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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

1315 W. 4th Avenue • Kennewick, Washington 99336-6018 • (509) 735-7581

December 22, 1999

Mr. Steven Wisness, Director
Office of Site Services
United States Department of Energy
Richland Operations Office
P.O. Box 550, MSIN: A5-18
Richland, Washington 99352

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EDMC

Dear Mr. Wisness:

Re: Hanford Facility Dangerous Waste Part A Permit Application, Form 3, for the Waste Encapsulation Storage Facility (WESF), Revision 0 (WA7890008967)

After meeting with your staff and facility representatives, the Washington State Department of Ecology (Ecology) has again reviewed the referenced Part A (Form 3) submitted December 1997, as well as the March 1998 revisions.

Ecology agrees that the revision number does not need to be changed; the first approved Part A, Form 3, for WESF will be Revision 0. However, Ecology will not accept the Part A (Form 3) as submitted for the following reasons:

- The S99 miscellaneous storage description must include a detailed description of the capsules, storage areas/equipment, and ancillary systems used for the management of dangerous waste at the WESF. Chapter 173-303-805(7)(a)(i), Washington Administrative Code (WAC) requires "justification detailing the equipment and process or processes that the owner or operator will use to treat, store, or dispose of the new dangerous waste."
- The process design capacity may reflect the maximum capacity of the WESF; however, the estimated annual quantity of waste must reflect the actual volume/weight of waste that was in storage at the time the Tri-Party Agreement (TPA) Milestone M-92-03 was established.

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The original TPA Milestone M-92-03 was for the United States Department of Energy (USDOE) to "Submit modified Hanford Facility Part A Permit Applications to Ecology incorporating all Hanford Site Cs/Sr capsules (300 Area and unencapsulated salts) for which a commercialization contract has not been executed." All Cs/Sr has reportedly been transferred to WESF (letter 99-TPA-059, Sanders to EPA/Ecology, December 12, 1998) and, according to the *Project Management Plan for WESF ¹³⁷Cs & ⁹⁰Sr Capsule Storage*, HNF-SD-WM-PMP-025, Rev. 0, additional Cs and Sr capsules currently located at other USDOE Sites are not expected to be returned to Hanford.

Please incorporate these changes and resubmit the certified Part A Permit Application (Form 3) for the WESF, Revision 0, within sixty (60) days of receipt of this letter.

If you have any questions regarding this information, please contact me at (509) 736-3003.

Sincerely,



Brenda L. Becker-Khaleel
Nuclear Waste Program

BB:ld

cc: Pete Knollmeyer, USDOE
Cliff Clark, USDOE
Ellen Mattlin, USDOE
Gloria Williams, USDOE
Sen Moy, USDOE
Paul Saueressig, FDH
Fen Simmons, FDH
Brian Oldfield, WM

Administrative Record: Waste Encapsulation and Storage Facility