



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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June 11, 1998

Mr. James Rasmussen  
U.S. Department of Energy  
P. O. Box 550, MSIN: A5-15  
Richland, WA 99352



Dear Mr. Rasmussen:

Re: Management of Organic/Carbonaceous (O/C) Wastes, per the State Land Disposal Restrictions (LDR), at the Hanford Site.

The Washington State Department of Ecology (Ecology) staff have reviewed the information in your letter, dated March 19, 1998, regarding the existing and projected volumes of O/C waste in the various waste generation streams on the Hanford Site. This information was requested of you through our letter dated October 20, 1997, to enable Ecology to understand the overall scope of this issue.

It is Ecology's determination that a permanent exemption from the O/C waste LDR requirements in the Washington Administrative Code (WAC) 173-303-140(4)(d) can not be granted to the U.S. Department of Energy (USDOE) Hanford site generators. It is also determined that Ecology will consider the approval of a petition submitted by USDOE for the exemption from the aforementioned requirement for a limited period of time not to exceed December 31, 1999, if submitted and processed in accordance with the petition procedures stated in WAC 173-303-910(6). USDOE is to comply with the O/C LDR requirements until a petition is approved by Ecology for the exemption from these requirements. Upon receipt of this petition, Ecology may grant a temporary exemption as per WAC-173-303-910(6)(m), until a final determination is made after the appropriate public involvement requirements are met.

This determination was based on the following information and facts:

1. The main concern and consideration taken into account is the feasibility of segregating the O/C waste at the point of generation and the risk of exposure of the workers during such an operation. This risk may increase during the management of radioactive dangerous waste (mixed waste).
2. Based on a previous state LDR exemption petition, it has been established that permitted recycling and treatment facilities that can receive this "mixed waste" are not available within the specified distance of 1000 miles from the state borders, as per the requirement in WAC 173-303-140(6)(c)(ii)(B).
3. Despite the presence of a USDOE incinerator at the Idaho Engineering and Environmental Laboratory, the availability of this incinerator to treat the O/C wastes generated at Hanford may be very limited, due to the waste packaging, dose rate, and scope of hazardous constituents criteria.
4. It is anticipated that by the end of calendar year 1999, physical and thermal treatment may be permitted and available to receive Hanford O/C wastes. Although this capability can not be presumed to be available by December 1999, it is prudent to consider its availability while evaluating

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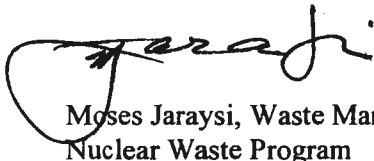
the exemption petition. If by December 1999 the needed thermal treatment capability is still not available for the treatment of the Hanford O/C waste, the exemption, if granted, will remain effective for all the identified waste streams except for those that Ecology may require further treatment on (macroencapsulation, cementation, etc. ) This will be highlighted in the approval of the petition, if granted, as a condition per WAC 173-303-910(6)(h)).

5. Granting a temporary exemption from the O/C waste LDR requirements should allow USDOE and their contractors to develop effective segregation processes while the present and planned cleanup activities of the near future are not adversely impacted.
6. USDOE must encourage all the waste generators on the Hanford Site to segregate organic carbonaceous wastes at the points of generation not only to meet the state LDR requirements, but also to minimize the waste volume generation during the cleanup operations.

This correspondence is not an approval of an exemption from any dangerous waste provisions. USDOE needs to submit a petition in accordance with the appropriate regulations before Ecology can consider whether to exempt any waste from LDR prohibitions.

If you have any questions regarding any of the above determinations or information, please contact me at (509) 736-3016.

Sincerely,



Moses Jaraysi, Waste Management Team Leader  
Nuclear Waste Program

MJ:ch

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