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 Department of Ecology
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Mr. George C. Hofer, Chief
 Federal Facilities Branch
 U.S. Environmental Protection Agency
 Region 10
 1200 Sixth Avenue
 Seattle, Washington 98101

Dear Ms. Butler and Mr. Hofer:

CLOSURE SCHEDULE IN THE LOW-LEVEL BURIAL GROUNDS DANGEROUS WASTE PERMIT APPLICATION (DOE/RL 88-20)

6214.

As you are aware, the mission of Hanford has changed from production of materials for nuclear weapons to environmental remediation and clean up since the Low Level Burial Grounds (LLBG) permit application documents were prepared and submitted. This mission change, in combination with other changes to meet regulatory requirements, has resulted in significant modifications to the waste forecasts for wastes destined for disposal in the LLBG. It has also resulted in changes in other operations in areas adjacent to the LLBG. Due to numerous issues and uncertainties caused by the above mentioned changes, the closure schedule presented on Table 11-2 of the LLBG Dangerous Waste Permit Application, submitted in December 1989, no longer represents a logical approach to completion of the LLBG mission. Therefore the U.S. Department of Energy, Richland Operations Office (RL) and the Westinghouse Hanford Company (WHC) are withdrawing that schedule from the permit application.

Upon evaluating the effect of these changes to our operations, we have come to realize that numerous issues must be resolved before a revised schedule for closure can be proposed. Thus, we can not commit to an alternative schedule for closure of the LLBG at this time. We are, however, continuing planning efforts for closure.



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The major issues which we must address are listed below:

1. Waste Forecasts

The closure schedule presented in the Permit Application was based on the waste forecast as shown in Table 2-1. At that time, it was not anticipated that remediation waste would be received for disposal. Currently, remediation waste is being considered for disposal at the LLBG. In addition, other Hanford Operations, such as PUREX, are in the process of being closed and are not generating waste as originally forecast. Consequently, the LLBG disposal capacity is not being used as previously predicted.

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Additionally, the disposal needs for the Department of Energy's surplus facility decontamination and decommissioning (D&D) program are not fully established. This program could result in the generation of large quantities of waste that will need to be disposed. Thus, RL does not consider closure of unused disposal capacity in the LLBG to be prudent or cost-effective in view of the potential need for capacity to handle the D&D waste disposal.

2. Operational Impacts

Closure caps will extend over railroad spurs, roads, and other utility lines. These features will have to be relocated, removed or abandoned before final closure can be achieved. The impacts to operations have to be considered before closure can be completed.

3. Interface With CERCLA Sites

Closure caps for several of the burial grounds will overlap CERCLA sites, for which a final, approved remediation strategy is yet to be developed. Placement of closure caps over these burial grounds before remediation can be coordinated will interfere with future remediation efforts.

4. Transuranic (TRU) Waste Retrieval

The TRU waste retrieval schedule is subject to changes which at this time can not be anticipated. TRU retrieval must be completed before final closure of burial grounds 218-W-3A, 218-W-4B, 218-W-4C, and 218-E-12B can be completed. While the schedule shown in the permit application (Table 11-2) can not be achieved, we are fully committed to retrieving TRU wastes as described in the Final Environmental Impact Statement to support the Waste Isolation Pilot Plant final closure. Currently, RL cannot begin shipping to WIPP until the end of 1999, at the earliest. While RL is committed to providing optimum protection for the public, workers, and environment, we also advocate a closure strategy which facilitates efficient use of the LLBG disposal facilities.

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In light of Hanford's change in mission and changes in cleanup priorities, revisions to the LLBG closure schedule are necessary to facilitate remediation activities and disposal of remediation generated waste. With this correspondence, we seek to initiate dialogue with Ecology to discuss our management strategy for the LLBG.

If you have any questions concerning this subject, please contact Mr. C. E. Clark of my staff on (509) 376-9333.

Sincerely,

Robert G. Holt

Robert G. Holt, Acting Program Manager
Office of Environmental Assurance,
Permits, and Policy

EAP:CEC

cc: R. Cordts, Ecology
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