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STATE OF WASHINGTON

DEPARTMENT OF ECOLOGY

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May 21, 1992

CERTIFIED MAIL

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Mr. Clifford Clark
Grout Unit Manager
U.S. Department of Energy
P.O. Box 550
Richland, WA 99352

Re: Grout Treatment Facility Dangerous Waste Permit Application, Milestone
M-01-00

Dear Mr. Izatt:

We have received your April 22, 1992, letter informing Ecology and EPA that DOE-RL has "placed on hold" the submittal of a revised Grout Treatment Facility (GTF) Part B Permit Application. Although we appreciate your interest and efforts in resolving facility-wide issues, it is not appropriate to delay unit-specific progress until facility-wide issues are resolved.

Per our letter of January 10, 1991, Ecology initially required a revised permit application to be submitted on April 12, 1991. This date was based upon your own projections as evidenced by your monthly GTF status reports and discussions between our staff. However, based upon your request in a February 6, 1991 letter, we allowed the submittal of "proposed revised text" of the application instead of a certified revision. You then committed to submit a certified revision by May 1, 1992, more than a year after the original expectation. Now, less than one week before it is due, Energy unilaterally decides to postpone this submittal. This short notice allows neither Ecology nor EPA with an opportunity for input.

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Your letter states that most of the notice of deficiency (NOD) comments "which are associated with the GTF issues have been agreed upon; however, there are several NOD's which can not be agreed to in a GTF forum. These are the NOD's associated with the Hanford Site Comments on the Draft Hanford Facility Dangerous Waste Permit..." This statement is inaccurate since the only remaining open issue regarding the GTF addresses hydrogen gas generation within the vaults. We are certain that this issue will be resolved in a GTF forum. Facility-wide issues which will effect the GTF will be settled through the facility-wide permit process, not the GTF process. Should a facility-wide issue conflict with a GTF requirement identified in the permit application, the conflict can be resolved through a facility-wide permit condition.

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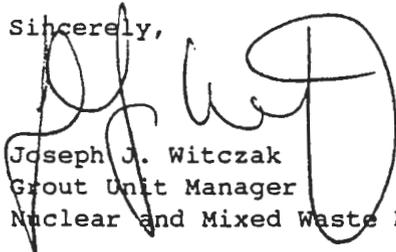
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Therefore, the GTF permit application does not have to be modified, recertified, and resubmitted.

A revised application has not been submitted since January 1990. It is unrealistic for Ecology and EPA staff to continue making regulatory and technical decisions based upon out-of-date information especially in light of the fact that disposal operations are scheduled to begin in late 1992. Also, as you know, Ecology has always intended to initiate public involvement in the grout program, if not issue the final permit, before operations begin. It is for these reasons that a certified, revised application must be resubmitted. Based upon an agreement between Mr. Steve Wisness (Energy's Project Manager) and Mr. Dave Jansen (Ecology's Project Manager), Ecology is requiring the submittal of a revised, certified GTF permit application within 60 days of receipt of this letter.

I appreciate the efforts of your office in regards to handling GTF issues. I hope this same level of effort will continue for this and all future issues. Please contact me with any questions at (206) 438-7557.

Sincerely,



Joseph J. Witczak
Grout Unit Manager
Nuclear and Mixed Waste Management

JW:jb

cc: Dan Duncan - EPA
Sue Price - WHC
T. B. Veneziano - AR
Dave Nylander - Ecology

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Subject: GROUT TREATMENT FACILITY DANGEROUS WASTE PERMIT APPLICATION,
MILESTONE M-01-00

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