



Department of Energy

Richland Operations Office
P.O. Box 550
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9003466

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90-WOB-081

JUL 24 1990

Mr. C. E. Findley, Director
U.S. Environmental Protection Agency
1200 Sixth Avenue
Seattle, Washington 98101

Mr. Terry Husseman, Assistant Director
Waste Management Division
State of Washington
Department of Ecology
Mail Stop PV-11
Olympia, Washington 98504-8711

Dear Messrs. Findley and Husseman:

LOW-LEVEL BURIAL GROUNDS DANGEROUS WASTE PERMIT APPLICATION SUPPLEMENT 1:
REQUEST FOR EXEMPTION FROM LINED TRENCH REQUIREMENTS FOR SUBMARINE REACTOR
COMPARTMENTS

Enclosed are copies of the "Request for Exemption from Lined Trench Requirements for Submarine Reactor Compartments (SRCs)" (exemption request). This exemption request is being submitted in fulfillment of a commitment made in Revision 0 of the "Low-Level Burial Grounds (LLBG) Dangerous Waste Permit Application." The exemption request also relates to the March 1990 Compliance Agreement addressing the management and disposal of decommissioned SRCs at the Hanford Site (in Trench 94 of the 218-E-12B Burial Ground).

This exemption request is based on an evaluation that demonstrates that the burial of cathodically protected SRCs, which contain lead and polychlorinated biphenyls (PCBs) as hazardous constituents, results in equivalent or better performance than burial of the SRCs in a landfill meeting minimum technological design requirements for liners and leachate collection and removal systems. This request also demonstrates that burial of the cathodically protected SRCs in Trench 94 is as effective as disposal in a minimum technological design trench in terms of preventing long-term migration of contaminants to groundwater or surface water. Furthermore, modeling results indicate that release of contaminants to groundwater or to the surface water will not occur until after long periods of time (i.e., 65,000 to 650,000 years) and that even after reaching groundwater or surface water, contaminants will not be in excess of current regulatory limits, such as drinking water standards.

The preceeding conclusions are based on technical information supplied by the Puget Sound Naval Shipyard (PSNS) regarding the SRCs; previous hydrogeologic investigations and contaminant transport modeling for the Hanford Site that define recharge rates, groundwater travel times, and contaminant transport properties; evaluations of cover performance conducted



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Dear Messrs. Findley and Husseman

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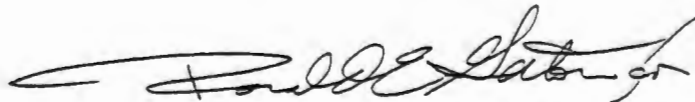
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for preparation of the LLBG Dangerous Waste Permit Application that define infiltration rates; literature reviews of geochemical data that describe important properties affecting the behavior of lead and PCBs in the environment; and field studies to determine the corrosion potential associated with burial of the SRCs at Trench 94.

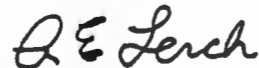
We request that a meeting be held on August 9, 1990, to provide an overview of the contents of the exemption request. At this meeting, we would also like to discuss your plans for reviewing the request. In addition to members of your staff, representatives from the U.S. Department of Energy, Richland Operations Office (DOE-RL), Westinghouse Hanford Company (WHC), and from PSNS will be in attendance. Mr. C. E. Clark of the DOE-RL will be contacting you to finalize arrangements for this meeting.

If you have any questions regarding the exemption request or the August 9, 1990 meeting, please contact Mr. Clark on (509) 376-9333 or Ms. C. J. Geier of WHC on (509) 376-2237.

Sincerely,



Leo E. Little, Assistant Manager
Environmental Management
Richland Operations Office



R. E. Lerch, Manager
Environmental Division
Westinghouse Hanford Company

Enclosure:
Exemption Request

cc w/o encl.:
P. T. Day, EPA
R. E. Lerch, /WHC
T. L. Nord, Ecology

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