



# START

## Department of Energy

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P.O. Box 550  
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JAN 27 1994

94-RPS-103

Mr. David B. Jansen, P.E.  
Hanford Program Manager  
State of Washington  
Department of Ecology  
P.O. Box 47600  
Olympia, Washington 98504-7600

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



Dear Messrs. Jansen and Sherwood:

REQUEST FOR DEFERRAL OF SUBMITTAL OF THE HANFORD FACILITY DANGEROUS WASTE PERMIT APPLICATION DOCUMENTATION, FOR THE CENTRAL WASTE COMPLEX, REVISION 1, AND WASTE RECEIVING AND PROCESSING, REVISION 1 (TSD: TS-2-4)

The U.S. Department of Energy, Richland Operations Office (RL) requests that the submittal of Hanford Facility Dangerous Waste Permit Application documentation, for the Central Waste Complex (CWC) Part B, Revision 1, and Waste Receiving and Processing (WRAP) Part B, Revision 1, be deferred until December 31, 1994. This letter is in response to an action item assigned to the RL and the Westinghouse Hanford Company (WHC) at a December 8, 1993 Unit Managers' Meeting.

Both the CWC, Revision 0, and WRAP Part B, Revision 0, documents were submitted to the State of Washington Department of Ecology (Ecology) on October 31, 1991, in accordance with the Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) Milestone M-20-05 and M-20-12, respectively. Currently, revisions of the CWC and WRAP Part Bs are due to Ecology and the U.S. Environmental Protection Agency (EPA) on March 31, 1994. This submittal date does not coincide with the initial issuance of the Hanford Facility Dangerous Waste Permit. The Hanford Facility Dangerous Waste Permit is scheduled to begin public review sometime early in calendar year 1994. Hanford facility-wide issues should be resolved before submittal of any revised unit-specific Part B permit application documentation to Ecology and the EPA. In addition, comments received from Ecology and the EPA on the 616 Nonradioactive Dangerous Waste Storage Facility Waste Analysis Plan will have a direct impact on how waste analysis plans for the CWC and WRAP Part B permit applications documentation will be written. Because of the complexity of the comments and the Hanford facility-wide impacts, an expanded effort will be required to prepare waste analysis plans for the CWC and WRAP Part Bs. Waste analysis plans for the CWC and WRAP are expected to be completed by September 30, 1994.

Messrs. Jansen and Sherwood -2-  
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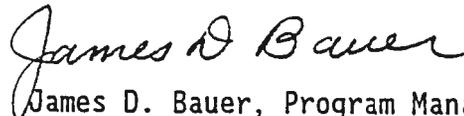
JAN 27 1994

On December 16, 1993, a teleconference was held with Mr. M. N. Jaraysi of Ecology to discuss a new method of submitting revisions of the CWC and WRAP Part Bs. Mr. Jaraysi agreed that the March 31, 1994, submittal date for the revision of the CWC and WRAP Part Bs is untimely and should be changed. A preferred approach for submitting the CWC and WRAP Part B is to begin monthly working meetings with the Ecology Unit Managers and the appropriate RL and WHC personnel. These monthly working meetings should begin in May 1994. This approach would eliminate repetitive notice of deficiency cycles (NOD), would reduce the number of revisions of Part B permit applications, and would reduce overall costs.

Therefore, it is requested that an extension be granted for the revision of the CWC and WRAP Part Bs, changing the due date from March 31, 1994, to December 31, 1994. This extension should provide enough time to incorporate NODs and provide an acceptable waste analysis plan. Also, Hanford facility-wide issues should be resolved by December 1994, and could be incorporated into the revisions of the CWC and WRAP Part Bs.

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

Sincerely,



James D. Bauer, Program Manager  
Office of Environmental Assurance,  
Permits, and Policy  
DOE Richland Operations Office

RPS:CEC



R. E. Lerch, Deputy Director  
Restoration and Remediation  
Westinghouse Hanford Company

cc:  
Administrative Records, H6-08  
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D. Duncan, EPA  
M. Jaraysi, Ecology  
R. Lerch, WHC  
D. Nylander, Ecology  
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C. Ruud, Ecology  
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Subject: REQUEST FOR DEFERRAL OF SUBMITTAL OF THE HANFORD FACILITY DANGEROUS WASTE PERMIT APPLICATION DOCUMENTATION, FOR THE CENTRAL WASTE COMPLEX, REVISION 1, AND WASTE RECEIVING AND PROCESSING, REVISION 1  
(TSD: TS-2-4)

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