



Department of Energy

9200812

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

JAN 16 1992

91-RPA-076

Mr. Timothy L. Nord
Hanford Project Manager
State of Washington
Department of Ecology
Mail Stop PV-11
Olympia, Washington 98504



Dear Mr. Nord:

INFORMATION REQUEST FROM GARY ANDERSON

Reference: Letter, Gary Anderson, Washington State Department of Ecology (Ecology), to Brad Erlandson, Westinghouse Hanford Company (WHC), "Recent Meetings," dated November 21, 1991.

The DOE Richland Field Office (RL) recently received the referenced correspondence from WHC. Please note that all correspondence and requests for information should be directed to RL and not to its contractors. Timely responses to Ecology's requests can better be accommodated if RL is made aware of issues and concerns directly instead of through our contractors.

Mr. Anderson's correspondence refers to recent meetings held to work out problems concerning the application of the hazardous waste regulations to real problems at the Hanford Site, without giving dates or references. RL can more effectively respond to Ecology's requests for information if we are provided with specific information concerning the dates of the meetings and the subject matter which was discussed. Given that Mr. Anderson has not provided dates or references, RL can only speculate as to which meetings Mr. Anderson is addressing in his correspondence.

We believe the meetings being referred to took place on August 1, 1991, and October 25, 1991. The subject of the August meeting was the design of a replacement tank for the 241-S-302 A Catch Tank. A handwritten list of agreements was prepared and signed by RL and Ecology Staff (Enclosure 1). All commitments made at the meeting have been satisfied. The October meeting provided an opportunity to discuss Ecology's rejection of RL's petition to consider the Plutonium/Uranium Extraction secondary containment system an equivalent containment device. At that meeting, RL agreed to provide a letter documenting their approach to the secondary containment issue. This letter has been provided to Mr. Anderson in draft form.

Mr. Anderson's request for information, received by phone, concerning pump characteristics will be addressed at the February Double-Shell Tank Unit Managers' meeting.

Mr. Timothy L. Nord
91-RPA-076

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In closing, I would like to reiterate that all correspondence and requests for information should be directed to RL and not to its contractors. If you have comments or questions regarding this letter, please contact Ellen B. Dagan, RL, on (509) 376-3811.

Sincerely,

Robert S. Holt /for
R.D. Izatt, Program Manager
Office of Environmental Assurance,
Permits, and Policy

EAP:EBD

Enclosure:
241-S-302A Catch Tank

cc w/encl:

~~D.E. Lerch - WHC~~



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Mail Stop PV-11 • Olympia, Washington 98504-8711 • (206) 459-6000

November 21, 1991

Mr. Brad Erlandson
Westinghouse Hanford Corporation
P.O. Box 1970
Richland, Washington 99352

RECEIVED
B. G. ERLANDSON

DEC 05 1991

Re: Recent Meetings

ACTION _____
COPIES _____
ROUTE _____
FILE _____

Dear Mr. Erlandson:

We have recently had meetings to attempt to work out some problems concerning the application of the hazardous waste regulations to real problems at the Hanford Reservation. During these meetings, I have requested that you furnish certain information so that I could make informed decisions on questions you have asked.

To this day, I have not received any of the information requested. My request for pump characteristics used in hazardous waste sumps has been ignored. The meeting notes you volunteered to write at the PUREX plant meeting have not been received.

I have no idea what your intentions are in calling a meeting, since nothing ever results from attending them.

I am optimistic that some solutions to our mutual problems can be reached through the application of good engineering practice, but only if there is a mutual exchange of information. So far the flow has been one way.

Sincerely,


Gary Anderson P.E.
Environmental Engineer 3
Department of Ecology

TLN:ga

cc: Dan Duncan, EPA
T. Veneziano, WHC
Steve Wisness, DOE
Toby Michelena, Ecology

241-S-302 A Catch Tank
August 1, 1991

Agreements

1. Release Drawings & specs for S-304 Catch Tank. (WHC)
2. Release Tank Farm Upgrade Study (WHC)
3. Identify individual & schedule for negotiation of Tank upgrade milestones (Ecology)
4. Comment on design (3-5 days (Ecology) & Determine/verify Secondary Containment designation (i.e. level of containment of structure)

Attendees

Sandy Trine (DOE)
Ellen B. Dagan (DOE)
Cindy Stout (WHC)
Joel Ecker (WHC)
Brad Erlandson (WHC)
Gary Anderson (Ecology)

Sandy Trine
Sandy Trine

Gary Anderson
Gary Anderson

DON'T SAY IT --- Write It!

DATE: October 25, 1991

TO: Dennis Brown

FROM: Richard X. Gonzalez

Telephone: 6-8218

cc: 4410 file

SUBJECT: Meeting with Gary Anderson of Washington Department of Ecology

This following summary is written in an effort to document our informal meeting with Gary concerning secondary containment at PUREX.

* Gary interpreted our "Petition for Equivalency of Secondary Containment" as an effort to classify the systems at PUREX as vaults. As such he concluded that they were noncompliant with vault requirements.

* In general, Ecology will require lining for any concrete which is apt to catch a hazardous waste spill.

* WAC 173-303-640 (4)(d)(iv) states that an "equivalent device as approved by" Ecology may be utilized as secondary containment for tanks. WAC 173-303-640 (4)(g) puts forth the conditions under which a "variance" may be obtained. Gary initially interpreted this section to mean that a "variance" is required for Ecology to approve an "equivalent device". Upon questioning this interpretation, Gary agreed to verify his interpretation with Ecology's legal staff. RL should follow up on this interpretation.

* Gary stated that Ecology would seriously consider approving the use of the PUREX building as an equivalent secondary containment device if the plant remained in standby until Closure activities began. If the status of PUREX changed (from to standby to operational mode) then the secondary containment would necessarily be addressed again.

Gary must have sufficient information to convince his bosses that Ecology should approve an "equivalent device". WHC will supply this information in the form of another "Petition" which clarifies that the PUREX building adequately protects human health and the environment. This petition will at a minimum supply the following information as available:

- 1) Future use scenarios for PUREX and the most likely one
- 2) Demonstrate through objective evidence that the concrete is sound (i.e., leak tests, sonic tests)
- 3) State (in cover letter) that WHC/RL interprets WAC 173-303-640 as stating that a variance is only required for exemption from secondary containment and RL is not asking for such an exemption. WHC/RL attests that the present PUREX design is "an equivalent device").

* WHC/RL will submit a letter to Ecology describing the planned future course of action with regard to secondary containment at PUREX. It is expected that this course of action will include the revision of the previous

"petition" to reflect that RL has determined that the PUREX is an "equivalent device". (It is highly suggested that the word "petition" be removed from this document. i.e, tell them that this is our determination, don't ask for permission). Informal conversations/draft submittals with/to Gary will be made in order to better identify the final contents of 1) the abovementioned letter and 2) the revised "petition".

CORRESPONDENCE DISTRIBUTION COVERSHEET

Author: B. G. Erlandson, 6-5969 Addressee: T. L. Nord, Project Manager Correspondence No.: Incoming: 9200812
(Xref 9159286D)

Subject: INFORMATION REQUEST FROM GARY ANDERSON

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