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Department of Energy

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

95-LWB-075

DEC 15 1994

Mr. Roger Stanley, Director
Tri-Party Agreement Implementation
State of Washington
Department of Ecology
P.O. Box 47600
Olympia, Washington 98504-7600

Mr. Douglas R. Sherwood
Hanford Project Manager
U.S. Environmental Protection Agency
712 Swift Boulevard, Suite 5
Richland, Washington 99352



Dear Messrs. Stanley and Sherwood:

CHANGE REQUEST M-26-94-01: "REVISE LERF MILESTONES M-26-03 AND M-26-04 PENDING DECISION REGARDING FUTURE USES OF LERF"

The subject formal Class II Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) change control form M-26-94-01: "Revise LERF Milestones M-26-03 and M-26-04 Pending Decision Regarding Future Uses of LERF," has been approved by the U.S. Department of Energy, Richland Operations Office (RL) and is hereby transmitted for your approval. In accordance with revised Tri-Party Agreement Article XL, paragraph 122, your action is requested within the specified 14 day period.

Decisions regarding the future uses of the Liquid Effluent Retention Facility (LERF) have not yet been finalized, however, EPA Region 10 has approved the use of LERF for a Resource Conservation and Recovery Act (RCRA) treatment unit. The conclusion of this effort will extend beyond the December 31, 1994, scheduled completion date for interim milestone M-26-03. Therefore, the subject change request extends the final decision on changes to the M-26-03 and M-26-04 milestones until August 31, 1995, thus allowing the continued use of LERF in support of the 242-A Evaporator. With this change, the LERF will be allowed to continue accepting waste from the 242-A Evaporator while the specific regulatory requirements for using LERF for RCRA treatment, under the provisions of 40 CFR 268.4, are approved and implemented.

Due to the urgency of this change request and the fact that both your agencies have reviewed it extensively, we request that this change be approved no later than the December 20, 1994, Project Managers meeting to be held in Richland, Washington.



Messrs. Stanley and Sherwood
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-2-

DEC 15 1994

Should you have any questions regarding this matter, please feel free to call me on (509) 376-6798 or Elizabeth Bowers of the Waste Programs Division on (509) 372-0738.

Sincerely,



Steve H Wisness
Hanford Project Manager

WPD:RAQ

Attachment

cc w/attach:
A. J. DiLiberto, WHC
S. D. Godfrey, WHC
M. Jaraysi, Ecology
M. Selby, Ecology

9513333.0469

Attachment

Change Request M-26-94-01

Change Number M-26-94-01	Federal Facility Agreement and Consent Order Change Control Form Do not use blue ink. Type or print using black ink.	Date 12/12/94
Originator Phone S. D. Godfrey (509) 372-0501		
Class of Change <input type="checkbox"/> I - Signatories <input checked="" type="checkbox"/> II - Project Manager <input type="checkbox"/> III - Unit Manager		
Change Title Revise LERF Milestones M-26-03 and M-26-04 Pending Decision Regarding Future Uses of LERF		
Description/Justification of Change This change control form extends the due dates for completion of interim milestones M-26-03 and M-26-04 from 12/31/94 and 6/30/95, respectively to 8/31/95 pending the parties decision regarding the future uses of LERF and to maintain consistency with approved change request M-17-93-07, "Revise due dates for completion of milestones M-17-14 and M-17-29," in which the startup date for the 200 Area Effluent Treatment Facility (ETF) was slipped by 8 months due to the SEPA determination process. <div style="text-align: right;">(Continued on next page)</div>		
Impact of Change This change will allow the continued discharge of the 242-A Evaporator process condensate stream to the LERF units pending the parties decision regarding the future uses of LERF and commensurate with approved change request M-17-93-07. This will allow the 242-A Evaporator to operate, as planned, to complete other Tri-Party Agreement milestones, without being impacted by the delays in startup of the 200 Area ETF (Project C-018H) or the decision regarding the continued use of LERF. Upon determination of the future uses of LERF, a final change to the M-26-03 and M-26-04 milestones will be addressed.		
Affected Documents Hanford Federal Facility Agreement and Consent Order, Forth Ammendment, January, 1994, Appendix D (Table D, page D-56, and Action Plan Work Schedule, page 21 of 40).		
Approvals		
DOE	12/15/94 Date	<input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved
EPA _____	Date _____	<input type="checkbox"/> Approved <input type="checkbox"/> Disapproved
Ecology _____	Date _____	<input type="checkbox"/> Approved <input type="checkbox"/> Disapproved

Description/Justification of Change (continued)

Efforts to bring the ETF on line and to identify additional treatment needs for the Hanford site have recognized the merits of continuing to utilize the LERF either as an interim storage unit or a treatment unit in the ETF treatment system. Significant cost savings and site benefits are possible through the continued use of LERF. As a result, efforts have been directed toward allowing the continued use of LERF and the milestones are changed as shown below to allow these efforts to continue.

The revised milestones are as follows:

M-26-03 Cease Discharge of 242-A Evaporator Process Condensate Effluent to LERF Units.

12/31/1994
To Be Decided By
8/31/1995

DOE may discharge process condensate effluent from the 242-A Evaporator to Liquid Effluent Retention Facility (LERF) units from December 1990 through ~~December 1994~~ August 1995 if (1) the placement of such effluent into LERF is necessary for completion of milestones required by the Agreement; (2) interim status authorization includes these units or a RCRA permit covering these units has been issued; (3) the units satisfy the requirements of 40 CFR Part 264, Subpart K, or 40 CFR Part 265, Subpart K; (4) the units maintain a floating cover which minimizes evaporation; (5) the units comply with all applicable hazardous waste requirements; and (6) prior certification of compliance with 40 CFR 268.4(a)(3) is submitted in accordance with 40 CFR 268.4(a)(4). Discharges of effluent containing hazardous waste subject to the land disposal restrictions other than process condensate from the evaporator to LERF is prohibited.

M-26-04 Remove All Hazardous Waste Residues From the 242-A Evaporator LERF Units.

6/30/1995
To Be Decided By
8/31/1995

Remove all hazardous waste residues (including any liquid waste) that do not meet LDR treatment standards and applicable prohibition levels imposed by regulation or statute and residues from wastes prohibited from land disposal where no treatment standards have been established and no prohibition levels apply, or which are not delisted pursuant to 40 CFR 260.22 and WAC 173-303-072.

CORRESPONDENCE DISTRIBUTION COVERSHEET

Author	Addressee	Correspondence No.
S. H. Wisness, RL	R. F. Stanley, Ecology D. R. Sherwood, EPA	Incoming: 9407845

Subject: CHANGE REQUEST M-26-94-01: "REVISE LERF MILESTONES M-26-03 AND M-26-04
PENDING DECISION REGARDING FUTURE USES OF LERF"

INTERNAL DISTRIBUTION

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		Presidents Office	B3-02	
		W. T. Alumkal	R2-52	X
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		C. J. Geier	R2-54	X
		S. D. Godfrey	B2-35	X
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		S. R. Moreno	B3-06	
		W. E. Ross	S5-07	X
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Assignee.....		T. B. Veneziano	H6-10	X
		J. D. Williams	H6-28	X
		B. D. Williamson	B3-15	
		AJD File/LB	N3-13	X
		ERIS	H6-08	X

