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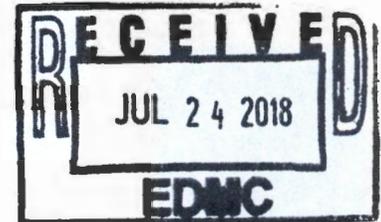
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JUL 18 2018

18-ECD-0048

Ms. Alexandra K. Smith, Program Manager
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Ms. Smith:

IMPLEMENTATION OF THE ANALYTICAL LABORATORY OPERATING PERMIT FOR THE HANFORD SITE WASTE TREATMENT AND IMMOBILIZATION PLANT

Reference: WA7890008967, "Dangerous Waste Portion of the Hanford Facility Resource Conservation and Recovery Act Permit for the Treatment, Storage, and Disposal of Dangerous Waste, Part III, Operating Unit 10, 'Waste Treatment and Immobilization Plant.'"

Washington State Department of Ecology (Ecology) and the Permittees participated in a series of facilitated workshops to determine the design and scope of the Laboratory Operating Permit. This activity was completed in order to have lessons learned that could support development of the Low-Activity Waste Facility Operating permit. This means that the Laboratory Operations Permit was done earlier than needed to support Direct Feel Low-Activity Waste.

The Laboratory Operating Permit was effective on May 5, 2018, however the facility will not be generating or receiving dangerous waste. The Permittees propose that the generator standards outlined in WAC 173-303-200 continue to be followed until the Low-Activity Waste and Effluent Management Facility are permitted to receive dangerous waste as defined under the Reference.

Waste generated during facility commissioning will be managed in accordance with generator standards. The Permittees will notify Ecology 30 days prior to implementing the operating conditions associated with the Waste Treatment and Immobilization Plant Analytical Laboratory. The permittees propose to implement all Analytical Laboratory operating permit conditions (III.10.L, Laboratory Miscellaneous Units) when the Waste Treatment and Immobilization Plant begins receipt of Hanford tank waste. If any commissioning activity is planned which requires parts of the laboratory operating permit to be implemented prior to receipt of Hanford tank waste, U.S. Department of Energy will notify Ecology in writing.

Ms. Alexandra K. Smith
18-ECD-0048

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If you have any questions, please contact Chris Kemp, Director, Environmental Compliance Division, (509) 373-0649, or Roger J. Landon, Environmental Protection Manager, Bechtel National, Inc., (509) 371-2165.


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