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Department of Energy  
Richland Operations Office  
P.O. Box 550  
Richland, Washington 99352

02-ERD-0078

JUN 4 2002

Mr. M. C. Hughes, President  
Bechtel Hanford, Inc.  
3350 George Washington Way  
Richland, Washington 99352

RECEIVED  
JUN 25 2002  
EDMC

Dear Mr. Hughes:

CONTRACT NO. DE-AC06-93RL12367 - REVIEW OF THE "ENVIRONMENTAL RESTORATION DISPOSAL FACILITY WASTE ACCEPTANCE CRITERIA," REV. 4, DRAFT A (BHI-00139)

Attached are the informal comments from the U.S. Environmental Protection Agency (EPA). After your assessment of their comments, you are requested to meet with EPA and the U.S. Department of Energy, Richland Operations Office to resolve any remaining questions pertaining to Rev. 4.

If you should have any questions, please contact Owen Robertson, of my staff, at (509) 373-6295.

Sincerely,

Helen E. Bilson, Assistant Manager  
for the River Corridor

ERD:OCR

Attachment

cc w/attach:  
V. R. Dronen, BHI  
D. R. Einan, EPA  
Administrative Record (ERDF)

**EPA's comments on the "Environmental Restoration Disposal Facility Waste Acceptance Criteria," BHI-00139, Rev. 4, Draft A**

Global Comments

1. Remove references to DOE 435.1 throughout.
2. Reinstate the prohibition on greater-than-Class C waste, which will affect Table 2 and Section 4.3.5.

Specific Comments

1. Section 4.2.2, page 14, 1<sup>st</sup> paragraph: When evaluating waste sources that are above the limits in Table 2, this draft states that the case-by-case basis using the "ERDF Waste Staging Area Profile Datasheet" instead of the "ERDF Radiological Inventory Assessment Data Sheet." Please explain why this was changed.
2. Section 4.3.5, page 17, last bullet: Please explain why the remedy for dealing with infectious wastes has been changed from "unless disinfected" to "treated to reduce to the maximum extent practicable...."
3. Section 4.3.5: Please explain why the restriction of wastes containing greater than 1% chelating compounds by weight was removed.
4. Appendix A: Add to the definition of structural stability that the waste form should maintain gross physical properties and identity over 300 years.