



Department of Energy

Richland Field Office

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JUN 15 1993

93-RPS-218

Mr. George C. Hofer
Hanford Project Manager
U.S. Environmental Protection Agency
Region 10
1200 Sixth Avenue
Seattle, Washington 98101

Mr. Roger F. Stanley, Director
Tri-Party Agreement Implementation
State of Washington
Department of Ecology
P.O. Box 47600
Olympia, Washington 98504-7600



Dear Messrs. Hofer and Stanley:

REQUEST FOR DEFERRAL OF SUBMITTAL OF THE HANFORD FACILITY DANGEROUS WASTE PERMIT APPLICATION, 222-S LABORATORY COMPLEX, REVISION 1 (TSD: TS-2-1)

The U.S. Department of Energy, Richland Operations Office (RL) requests that the submittal of the Hanford Facility Dangerous Waste Permit Application, 222-S Laboratory Complex (222-S Part B), Revision 1, be deferred until January 31, 1996. This request is based on the schedule for development of four projects that will upgrade the 222-S as necessary to be in compliance with the Washington Administrative Code Dangerous Waste Regulations.

The 222-S Part B, Revision 0, was submitted to the State of Washington Department of Ecology (Ecology) on December 21, 1991, in accordance with the Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) Milestone M-20-22. On November 11, 1992, RL received from Ecology notice of deficiency (NOD) comments for the 222-S Part B, Revision 0. The NOD comments were incorporated into a NOD response table and sent to Ecology on March 10, 1993. In accordance with the established guidelines in the Tri-Party Agreement, the submittal of Revision 1 is due to Ecology 220 days after Ecology's review of the NOD response table. Based on Ecology's comment responses and the Tri-Party Agreement guidelines, the submittal of Revision 1 is due February 3, 1994.

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On March 23, 1993, a presentation was given during the 222-S Unit Managers Meeting (UMM) to Mr. Gary Anderson of Ecology and Mr. Dan Duncan of the U.S. Environmental Protection Agency (EPA) on the four projects to upgrade the 222-S. The following is a brief description of each project:

- Project W-041 "222-S Environmental Hot Cell Expansion" - This project will add a new hot cell for testing highly radioactive samples and is scheduled to be completed in March 1994.
- Project W-087 "222-S Radioactive Waste Lines" - This project will replace the underground pipelines with new double encased pipelines from the 222-S Analytical Laboratory to the 219-S Waste Handling Facility and between the 219-S Waste Handling Facility and the Double-Shell Tank (DST) System. The new pipeline to the DST System is not part of the 222-S but is included in the DST System Dangerous Waste Permit Application. The definitive design is tentatively scheduled for RL approval by October 1994.
- Project W-178 "219-S Double Containment Upgrade" - This project will provide secondary containment capabilities in the 219-S to bring this unit into compliance with Washington Administrative Code 173-303-640. In addition, a new 1,900 gallon mixed waste storage tank will be installed. The definitive design is tentatively scheduled for RL approval by October 1995.
- 222-S Dangerous and Mixed Waste Storage Area - "Replacement of Storage Modules" - The existing storage modules will be replaced with new units that meet Uniform Building Code, National Fire Protection Association, and federal, state, and local regulations for storing ignitable and reactive waste. The change-out of the storage modules and closure of the replaced modules is tentatively scheduled for RL approval by June 1994.

At the UMM, Mr. Cliff Clark of RL explained that because of the resources required to develop a permit application revision, it would be prudent to defer submittal of Revision 1 until the projects have been approved by the U.S. Department of Energy-Headquarters (DOE-HQ) and more definitive design information is available. Mr. Anderson agreed and requested that RL submit a letter to Ecology requesting the deferral. At future UMMs, Ecology will be provided updates of the status of these projects.

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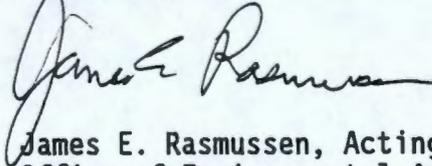
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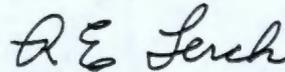
Should you have any questions regarding this request for deferral of the submittal of the 222-S Part B, Revision 1, please contact Mr. C. E. Clark of RL on (509) 376-9333 or Ms. S. M. Price of the Westinghouse Hanford Company on (509) 376-1653.

Sincerely,



James E. Rasmussen, Acting Program Manager
Office of Environmental Assurance,
Permits, and Policy
DOE Richland Operations Office

EAP:CEC



R. E. Lerch, Deputy Director
Restoration and Remediation
Westinghouse Hanford Company

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Subject: REQUEST FOR DEFERRAL OF SUBMITTAL OF THE HANFORD FACILITY DANGEROUS WASTE PERMIT APPLICATION, 222-S LABORATORY COMPLEX, REVISION 1 (TSD: TS-2-1)

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