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Department of Energy

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Mr. Paul T. Day
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Region 10
712 Swift Boulevard, Suite 5
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Mr. Timothy L. Nord
Hanford Project Manager
State of Washington
Department of Ecology
Mail Stop PV-11
Olympia, Washington 98504



Dear Messrs. Day and Nord:

HANFORD SITE COMPLIANCE WITH THE TOXIC CHARACTERISTIC LEACHING PROCEDURE

Reference: U.S. Environmental Protection Agency Final Rule,
Federal Register, Volume 55, pages 11799-11877,
dated March 29, 1990.

The purpose of this letter is to inform you of Hanford Site compliance issues associated with the impending regulatory requirements of the Toxic Characteristic Leaching Procedure (TCLP).

The referenced final rule will require the Hanford Site to comply with the TCLP by the effective date of regulation, September 25, 1990. The rule requires that generators assess their waste with regard to the new Toxic Characteristic (TC) constituents and to discontinue disposal of these wastes in nonpermitted units prior to the effective date. The rule also requires that all treatment, storage, and disposal units managing newly identified TC waste have amended Part A Permit Applications submitted to the U.S. Environmental Protection Agency and the State of Washington Department of Ecology (Ecology) prior to the effective date.

After TCLP publication, it was determined that the Hanford Site would not have the capability to run the full TC constituent analyses until sometime after the effective date of regulation for both radioactive mixed and

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nonradioactive hazardous waste. Various contingencies have been investigated. Offsite sources have been, and are being procured to provide TCLP analysis until the development of adequate onsite capability has been achieved. The enclosure summarizes the current schedule for obtaining onsite and offsite analytical sources.

The Nonradioactive Dangerous Waste Landfill and the 616 Nonradioactive Dangerous Waste Storage Facility Part A Permit Applications have been revised to include applicable TCLP waste codes and have been submitted to you. The 241-Z Treatment Tank, the Transuranic Waste Storage and Assay Facility, and the Central Waste Complex Part A Permit Applications are in the process of revision based on current knowledge.

Due to the ongoing TC designation efforts onsite, there is a potential that not all wastes will be designated for the newly identified TC constituents by September 25, 1990. Therefore, it is possible that some Part A Permit Applications will need to be amended after this date due to a lack of TC designation information. If and when it is determined that an additional Part A needs to be revised, the revision will be submitted to you within 90 days of the identification of the TC waste.

Prior to TC waste identification, undesignated stored wastes will be managed as allowed by the Ecology Technical Information Memorandum, Number 82-5, dated August 2, 1982, that states, "The onsite storage time clock will start at the time that the generator has adequate knowledge to designate his waste as a dangerous waste."

Existing liquid effluent data from the 33 Stream-Specific Reports has been reviewed with regard to TC designation. Based on this data, none of the liquid waste streams being disposed of to the Hanford soil column are TC regulated. Also, Site personnel have been informed of the new rule and have been advised that any waste that may have a potential for containing TC constituents must be analyzed and designated prior to disposal.

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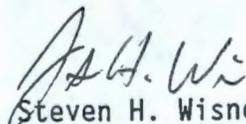
Messrs. Day and Nord

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90-PPB-207
SEP 24 1990

If you have any questions or concerns regarding this information, please contact Mr. Robert G. Holt, Department of Energy-Richland Operations Office, on (509) 376-9989, or Mr. Roger J. Landon, Westinghouse Hanford Company, on (509) 376-6992.

Sincerely,


Steven H. Wisness
Hanford Project Manager
Richland Operations Office

ERD:RGH

Enclosure:
Toxicity Characteristic Leaching
Procedure Compliance

cc w/encl:
R. E. Lerch, WHC

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SCHEDULE FOR OBTAINING FULL HANFORD SITE ANALYTICAL CAPABILITY FOR TOXIC CHARACTERISTIC LEACHING PROCEDURE (TCLP)

ONSITE ANALYSIS

Nonradioactive wastes	2 - 6 months*
Radioactive wastes	
<100 milliroentgen/hour (mR/hr)	2 - 6 months*
>100 mR/hr (hot cell)	
inorganic, semivolatile organic	2 - 6 month*
volatile organic	6 - ? months**

* Initial onsite capacity will be for inorganic components. As organic analysis capability becomes available at 222-S and 325 Laboratories, organic components will be added. Analysis performed in hot cells will likely be on reduced sample sizes - similar to single shell tank extraction procedure toxicity performed earlier this year.

** The schedule for development of volatile organic TCLP analysis for samples requiring hot cell handling is in preparation. Currently identified zero headspace equipment is not suitable for routine use in a hot cell. Alternatives or modifications are being investigated.

OFFSITE ANALYSIS

* Nonradioactive or radioactive wastes Limited throughput available currently at Oak Ridge National Laboratory (<1 mR/hr)

* Capability of offsite commercial laboratories to receive and process radioactive material greater than 10 mR/hr is not expected.

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