



OCT 16 2006

06-ORP-140

Mr. Jay Manning, Director
Washington State
Department of Ecology
P.O. Box 47600
Olympia, Washington 98504

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Dear Mr. Manning:

WASTE TREATMENT AND IMMOBILIZATION PLANT (WTP) DANGEROUS WASTE PERMIT (DWP) COMPLIANCE SCHEDULE ITEMS 26 AND 31

- References:
1. ORP letter from R. J. Schepens and J. P. Henschel, BNI, to J. Hedges, Ecology, "Waste Treatment and Immobilization Plant (WTP) Dangerous Waste Permit Compliance Schedule," 06-WTP-011, dated February 1, 2006.
 2. BNI Meeting Minutes, "WTP Demonstration Test Planning Discussion," CCN-127155, dated August 3, 2005.
 3. BNI Meeting Minutes, "WTP Demonstration Test Plan Development," CCN-127159, dated September 16, 2005.

This letter provides you with notice pursuant to Washington Administrative Code (WAC) 173-303-815(3)(a)(iii) that Compliance Schedule Items 26 and 31, "Submit (Low-Activity Waste) LAW Vitrification Environmental Performance Demonstration Test Plan for Ecology review and approval," and "Submit (High-Level Waste) HLW Vitrification Environmental Performance Demonstration Test Plan for Ecology review and approval," due October 2, 2006, were not completed as scheduled. WAC 173-303-815(3)(a)(iii) requires the permittee to notify the Washington State Department of Ecology (Ecology) Director in writing, no later than 14 days following each compliance date, of its compliance or noncompliance with the requirements.

Compliance Schedule dates for Items 26 and 31 were originally established when the project was scheduled to begin operations in 2007. DWP Conditions III.10.H.5.f and III.10.J.5.f require submittal of Demonstration Test Plans for the Low-Activity Waste Vitrification System and High-Level Waste Vitrification systems 180 days prior to initial receipt of dangerous and/or mixed waste in the WTP Unit.

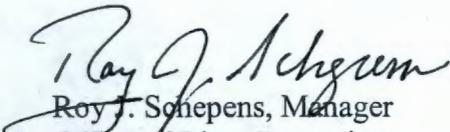
Technical and financial considerations described in Reference 1, will delay completion of this compliance schedule item. Discussions on the revised design and construction schedules in support of Hanford Federal Facility Agreement and Compliance Order (HFFACO) milestone negotiations have been initiated. Revision to the compliance schedule dates will be proposed after HFFACO negotiations are completed.

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The demonstration test plan preparation has progressed and topics discussed in earlier meetings are being addressed (e.g., identification of automatic waste feed cutoffs, operating limits, and a proposal for a single operating condition). The project will informally provide a draft test plan when it is developed. Sharing the draft plan will enable Ecology and the project to begin early discussion of the plan and outstanding items, including:

- Agreement on operating conditions for melter testing;
- Evaluation of results from vendor testing of activated carbon at the Idaho National Laboratory. These tests will be designed to evaluate whether mercury and acid gas (LAW) performance requirements are achieved at the high allyl alcohol and naphthalene spiking rates;
- Determine if carbon bed temperatures can be reduced by improving allyl alcohol detection limits and lowering the required spiking rates, or develop a model to better characterize temperature rise; and
- Permit approvals for off-gas equipment design.

If you have any questions, please contact us, or your staff may contact Lori Huffman, ORP, (509) 376-0104 or Bradley Erlandson, BNI, (509) 371-3826.


Roy J. Schepens, Manager
Office of River Protection


W. S. Elkins, Project Director
Bechtel National, Inc.

ESQ:LAH

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