



OFFICE OF RIVER PROTECTION

P.O. Box 450, MSIN H6-60
Richland, Washington 99352

1226601

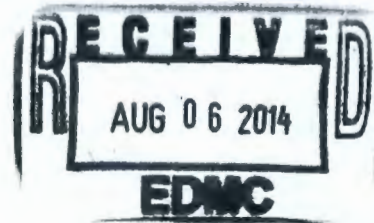


AUG 06 2014

14-ECD-0038

CCN: 269734

Ms. Jane A. Hedges, Program Manager
Nuclear Waste Program
Washington State
Department of Ecology
3100 Port of Benton Blvd.
Richland, Washington 99354



Ms. Hedges:

WASTE GENERATOR COMPLIANCE PLAN FOR THE MATERIAL HANDLING FACILITY

Reference: Ecology letter from N. Ware to K.W. Smith, ORP, and P. McCullough, BNI, "Department of Ecology's (Ecology) Dangerous Waste Compliance Inspection of Generator Activities at the Material Handling Facility (MHF), RCRA Site ID WA78900008967, on May 19, 2014," 14-NWP-135, dated July 10, 2014.

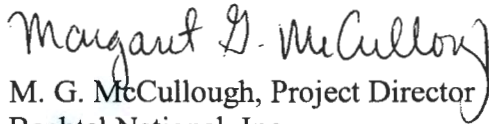
In the Reference, the Washington State Department of Ecology (Ecology) identified the incorrect use of the Hanford Site U.S. Environmental Protection Agency Identification #WA7890008967 for waste generator activities at the Material Handling Facility (MHF) in Richland, Washington. The Waste Treatment and Immobilization Plant Project agrees with Ecology's assessment that the Hanford Site Identification #WA7890008967 should not be used for waste generator activities at the MHF in Richland, Washington, since it is not one contiguous site. Corrective actions required by Ecology are: 1) follow the instructions in WAC 173-303-060 for notification and for obtaining identification numbers as appropriate; 2) complete process to determine if a site identification number is needed; and 3) provide that determination to Ecology in writing. This letter provides written confirmation of planned corrective actions.


The U.S. Department of Energy and Waste Treatment and Immobilization Plant have evaluated the requirements in WAC 173-303-060 against the dangerous waste generation activities at the MHF. The generation rates observed at the MHF qualify the facility as a small quantity generator. Therefore, MHF will be managed as a small quantity generator in accordance with WAC 173-303-070(8) for the foreseeable future, and we do not plan to apply for a separate U.S. Environmental Protection Agency identification number at this time. The U.S. Department of Energy is evaluating other contractor's activities in the surrounding Port of Benton area to ensure compliance with the identification number requirements.

1220405

AUG 06 2014

If you have any questions, please contact Lori A. Huffman, Director, Environmental Compliance Division, ORP, (509) 376-0104, or Roger Landon, BNI, Environmental Protection Manager (509) 371-2165.


M. G. McCullough, Project Director
Bechtel National, Inc.


Kevin W. Smith, Manager
Office of River Protection

ECD:GMN

cc: L.W. Baker, BNI
C.D. Cornelison, BNI
S.S. Crawford, BNI
J.H. Dunkirk, BNI
B.G. Erlandson, BNI
C.M. Gallaway, BNI
S. Hajner, BNI
K.D. Irwin, BNI
J.M. St. Julian, BNI
R.J. Landon, BNI
M.G. McCullough, BNI
C.A. Musick, BNI
S.A. Neubauer, BNI
R.C. Nugent, BNI
W.S. Oxenford, BNI
E.F. Sproat, III, BNI
T.L. Teigen, BNI
R.L. Widhalm, BNI
Administrative Record (WTP H-0-8)
BNI Correspondence
Environmental Portal, LMSI