

# START

CHRISTINE O. GREGOIRE  
Director



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STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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October 23, 1989

Captain Arthur Clark, Commander  
Puget Sound Naval Shipyard  
Department of the Navy  
Bremerton, Washington 98314-5000

Mr. Mike Lawrence, Manager  
U.S. Department of Energy  
Richland Operations Office  
P.O. Box 550  
Richland, Washington 99352



Dear Captain Clark and Mr. Lawrence:

**RE: Submarine Reactor Compartment Shipment and Disposal**

Over the past several months our respective staffs have spent considerable time investigating and evaluating regulatory issues associated with the handling, shipment, and disposal of the Navy's submarine reactor compartment (RC) packages. Our discussions and correspondence have focused on Polychlorinated Biphenyls (PCBs), chromium compounds, lead, and the applicability of federal and state environmental statutes. Oregon and Washington have also stressed the importance of assuring the citizens of the Northwest that the shipment and disposal of the RC packages is being conducted in a safe and proper manner.

Our discussions have resulted in the following actions and commitments:

1. The Navy has agreed to remove PCB-laden felt material from the RC packages and to manage these PCBs, and any remaining residual PCBs, in accordance with the Toxic Substance Control Act (TSCA) (40 CFR 761). Removal of the PCBs in RC packages now at Hanford will be completed by mid-1990. Removal of PCB-laden felt from future RC packages will be performed at Puget Sound Naval Shipyard prior to shipment to Hanford. Removal of the felt material will also result in the removal of chromium contaminants.
2. The Navy has recognized that lead remaining within the RC packages is subject to Washington's Hazardous Waste Management Act (Chapter 70.105 RCW), and consequently, must be managed as such during shipment, storage, and disposal. Furthermore, the Navy will ensure that the U.S. Department of Energy (USDOE), as custodian of the RC package disposal site, will take the necessary actions to assure compliance with state requirements. The state acknowledges that USDOE has initiated such action by filing an acceptable amended hazardous waste Part A permit application to cover the RC package disposal trench.

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3. The Navy has committed to perform a detailed study assessing the feasibility of removing or reclaiming lead in RC packages now and in the future. The study is required to satisfy the provisions of the state Hazardous Waste Management Act (Chapter 70.105.050 RCW).
4. The Navy has demonstrated to the satisfaction of the state that no other toxic or hazardous materials, other than the lead previously cited, remain within the RC packages. The Navy will provide the state with a detailed report documenting its sampling and evaluation methodology and results.
5. The Navy has participated with the state in conducting four public briefings to discuss the waste issues and their resolution.

The actions and commitments described above establish a course of action which, when completed, will satisfy the state's regulatory requirements and the concerns expressed by Governor Gardner. Accordingly, I am hereby notifying you that the Department of Ecology has no objection to the reinitiation of RC package shipments at this time. Enclosed is a listing of pertinent correspondence which collectively define the basis of our agreement on the actions to be taken.

Sincerely,



Christine O. Gregoire  
Director

COG:RS/lm  
Enclosure

cc: Jeff Breckel  
Gil Hasselberger  
George Hofer  
Jim Mangeno  
Dan Silver

**Pertinent Correspondence Defining Agreements and Commitments  
Relating to the Shipment and Disposal of  
Submarine Reactor Compartment Packages**

1. Letter to the Honorable H. Lawrence Garrett, III, Secretary of the Navy, from Governors Gardner and Goldschmidt, dated August 29, 1989, regarding PCBs and other toxic and hazardous materials in submarine reactor compartment packages.
2. Letter to Governor Gardner from H. Lawrence Garrett, III, Secretary of the Navy, dated September 22, 1989.
3. Letter to Jim Mangeno, Naval Sea Systems Command, Code 08, from Roger Stanley, Program Manager, Nuclear & Mixed Waste Management, Washington Department of Ecology, dated October 10, 1989.
4. Letter to Gary L. O'Neil, Director, Air and Toxics Division, Region X, U.S. Environmental Protection Agency, from Captain A. Clark, Commander, Puget Sound Naval Shipyard, 2300.1/9211/30/2, RJB: 3839-89, dated October 12, 1989.
5. Letter to Christine Gregoire, Director, Washington Department of Ecology, from Captain A. Clark, Commander, Puget Sound Naval Shipyard, 2300.1/9211/30/2, RJB: 3838-89, dated October 13, 1989.
6. Letter to Captain A. Clark, Commander, Puget Sound Naval Shipyard, from Roger Stanley, Program Manager, Nuclear & Mixed Waste Management, Washington Department of Ecology, dated October 16, 1989.
7. Letter to Roger Stanley, Program Manager, Nuclear & Mixed Waste Management, Washington Department of Ecology, from Captain A. Clark, Commander, 2300.1/9211/30/2, GTG: 3849-89, dated October 17, 1989.
8. Letter Captain A. Clark, Commander, Puget Sound Naval Shipyard, from Gary L. O'Neal, Air and Toxics Division, U.S. Environmental Protection Agency, dated October 20, 1989.

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**Author**

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**Addressee**

A. Clark, Dept. of Navy  
M. J. Lawrence, DOE-RL

**Correspondence No.**

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**Subject**

Submarine Reactor Compartment

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