



START

0037390

Incoming 9400487

Department of Energy

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

94-RPS-257

JUN 28 1994

Mr. David L. Lundstrom
Nuclear Waste Program
State of Washington
Department of Ecology
P.O. Box 1386, MSIN N1-05
Richland, Washington 99352

Mr. Douglas R. Sherwood
Hanford Project Manager
U.S. Environmental Protection Agency
Region 10
712 Swift Boulevard, Suite 5
Richland, Washington 99352

Dear Messrs. Lundstrom and Sherwood:

REQUEST FOR DEFERRAL OF SUBMITTAL OF THE HANFORD FACILITY DANGEROUS WASTE PERMIT APPLICATION DOCUMENTATION, FOR THE 222-S LABORATORY COMPLEX, REVISION 1 (TSD: TS-2-1)

The U.S. Department of Energy, Richland Operations Office (RL) requests that submittal of the Hanford Facility Dangerous Waste Permit Application (Part B) documentation, for the 222-S Laboratory Complex (222-S), Revision 1, be deferred until March 29, 1996. Currently, the 222-S Part B, Revision 1, is due to the State of Washington Department of Ecology (Ecology) and the U.S. Environmental Protection Agency (EPA) on August 31, 1994. The 222-S Part B, Revision 0, was submitted to Ecology and the EPA on December 21, 1991, in accordance with the Hanford Federal Facility Agreement and Consent Order Milestone M-20-22.

On June 15, 1993, a letter was transmitted to Ecology and the EPA requesting a deferral of submittal of the 222-S Part B, Revision 1, to January 31, 1996. This request was based on the schedule for development of four projects that will upgrade the 222-S to be in compliance with the Washington Administrative Code Dangerous Waste Regulations. 29140

On July 21, 1993, a letter was received from Ecology (Mr. Gary Anderson) granting an extension of 180 days for submittal of Revision 1 from February 3, 1994 to August 31, 1994. At the September 29, 1993, 222-S Unit Managers' Meeting, a request was made to Mr. Anderson that he consider changing the Revision 1 submittal date from August 31, 1994 to January 31, 1996. Mr. Anderson stated that he would contact the Richland Ecology Office to request a ruling from them whether a deferral was in order. To date, this issue has not been resolved, and Mr. Anderson has since been reassigned. At the present time, an Ecology Unit Manager has not been assigned to the 222-S. 29884
36197

9413278.1434



JUN 28 1994

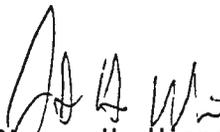
Messrs. Lundstrom and Sherwood -2-
94-RPS-257

RL, Westinghouse Hanford Company (WHC), and Pacific Northwest Laboratory are currently negotiating with Ecology on a Hanford Facility Permit Modification Schedule. The proposed modification schedule shows that the 222-S Part B, Revision 1, is scheduled to be submitted on March 29, 1996, in preparation for incorporation into the Hanford Facility Permit on August 13, 1998.

Deferral of the 222-S Part B, Revision 1, submittal would eliminate repetitive notice of deficiency cycles, would reduce the number of revisions of the Part B, and would reduce overall costs. Therefore, based on the scheduled project upgrades, the proposed Hanford Facility Permit Modification Schedule, and the cost savings involved, we request a deferral for submittal of the 222-S Part B, Revision 1, to March 29, 1996.

Should you have any questions regarding this request for deferral of the submittal of the 222-S Part B, Revision 1, please contact Mr. C. E. Clark of RL on (509) 376-9333 or Ms. S. M. Price of WHC on (509) 376-1653.

Sincerely,



Steven H. Wisness, Acting Program Manager
Office of Environmental Assurance,
Permits, and Policy

EAP:CEC

cc: Administrative Records, H6-08
R. C. Bowman, WHC
W. T. Dixon, WHC
D. L. Duncan, EPA
M. N. Jaraysi, Ecology
S. M. Price, WHC
R. F. Stanley, Ecology

9413279.435

CORRESPONDENCE DISTRIBUTION COVERSHEET

Author	Addressee	Correspondence No.
S. H. Wisness, RL W. T. Dixon, WHC (J. F. Williams Jr., WHC)	D. L. Lundstrom, Ecology D. R. Sherwood, EPA	Incoming 9400487 Xref 9453649D

Subject: REQUEST FOR DEFERRAL OF SUBMITTAL OF THE HANFORD FACILITY DANGEROUS WASTE PERMIT APPLICATION DOCUMENTATION, FOR THE 222-S LABORATORY COMPLEX, REVISION 1 (TSD: TS-2-1)

INTERNAL DISTRIBUTION

Approval	Date	Name	Location	w/att
		Correspondence Control	A3-01	
		L. D. Arnold	B2-35	
		M. L. Bell	T6-16	
		R. C. Bowman	H6-24	
		D. J. Carrell	H6-22	
		W. T. Dixon, Assignee	H6-21	
		E. M. Greager	L6-30	
		L. D. Goodwin	T6-12	
		M. J. Hall	T6-07	
		W. D. Leggett, III	T6-07	
		J. R. Laws	H6-23	
		P. J. Mackey	B3-15	
		H. E. McGuire, Sr. Staff	B3-63	
		S. M. Price	H6-23	
		F. A. Ruck, III	H6-23	
		G. J. Warwick	T6-12	
		J. F. Williams Jr.	H6-24	
		EPIC	H6-08	
		RCRA File/GHL	H6-23	
		JFW File/LB	H6-24	

9453278.1436