



**Department of Energy**

Richland Operations Office  
P.O. Box 550  
Richland, Washington 99352

*INCOMING  
LETTER 8801059*

*0007660*

APR 01 1988



Mr. M. Horton  
State of Washington  
Department of Ecology  
Olympia, Washington 98504-877

Dear Mr. Horton:

**REQUEST FOR CONCURRENCE ON THE HANFORD WASTE VITRIFICATION  
PLANT PERMITTING STRATEGY**

This letter is to request your concurrence with our understanding of the Washington Dangerous Waste and Resource Conservation and Recovery Act (RCRA) regulations as they apply to the permitting of the Hanford Waste Vitrification Plant (HWVP).

In December 1987 the U. S. Department of Energy (DOE) issued its Final Environmental Impact Statement (FEIS) on "Disposal of Hanford Defense High-Level, Transuranic and Tank Wastes" DOE/EIS-0113. This FEIS provided environmental input into the selection and implementation of final disposal actions for high-level, transuranic (TRU) and tank wastes located at the Hanford Site, Richland, Washington and into the construction, operation, and decommissioning of waste treatment facilities that will be required in implementing waste disposal alternatives. The HWVP is one of the critical waste treatment facilities identified in the preferred disposal alternative.

A Reference Conceptual Design (RCD) for the HWVP has been completed and preliminary engineering was initiated in January 1988. The DOE approved project baseline schedule for the HWVP calls for site construction to commence in July 1990, final engineering and design to be complete in mid-1993, construction to be complete in mid-1998 and "hot start up" of the facility in mid-1999. The cost of the project, including capital and expense funded expenditures, will exceed 1.2 billion dollars. The plant is designed to operate for approximately 40 years.



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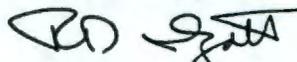
The major plant emissions/effluents and corresponding permits/approvals have been identified. Our review and interpretation of the existing environmental regulations indicate the facility will be classified as a "mixed waste" (hazardous/radioactive waste) treatment facility subject to the RCRA permitting process. Based on our understanding of this regulation and on the constraints of our project baseline schedule, we are proposing the following permitting process (see attached "HWVP Permitting Strategy").

1. The HWVP will submit a RCRA Part A Application to the Washington Department of Ecology (WDOE) and EPA by May 23, 1988.
2. In July 1990, construction of the project is scheduled to begin. (Consideration is currently being given to acceleration of start of construction.) The RCRA Part B Application will be prepared concurrent with construction and final design. During this phase, a closing working interface will be maintained between your staff and the DOE/Westinghouse Hanford Company (WHC) to ensure design and construction are being completed in a mutually agreeable method. Following completion of the final design (mid-1993), the RCRA Part B Application will be submitted to Ecology and EPA. It is expected that the close interface maintained during the Part B preparation will enable the permit to be issued by mid-1995.

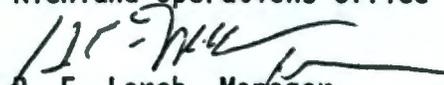
Based upon discussions with your respective staffs, it is our understanding that the submittal of the Part A by May 23, 1988, will qualify the HWVP for interim status. We also understand that construction of the facility can commence before the final facility operating permit (Part B) is approved. We recognize that operation of the facility is contingent upon the issuance of the Part B permit.

Your approval/concurrence to this proposed permitting strategy is needed before we can proceed. We are, therefore, requesting your concurrence by April 30, 1988. If you wish to discuss this strategy in more detail, please contact Mr. Hank E. McGuire, WHC, on (509) 376-3558.

Sincerely,



R. D. Izatt, Director  
Environmental Restoration Division  
U. S. Department of Energy  
Richland Operations Office



R. E. Lerch, Manager  
Defense Waste Management Division  
Westinghouse Hanford Company

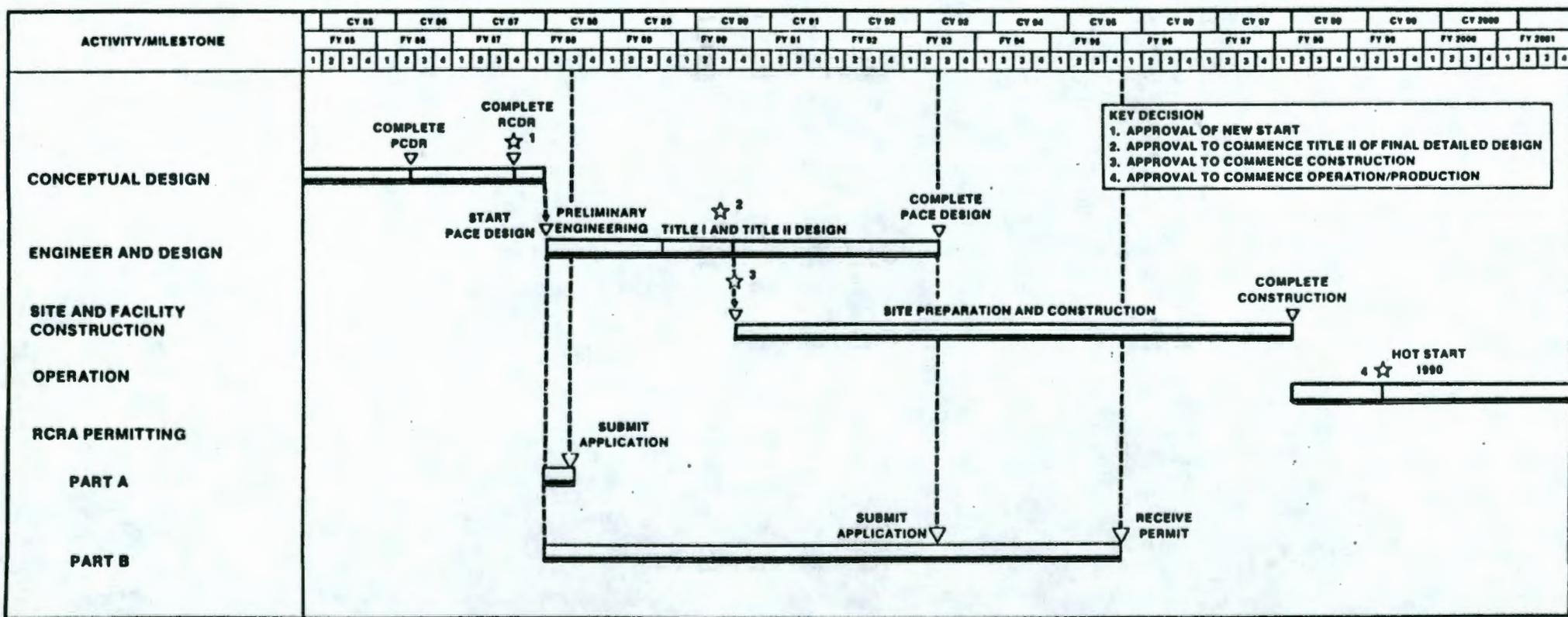
ERD:MJA

Enclosure:  
HWVP Permitting Strategy  
Preferred RCRA Permitting vs.  
Project Baseline Schedule

Distribution Attached

# HWVP Permitting Strategy

## Preferred RCRA Permitting vs. Project Baseline Schedule



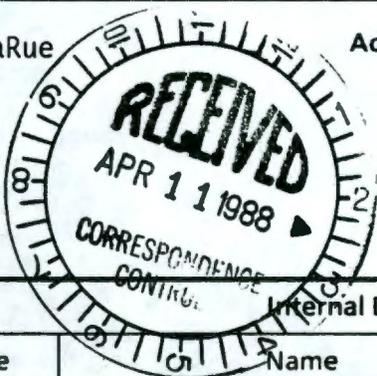
**LEGEND:**  
 PCDR - PRELIMINARY CONCEPTUAL DESIGN REPORT  
 RCDR - REFERENCE CONCEPTUAL DESIGN REPORT  
 PACE - PLANT AND CAPITAL EQUIPMENT  
 PS8803-3

**DISTRIBUTION COVERSHEET**

Author J. H. LaRue

Addressee M. Horton  
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Department of Ecology  
Olympia, WA 98504-877

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R.E. LERCH**

**APR 14 1988**

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