



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

00-EAP-001

OCT 05 1999

Mr. Dennis A. Faulk
U.S. Environmental Protection Agency
712 Swift, Suite 5
Richland, Washington 99352

Dear Mr. Faulk:

REQUEST FOR FORMAL U.S. ENVIRONMENTAL PROTECTION AGENCY (EPA)
APPROVAL OF MINOR DEVIATION FROM THE APPROVED TANK 241-Z-361 WASTE
MANAGEMENT PLAN

This letter formalizes your verbal concurrence that a minor deviation from the approved waste management plan is in the best interest of the project for reasons of efficiency and cost. The deviation is for waste type "Contaminated Compactible Wastes" as defined in Section 2.10.1, page 2-41 of the "241-Z-361 Sludge Characterization Sampling and Analysis Plan," Revision 1, dated July 29, 1999 (HNF-4371). Section 2.10.2 of the subject document describes the approved process. The change involves omission of the steps that begin to be described in the final sentence of page 2-41:

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"After the PFP has completed non-destructive analysis and radioactivity analysis, the waste will be labeled appropriately and returned to the 241-Z-361 temporary waste storage area for interim storage pending disposal. While at the temporary waste storage area, the waste will be placed in the properly designated waste container, as shown in Figure 2-11."

Due to the low volume of waste generated during the core sampling of the tank sludge, efficiency and cost savings were realized by utilizing the standard, approved, Plutonium Finishing Plant (PFP) plant process for waste disposal. Therefore, after the PFP completed non-destructive analysis and radioactivity analysis, the waste was disposed rather than returned to the 241-Z-361 temporary waste storage area for interim storage. In addition, the waste was sent to the Low-Level Burial Grounds rather than the Environmental Restoration Disposal Facility.



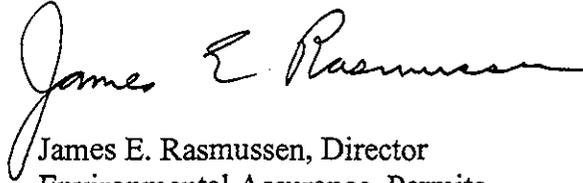
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At your request, we have added a signature block at the bottom of the page. When signed, this document provides evidence of prior verbal EPA approval. Please return a copy of this letter to the U.S. Department of Energy, Richland Operations Office after signed approval by EPA.

Sincerely,



James E. Rasmussen, Director
Environmental Assurance, Permits,
and Policy Division

EAP:SEC

Signature: _____



Dennis A. Faulk, EPA

Date: _____

10-7-99