



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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March 28, 2000

Mr. Keith Klein, Manager
U.S. Department of Energy
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Mr. Ronald Hanson, President & Chief Executive Officer
Fluor Daniel Hanford, Inc.
P.O. Box 1000
Richland, Washington 99352-1000

Mr. Michael C. Hughes, President
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Richland, Washington 99352

Ms. M.P. (Fran) DeLozier, President & General Manager
CH2M HILL Hanford Group, Inc.
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Richland, Washington 99352-1505

Dr. Lura Powell, Laboratory Director
Pacific Northwest National Laboratory
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Richland, Washington 99352

Dear Messrs. Klein, Hanson, and Hughes, Ms. DeLozier, and Dr. Powell:

This letter transmits the *Dangerous Waste Portion of the Hanford Facility Resource Conservation and Recovery Act Permit for the Treatment, Storage, and Disposal of Dangerous Waste* (Permit), Revision 6, transferring corrective action conditions from the federal to the state portion of the Permit. The associated Responsiveness Summary is also enclosed.

Also enclosed is an updated Permit Applicability Matrix (Attachment 3 to the Permit). The Permit Modification Schedule (Attachment 27 to the Permit) has not changed as a result of this

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modification and is therefore not enclosed. Attachment 27 will be updated and reissued with Modification E (Revision 7).

The following is a summary of changes made to the Permit for Revision 6:

Introduction:

- Language was added to reflect the transfer of corrective action conditions from the federal portion to the state portion of the Permit.
- Language was added to reflect the addition of CH2M HILL Hanford Group, Inc. (CHG), as a contractor to the U.S. Department of Energy (USDOE) and co-operator of the Permit.

Definitions:

- Definitions related to corrective action were added.
- Language was added to the definition of "Contractor(s)" to reflect the addition of CHG, as a contractor to USDOE.

Part I. Standard Conditions:

- No changes.

Part II. General Facility Conditions:

- Condition II.O.1.a. was revised to reflect the elimination of the 1100 Area from USDOE ownership.
- Corrective action conditions II.Y were added.

Part III. Unit Specific Conditions for Final Status Operations:

- Chapter 1 (616 Nonradioactive Dangerous Waste Storage Facility) was revised to reflect the deletion of Condition III.1.B.g. per Ecology's June 2, 1999, letter to USDOE (see enclosure 4).
- Chapter 6 (325 Hazardous Waste Treatment Units) was revised to reflect the deletion of the 2-28-2000 closure date within Condition III.6.B.g., per Ecology's June 10, 1999, letter to USDOE (see enclosure 5).

Part IV. Unit-Specific Conditions for Corrective Action:

- Chapter 1 (100-NR-1) and Chapter 2 (100-NR-2) were added. These chapters were revised to correct inaccuracies in the reference of enforceable portions of the approved Corrective Measures Study and Engineering Evaluation/Cost Analysis. The USDOE reviewed and concurred with the corrections.

Part V. Unit-Specific Conditions for Units Undergoing Closure:

- No changes.

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Part VI. Unit-Specific Conditions for Units in Post-Closure:

- Chapter 1 (300 Area Process Trenches) was revised to reflect Class 1 and Class ¹1 changes that were erroneously omitted from Modification D of the Permit, per Ecology's June 10, 1999, letter to USDOE (see enclosure 5).

Attachment 3. Permit Applicability Matrix:

- Corrective action conditions were added to Part II and Part IV.

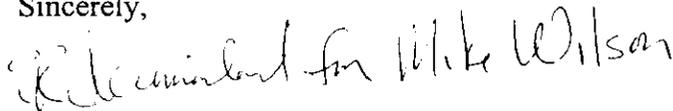
Miscellaneous Changes:

- Several minor changes were made throughout the Permit for grammar and consistency in presentation.
- The list of acronyms, list of attachments, and table of contents were updated.

As discussed recently with Mr. Cliff Clark of your staff, some of the proposed changes that appeared in the public comment package for the corrective action modification included changes proposed for Modification E of the Permit. This is because the proposed Modification E changes were submitted to the public for comment prior to the proposed corrective action changes. As it happened, Ecology is prepared to issue the corrective action modification before Modification E. Consequently, USDOE's Comment #39 regarding the Central Waste Complex and USDOE's Comment #42 regarding the 2401-W Waste Storage Building will be addressed, as appropriate, in the Responsiveness Summary for Modification E.

If you have any questions regarding the above modifications, please contact Laura Ruud at (509) 736-5715.

Sincerely,



Michael Wilson, Manager
Nuclear Waste Program

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Enclosures:

- (1) RCRA Permit, Revision 6
- (2) Permit Applicability Matrix (Attachment 3)
- (3) Corrective Action Responsiveness Summary
- (4) Letter, L. Ruud, Ecology, to James Rasmussen, USDOE, dated June 2, 1999
- (5) Letter, L. Ruud, Ecology, to James Rasmussen, USDOE, dated June 10, 1999

cc w/encl: Dave Bartus, EPA
Doug Sherwood, EPA
Cliff Clark, USDOE
Ellen Mattlin, USDOE
Sue Price, FDH

Suzette Thompson, FDH
Harold Tilden, PNNL
Mary Lou Blazek, OOE
Administrative Record: SWP