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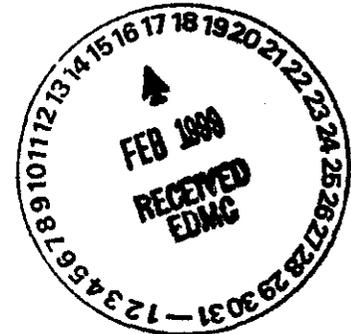
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STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

1315 W. 4th Avenue • Kennewick, Washington 99336-6018 • (509) 735-7581

February 11, 1999

Mr. George H. Sanders, Administrator  
Hanford Tri-Party Agreement  
U.S. Department of Energy  
P.O. Box 550  
Richland, Washington 99352



Dear Mr. Sanders:

Re: Change Control Form M-32-98-01, 219-S Construction Upgrade Schedule Revision,  
Interim Milestone M-32-02

This letter is in response to your letter (99-EAP-140) dated January 28, 1999. Your letter transmitted a Tri-Party Agreement (TPA) Milestone change package to revise interim milestone M-32-02 for the upgrade of the tank system in the 219-S facility.

Washington State Department of Ecology (Ecology) staff have reviewed your letter and change package. In response, we recommended to our Program Manager, Michael Wilson, that he approve the referenced change package. Enclosed is the approved change package signed by Ecology.

Ecology also concurs with your request to delay the final closure of Tank 103 to coincide with the final closure of the 219-S facility. The immediate removal of this tank, as originally required by this milestone, will have adverse impact on the environment and on the critical operation of the 219-S tank system. You are requested to formally inform Ecology of the completion of all field construction activities aimed at isolating Tank 103.

If you have any questions regarding this letter, please contact me at (509) 736-3016, or Ms. Brenda Becker-Khaleel at (509) 736-3003.

Sincerely,

Moses Jaraysi, Waste Management Project Manager  
Nuclear Waste Program

MJ:sb  
Enclosure

cc: Jeff Hertzels, FDH  
Janice Williams, FDH  
John Winterhalder, FDH  
William Adair, DESH  
Michael Cahill, WMH  
Robert Giroir, WMH

Ana Sherwood, WMH  
J.R. Wilkinson, CTUIR  
Donna Powaukee, NPT  
Russell Jim, YIN  
Mary Lou Blazek, OOE  
Administrative Record





**Description/Justification of Change (cont'd)**

Phase II of the 219-S compliance upgrades could not start until the liquid waste inventory in Tanks 101 and 102 was removed. This was scheduled to occur in January 1998. However, resolution of polychlorinated biphenyl (PCB) related issues and preparing for Mega Rule requirements in the January 1998 through August 1998 time frame delayed the waste removal until August 1998. The June 30, 1999 date reflects the revised project completion date.

Completion of this interim milestone will include the removal of Tank 103 from service. The Tank 103 waste inventory will be transferred to another tank. A small residual heel will remain (<1% of tank capacity). Tank 103 will be isolated and the heel allowed to evaporate to dryness. All service piping will be removed and a pressure relief valve installed. RCRA closure of Tank 103 will not take place until RCRA closure of the 219-S Waste Handling Facility

After completion of Project W-178, the 219-S Waste Handling Facility will contain a compliant dangerous waste tank system. The existing 219-S Sample System will not be upgraded. An evaluation of the system has been performed and the system found to be adequate for future use.