of the operator of the process generating the waste. It should be rewritten as follows:

"Contaminated equipment or other secondary waste not returned to the LERF, which is destined for treatment and/or disposal will be placed in U.S. Department of Transportation-compliant containers. The containers will be labeled as necessary and managed in compliance with 40 CFR § 262.34(c)(1) in a satellite accumulation area. When the waste container is filled the waste generation date will be marked on the container and the waste will be moved to a RCRA compliant less-than-90-day storage area and the waste will managed in accordance with all 40 CFR § 262.34 conditions. The waste will be designated. Upon designation of the containerized waste, additional labeling will be placed on the container as necessary and the waste will be transferred to a Hanford Facility TSD unit in accordance with onsite procedures.

Contaminated equipment that is destined for reuse will be stored in an area equipped with secondary containment."

If any additional information is required please contact me on (206) 553-6693.

cc:

- Dean Ingemanson- ORC
- Cathy Massimino- HWD
- Bob King - Ecology
- Toby Michelena - Ecology
- Steve Skurla - WHC
- Jan Fields - WHC

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OPTIONAL FORM 96 (7-80)

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To CLIFF CLARK Dept./Agency	From DAN DUNCAN Phone #
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