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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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February 18, 2004

Mr. Roy Schepens, Manager
Office of River Protection
United States Department of Energy
P.O. Box 550, MSIN: H6-60
Richland, Washington 99352

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EDMC

Re: Office of River Protection – Integrated Disposal Facility Dangerous Waste Permit Application (DOE/RL-2003-12 Revision 0)

Enclosed are Notice of Deficiency (NOD) comments prepared by the Washington State Department of Ecology (Ecology) on the *River Protection Project – Integrated Disposal Facility Dangerous Waste Permit Application* (DOE/RL-2003-12 Rev. 0). A permit under the Dangerous Waste Regulations is required to construct and operate the dangerous waste storage facility per Washington Administrative Code (WAC) 173-303-806(5). The United States Department of Energy (USDOE)-Office of River Protection (ORP) submitted the Integrated Disposal Facility (IDF) permit application to Ecology on June 23, 2003. Ecology, USDOE-ORP, and CH2M Hill Group (CHG) held a series of meetings to discuss Ecology's NOD comments. CHG and ORP formulated their responses to the NODs and forwarded them to Ecology. The responses have been reviewed with the exception of #68 and have been accepted. The outstanding NOD concerns the need for vadose monitoring and will be resolved through incorporation of a permit condition.

Prior to the issue of the Draft IDF Permit for public comment, two other significant issues must be resolved. These two issues will be resolved through permit conditions if necessary.

1. Ecology will need to assess the State Environmental Policy Act (SEPA) coverage offered by the *Hanford Solid Waste Environmental Impact Statement* (DOE/EIS-0286f) that the USDOE wrote to evaluate treatment and disposal of waste at the Hanford Site. Our review may delineate the need for further SEPA analysis to ensure that we make an informed determination about any significant adverse impacts to public health and the environment before we issue the IDF draft permit.
2. Ecology and USDOE must develop Waste Acceptance Criteria that will exclude wastes that may cause an exceedance of groundwater standards in the future. To this end, we need to develop a risk management approach to contaminant source terms.

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Ecology appreciates the support that you and your contractor staff have provided. We look forward to the completion of this permitting effort.

If you have any questions, please contact Sterling L. Derrick at (509) 736-5703.

Sincerely,



Suzanne Dahl
Tank Waste Disposal Project Manager
Nuclear Waste Program

SD:SLD:jc

Enclosure

cc: Joel Hebdon, USDOE-RL
Todd Martin, HAB
Ken Niles, ODE
Stuart Harris, CTUIR
Pat Sobotta, NPT
Russell Jim, YN
Administrative Record: Integrated Disposal Facility

cc/enc: Philip Lamont, USDOE-ORP
Greg Parsons, CHG