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STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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December 7, 2001

Mr. James E. Rasmussen  
United States Department of Energy  
Office of River Protection  
P.O. Box 450, MSIN: H6-60  
Richland, Washington 99352

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EDMC

Dear Mr. Rasmussen:

Re: Letter to Michael A. Wilson, Washington State Department of Ecology, from James E. Rasmussen, United States Department of Energy, "U.S. Department of Energy Draft Hanford Federal Facility Agreement and Consent Order Submittal of Hazardous Waste Facility Permit Part A Application Form 3 Revision 7 Milestone M-23-21," dated October 30, 2001, 01-OMD-043

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The Washington State Department of Ecology (Ecology) reviewed Revision 7 of the Single Shell Tank (SST) Hazardous Waste Facility Permit Part A submitted in the referenced letter. This letter serves as notification that Ecology deems the milestone to be complete, subject to the necessary clarifications below. Ecology will deem the Hazardous Waste Permit Part A Application Form 3 Revision 7 acceptable, provided it is modified to include the clarifications listed below.

- Ecology is not conferring any blanket approval of liquid additions prior to satisfaction of Milestone M-45 requirements. The framework for evaluating addition of liquids for purposes of retrieval from the SSTs is set forth in the Milestone M-45 series. Ecology anticipates that the Functions and Requirements (F&R) documents to be prepared before retrieval of each SST will include sufficient information to allow Ecology to determine if additions of liquids for retrieval will be allowed. Ecology will transmit written approvals or disapprovals for the F&R documents that will include determinations on the addition of liquids. Once Ecology has provided formal approval for liquid additions according to M-45, Ecology may request revisions of the SST system description attached to the Part A. Ecology requests that Section C, Process Codes S02, T01, paragraph 4, sentence 2, item b) be revised to reflect this issue as follows: "Liquids are added for the purposes of retrieval. Retrieval liquids may be added to the SSTs only following appropriate Ecology approvals pursuant to M-45 and any subsequent applicable M-45 milestones."



Mr. James E. Rasmussen  
December 7, 2001  
Page 2

- Section C, Process Codes S02, T01 paragraph 4, sentence 1 states that treatment occurs when cooling liquids are added to the SSTs. On March 27, 2001, Ecology approved the cessation of psychrometric monitoring of tanks 241-C-105 and 241-C-106,<sup>1</sup> based upon information provided by the Office of River Protection (ORP) affirming that liquids were no longer added to those tanks.<sup>2</sup> Ecology is aware that the United States Department of Energy (USDOE) designated nine (9) tanks that contain strontium-rich sludge as high heat load tanks; however, those tanks are ventilated to maintain temperatures below Technical Safety Requirements.<sup>3</sup> From the information provided, Ecology cannot determine if ORP intends to stop adding cooling water, to resume additions of cooling water, or to document past practices. Clarification is required.
- Same section, process codes and paragraph, sentence 2 states that saltwell pumping transfers may use hose-in-hose overground transfer lines instead of direct buried lines. The hose-in-hose lines are not listed in Table 7 Active Transfer Lines. If the lines are included in the SST system for saltwell pumping, they should be described in Table 7. Ecology assumes that uses of such lines for other than saltwell pumping will be described in system descriptions included in Double Shell Tank Part B permit applications, per Washington Administrative Code (WAC) 173-303-806(4)(c)(iv). Clarification is required.

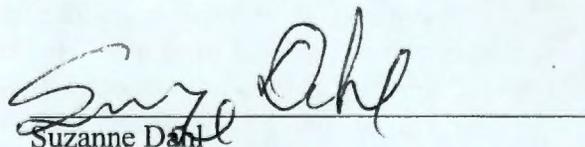
Please submit an edited copy of the Part A, Form 3 to reflect these clarifications within thirty (30) days.

If you have any questions on this matter, please contact Melinda Brown at (509) 736-3027 or Suzanne Dahl at (509) 736-5705.

Sincerely,



Melinda Brown  
Tank Waste Storage Project Manager  
Nuclear Waste Program



Suzanne Dahl  
Tank Waste Disposal Project Manager  
Nuclear Waste Program

MB:SD:sb  
cc: (see next page)

<sup>1</sup> Letter, Melinda Brown to Mr. Harry L. Boston and Ms. Mary P. DeLozier, "Transmittal of Concurrence with Decision to Cease Collecting Psychrometric Survey Data for Single Shell Tanks 241-C-105 and 241-C-106," dated March 27, 2001.

<sup>2</sup> Letter, James E. Rasmussen to Mr. Michael A. Wilson, "Cessation of Psychrometric Survey Data Collection From Tanks 241-C-105 and 241-C-106," dated February 26, 2001, 01-OPD-016.

<sup>3</sup> HNF-EP-0182, Rev. 154, Table D-1. Temperature Monitoring in Watch List Tanks, pp. D-2 through D-3.

Mr. James E. Rasmussen  
December 7, 2001  
Page 2

cc: Dave Bartus, EPA  
Doug Sherwood, EPA  
Joel Hebdon, USDOE  
Keith Klein, USDOE  
Ellen Mattlin, USDOE  
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Mary Burandt, USDOE-ORP  
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Owen Kramer, FH  
Todd Martin, HAB  
Richard Gay, CTUIR  
Pat Sobotta, NPT  
Russell Jim, YN  
Ken Niles, OOE  
Administrative Record: Single Shell Tank Part A