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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

7601 W. Clearwater, Suite 102 • Kennewick, Washington 99336 • (509) 546-2990

April 6, 1994

Mr. James D. Bauer
Office of Environmental Assurance,
Permits, and Policy
U.S. Department of Energy
P.O. Box 550
Richland, WA 99352

Mr. R. E. Lerch
Restoration and Remediation
Westinghouse Hanford Company
P.O. Box 1970
Richland, WA 99352



Dear Messrs. Bauer and Lerch:

Re: Hanford Facility Dangerous Waste Part A Permit Application Form 3,
Revision 4, for the 216-B-3 Main Pond/216-B-3-3 Ditch (TSD: D-2-5)

This letter is in response to the letter dated December 16, 1993, ⁻³³⁶⁹⁹submitting the Hanford Facility Dangerous Waste Part A Permit Application Form 3, Revision 4, for the 216-B-3 Main Pond. Two Form 3's were submitted simultaneously, but separately, for the 216-B-3 Main Pond and the 216-B-3 Expansion Ponds with separate cover letters. Response has been delayed due to the omission of myself, Ecology Unit Manager, (as defined by the TPA) from the cc list of the letter addressing the Main Pond Form 3. The omission was brought to light during a Unit Manager Meeting held on March 15, 1994, at which the Form 3 was transmitted at my request for a follow up on its disposition. Due to the oversight, I notified my U.S. Department of Energy (USDOE) and Westinghouse Hanford Company (WHC) counterparts that I would respond within 60 days from the date of the meeting.

Ecology approves the division of the 216-B-3 Pond System into two distinct TSD Units, each with a separate Part A, Form 3. However, the Form 3, Rev. 4, specifically page 6 of 7, for the Main Pond does not correctly identify the boundary of the unit. The Form 3 must be revised to include the 216-B-3-3 ditch and the commonly referred to "overflow area" at the west of the main pond, which was stabilized in 1985. Inclusion of the ditch

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would make the figure consistent with the narrative description provided on page 2 of 7 of the Form 3, and with that provided in both the Expansion Ponds closure plan, Rev 1, and the original 216-B-3 Pond System closure/postclosure plan, Rev 0.

The requirement to include the omitted areas has been questioned by USDOE and WHC. In an effort to clarify the need to include the ditch and overflow area in the Part A, Form 3, for your reference, I am providing a list of definitions obtained from the Dangerous Waste regulations, Washington Administrative Code (WAC 173-303-040); ancillary equipment, active portion, active life, dangerous waste management unit, facility, existing treatment, storage, and disposal, treatment, and treatment zone. Also please note, the Hanford Federal Facility Agreement and Consent Order (Sept 1992), Appendix B, page B-3, clearly lists the 216-B-3-3 ditch as part of the 216-B-3 Pond System.

If you have any questions feel free to call me at (509) 736-3019.

Sincerely,

Jeanne J. Wallace

Jeanne Wallace, B Pond Unit Manager
Nuclear Waste Program

JW:sr
Enclosures

cc: Cliff Clark, USDOE
Roger Bowman, WHC
Sue Price, WHC
Dan Duncan, EPA
Administrative Records:
216-B-3 Expansion Ponds
216-B-3 Main Pond/200-BP-11 Operable Unit

297-0729-16

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J. Wallace, Ecology	J. D. Bauer, RL R. E. Lerch, WHC	Incoming 9402910

Subject: HANFORD FACILITY DANGEROUS WASTE PART A PERMIT APPLICATION FORM 3, REVISION 4, FOR THE 216-B-3 MAIN POND/216-B-3-3 DITCH (TSD: D-2-5)

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There are no enclosures. It is a typographical error. Per cc: mail, dated 4/15/94, from Randy Krekel.

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