



## Department of Energy

Richland Operations Office  
P.O. Box 550  
Richland, Washington 99352

0061813

95-SWT-001

FEB 23 1995

Mr. Chuck Clarke  
Regional Administrator  
U.S. Environmental Protection Agency  
Region 10  
1200 Sixth Avenue  
Seattle, Washington 98101

Ms. Mary Riveland, Director  
State of Washington  
Department of Ecology  
P.O. Box 47600  
Olympia, Washington 98504-7600

RECEIVED  
MAY 20 2004

EDMC

Dear Mr. Clarke and Ms. Riveland:

DRAFT CHANGE REQUEST M-19-94-02: "REVISE M-19 MILESTONES TO ALLOW OPTIONS FOR COMMERCIAL TREATMENT OF SOLID LOW-LEVEL RADIOACTIVE MIXED WASTES"

The subject draft Class I Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) Change Request is being forwarded for your consideration.

The Change Request embodies a proposal to obtain stabilization treatment for certain low-level waste streams from the commercial sector by September 1999. This proposal would include the waste streams presently covered by the M-26 Milestone in the Tri-Party Agreement, and additional waste streams listed in the Site Treatment Plans prepared under the Federal Facility Compliance Act. The proposal also calls for ceasing present WRAP 2A design activities so that limited resources may be conserved.

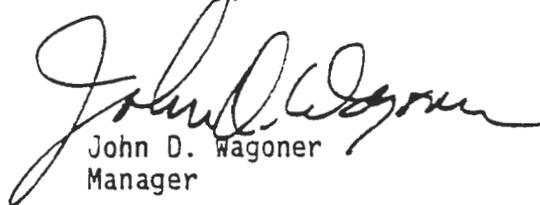
It is the U.S. Department of Energy, Richland Operations Office's (RL) intent to have our contractor issue a Request for Proposal (RFP) for these services which will require that the services be available to initiate treatment by September 1999, so that no change is proposed to the current Tri-Party Agreement Milestone date. However, RL is aware that the critical factor in enabling a prospective offeror to meet this date is the ability to obtain permit coverage for treatment of the waste. To this end, RL is proposing that interim status for the Hanford Facility under the State Dangerous Waste Regulations be extended to cover the construction of a commercial facility on the Hanford Site if such was the most favorable proposal. Additionally, in the RFP, RL would offer the use of the WRAP 2A design documents that have already been prepared. These two actions should enhance the potential for receiving viable responses from the commercial sector.

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RL is also looking at other alternative treatment options for the waste streams originally slated for WRAP 2A. RL has initiated the formation of a team to look at waste streams that could be disposed in compliance with applicable regulations without any additional treatment. This team will evaluate the waste streams for any environmental impacts that would result from direct disposal of the waste. The goal of this team is to reduce cost while still adhering to good environmental practices. Each mixed waste stream selected for direct disposal would require your agencies approval prior to implementation. In addition, RL is reviewing site facilities already in place that may be able to provide stabilization for certain mixed waste streams. DOE would appreciate any thoughts you might have on any other alternatives that will achieve our above goal.

If you or your staff have questions, please contact me, or June M. Hennig, of the Waste Programs Division, on (509) 376-1366.

Sincerely,



John D. Wagoner  
Manager

WPD:DWC

Enclosure:  
Federal Facility Agreement and  
Consent Order Change Control Form

cc w/encl:  
L. Arnold, WHC  
W. Hamilton, Jr., WHC  
M. Jaraysi, Ecology  
M. McLaughlin, WHC  
D. Sherwood, EPA  
R. Stanley, Ecology  
J. Wallace, Ecology

Change Number M-19-94-02	<b>Federal Facility Agreement and Consent Order          Change Control Form</b> <small>Do not use blue ink. Type or print using black ink.</small>	Date December 30, 1994
Originator T. M. Greaser		Phone (509) 376-4344
Class of Change <input checked="" type="checkbox"/> I - Signatories <input type="checkbox"/> II - Project Manager <input type="checkbox"/> III - Unit Manager		
Change Title      Revise M-19 Milestones to Allow for Commercial Treatment of Solid Low Level Radioactive Mixed Wastes		
Description/Justification of Change <p>The current M-19 milestones are as follows:</p> <p>M-19-00      Complete WRAP Module II Construction and Initiate Operations      9/30/1999</p> <p style="padding-left: 40px;">The WRAP Module II will include waste treatment capabilities to minimize land disposal of low-level radioactive waste and radioactive mixed waste. The September 1999 completion date of WRAP Module II is critical to achieving compliance for the management of wastes that are prohibited from land disposal and extended storage. WRAP Module 2 will provide for treatment of secondary solid waste resulting from treated effluent disposal systems.</p> <p>M-19-01      Complete WRAP Module II Construction      9/30/1998</p> <p style="text-align: right;">(Continued on next page)</p>		
Impact of Change <p>This change will allow for the commercialization of waste treatment capabilities which were to be provided by WRAP Module II.</p>		
Affected Documents <p>Hanford Federal Facility Agreement and Consent Order, Fourth Amendment, January 1994, Appendix D (Table D, pages D-41 and D-42, and Action Plan Work Schedule, page 13 of 40)</p>		
Approvals  _____      _____      ___ Approved      ___ Disapproved DOE                                  Date  _____      _____      ___ Approved      ___ Disapproved EPA                                      Date  _____      _____      ___ Approved      ___ Disapproved Ecology                                  Date		

Description/Justification of Change (continued)

The revised M-19 milestones are to be replaced as follows:

M-19-00      Initiate Treatment of Low Level Radioactive  
Mixed Wastes

9/30/1999

Initiate stabilization treatment services for low level mixed waste by a vendor operating under applicable laws.