



**Department of Energy**  
Office of River Protection  
P.O. Box 550  
Richland, Washington 99352

0051055

JUL 26 1999

99-DPD-044

Ms. Susan Dahl-Crumpler  
State of Washington  
Department of Ecology  
1315 West 4<sup>th</sup> Avenue  
Kennewick, Washington 99336



Dear Ms. Dahl-Crumpler

**IMMOBILIZED HIGH-LEVEL WASTE INTERIM STORAGE UNIT DANGEROUS WASTE PERMIT APPLICATION PART A, FORM 3**

In recent telephone conversations, Ecology staff have questioned why specific dangerous waste numbers/hazardous waste numbers (commonly referred to as waste codes), included in the Part A, Form 3, for the Double Shell Tank System unit were not included in the application for the modification of the Hanford site-wide permit for the Immobilized High-Level Waste Interim Storage Unit, located in the Canister Storage Building. The purpose of this letter is to provide clarification. This information was previously provided to R. J. Julian through electronic mail.

In general, the waste codes identified in Section IV of the Form 3 for the Immobilized High-Level Waste Interim Storage Unit were based on the waste codes for the Double-Shell Tank (DST) numbers. The waste codes for the DST include characteristic waste codes D001 Ignitability and D003 Reactivity. However, the U. S. Department of Energy (DOE) has no plans to manage wastes with these waste codes in the Immobilized High-Level Waste Interim Storage Unit. This was deemed appropriate because the EM Waste Acceptance Product Specifications, Rev 2, Section 1.5 "Hazardous Waste Specification" require that any waste that is shown to have hazardous characteristics (40CFR261.20 -40CFR 261.24), "shall be treated to remove such characteristics." The treated vitrified waste form will not exhibit the characteristics of ignitability or reactivity. Therefore, the Office of River Protection (ORP) does not believe it is appropriate to include D001 and D003 on the Immobilized High-Level Waste Interim Storage Unit Part A, Form 3. The other characteristic and criteria waste codes from the DST Part A, Form 3, have been retained in the Immobilized High-Level Waste Interim Storage Unit Part A, Form 3, as a protective filing measure.

DOE plans on pursuing a petition for exemption or exclusion in accordance with the Resource Conservation and Recovery Act and its implementing regulations, and the Hazardous Waste Management Act and its implementing regulations. The listed waste codes, F001-F005, are anticipated to be applicable until a delisting petition is approved.

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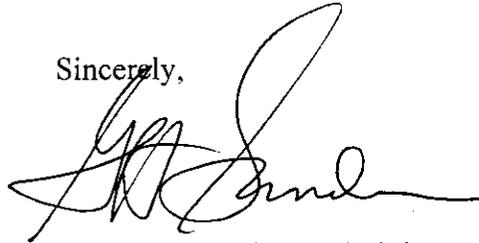
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In addition, listed waste code F039 Multi-Source Leachate is not included in the Part A, Form 3, based on ORP understanding that no such waste has been added to the DST. Further, the management of F039 type of waste is not planned for the Immobilized High-Level Waste Interim Storage Unit. ORP believes carrying this code on the Part A, Form 3, would be inappropriate.

The point-of-contact for this letter is Lori Huffman, Tank Waste Processing and Disposal Program Division, on (509) 376-0104.

Sincerely,



George H. Sanders, Administrator  
Hanford Tri-Party Agreement

DPD:LAH

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Administrative Record, H6-06 ✓