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STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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December 2, 1992



Mr. Roger D. Freeberg, Director  
Environmental Restoration Division  
U.S. Department of Energy  
P.O. Box 550  
Richland, WA 99352

Dear Mr. Freeberg:

Re: Environmental Restoration (ER) Treatment, Storage and Disposal System (ERTSDS): Initiation of Discussions Regarding the ER Storage and Disposal Facility (ERSDF)

Thank you for the invitation contained within your letter of November 16, 1992. I understand the referenced meeting is being developed for early December, and we certainly hope to attend and participate in the meeting. Your willingness to involve the regulatory agencies at the front end is commendable and we anticipate making every effort to facilitate reaching constructive solutions on this issue.

There is one point that we have been discussing with Paul Day, and would also like to bring to your attention. We agree that there will be a significant need for disposal capacity for soils and wastes generated at CERCLA operational units on the Hanford facility. We believe, however, that need will be equally significant for the same types of wastes being generated under RCRA closures and corrective actions.

Although we recognize that the administrative requirements of RCRA can be significant in the long term, we believe that this type of disposal facility could proceed under interim status and therefore there should be no need to delay any of the decision making or construction necessary for this facility. Given that your December 16 letter acknowledges the need to meet all the substantive ARARs of RCRA, we suggest that at least initially, we move forward on the premise of RCRA permitted landfill. We believe that the long-term administrative problems that come with that approach are more than offset by the additional efficiency gained of having to deal with a single facility. Also, the administrative aspects of permitting may in some ways be advantageous in that they provide both a better legal defense against outside challenges as well as providing a venue for public involvement in a way that suits both the RCRA and the CERCLA requirements.

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If our approach proves to be an untenable assumption, we can deal with the problem later. Meanwhile, we look forward to working with you on this issue and initiating construction on this necessary piece of infrastructure for the remediation of the Hanford Site.

Sincerely,



David B. Jansen, P.E.  
Hanford Project Manager  
Nuclear & Mixed Waste Management Program

DBJ:dr

cc: Paul Day, EPA  
Steve Wisness, DOE  
James Goodenough, DOE  
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Subject: ENVIRONMENTAL RESTORATION (ER) TREATMENT, STORAGE AND DISPOSAL SYSTEM (ERTSDS): INITIATION OF DISCUSSIONS REGARDING THE ER STORAGE AND DISPOSAL FACILITY (ERSDF)

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