



Department of Energy

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

NOV 29 1989



Mr. Roger F. Stanley, Program Manager
Statement of Washington
Department of Ecology
Mail Stop PV-11
Olympia, Washington 98504-8711

Dear Mr. Stanley:

SUBMITTAL OF UNMANIFESTED DANGEROUS WASTE REPORT FOR THE HANFORD PATROL ACADEMY DEMOLITION SITE

Enclosed are three Treatment Storage and Disposal (TSD) Facility Unmanifested Dangerous Waste Reports for waste shipments to the Hanford Patrol Academy Demolition Site (HPADS). The HPADS has periodically received shipments of shock sensitive and explosive dangerous wastes from Hanford Site generators for treatment by demolition. The only available route for transportation requires use of a public right-of-way. Therefore, when wastes are received at the demolition site they should be managed as offsite shipments. The Resource and Conservation and Recovery Act Interim Status Assessment for the HPADS submitted to the Washington State Department of Ecology (Ecology) in April of 1989 identified that the manifest system requirements described in WAC 173-303-370 applied to offsite waste shipments received at the demolition site. However, some of the wastes included in these shipments can potentially contain materials which cannot be listed on a Uniform Hazardous Waste Manifest according to Department of Transportation (DOT) guidelines. Unmanifested shipments of dangerous wastes occurred on March 2, 1989, April 26, 1989, and July 19, 1989. As a result a TSD Facility Unmanifested Dangerous Waste Report is being submitted for each of these shipments. Formal clarification is being sought from DOT regarding application of transportation regulations to local and governmental jurisdictions involved in hazardous materials transport.

The enclosed reports were prepared according to instructions received from Dave Saunders of Ecology. Currently, efforts are under way to clarify and formalize how future shipments of shock sensitive and explosive dangerous waste will be transported to the HPADS.



Roger F. Stanley

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Questions regarding these reports can be directed to Sandy L. Trine, U.S. Department of Energy, Richland Operations Office, on (509) 376-6943 or Lisa A. Garner, Westinghouse Hanford Company, on (509) 376-5969.

Sincerely,



R. D. Izatt, Director
Environmental Restoration Division
Richland Operations Office

ERD:SLT



R. E. Lerch, Manager
Environmental Division
Westinghouse Hanford Company

Enclosure

cc w/encl:
R. E. Lerch, WHC
AR FILE

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