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Department of Energy

Richland Field Office

P.O. Box 550

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OCT 14 1993

Ms. Dru Butler, Program Manager
Nuclear and Mixed Waste Program
State of Washington
Department of Ecology
P.O. Box 47600
Olympia, Washington 98504-7600

Mr. George C. Hofer, Chief
Hazardous Waste Division
U.S. Environmental Protection Agency
Region 10
1200 Sixth Avenue, HW-124
Seattle, Washington 98101

Dear Ms. Butler and Mr. Hofer:

SUPPLEMENTAL INFORMATION TO THE HANFORD FACILITY DANGEROUS WASTE PERMIT APPLICATION, 616 NONRADIOACTIVE DANGEROUS WASTE STORAGE FACILITY AND 305-B STORAGE UNIT

Enclosed is supplemental information for the Hanford Facility Dangerous Waste Permit Application pertaining to the 616 Nonradioactive Dangerous Waste Storage Facility (616 NRDFS) and the 305-B Storage Unit (305-B). This supplemental information is being transmitted in partial response to comments received on June 16, 1993, from the State of Washington Department of Ecology (Ecology) and the U.S. Environmental Protection Agency (EPA). These comments specifically addressed Chapter 3.0 (Waste Characteristics) in the 616 NRDFS and 305-B portions of the Hanford Facility Dangerous Waste Permit Application.

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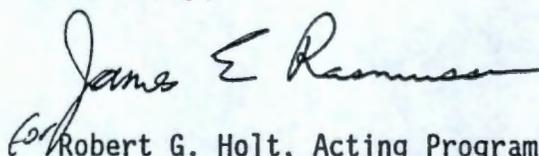
This supplemental information was prepared in accordance with verbal guidance given in a meeting held on July 28, 1993, between the U.S. Department of Energy, Richland Operations Office (RL), Westinghouse Hanford Company (WHC), Pacific Northwest Laboratory (PNL), Ecology, and EPA. In that meeting, EPA indicated that submitting waste characterization data for representative waste streams stored at the 616 NRDWSF and 305-B would be sufficient until revised waste analysis plans could be prepared at a later date. Two enclosures have been prepared to provide the information requested by EPA and Ecology at the July 28, 1993, meeting. Enclosure 1 includes certified information for the 616 NRDWSF, and Enclosure 2 includes certified information for the 305-B.

In a July 27, 1993, letter we recommended that a phased approach be taken for revision of the 616 NRDWSF and 305-B waste analysis plans. This approach was to include participation by the EPA and Ecology in the waste analysis plan development process. Such participation was to help ensure that revisions of the plans were prepared to the satisfaction of all parties. Although the waste characterization needs for the waste analysis plans were discussed at the July 28, 1993, meeting, a similar discussion has not been held on the waste analysis process portion of the plans. Until an "agreement in concept" on this process is reached, we feel that it will not be prudent to proceed with preparing revised 616 NRDWSF and 305-B waste analysis plans.

We are proposing that a concerted effort be made to formulate an "agreement in concept" prior to October 15, 1993. This agreement would serve as the basis for including 616 NRDWSF and 305-B waste analysis plan conditions in the Draft Hanford Facility Dangerous Waste Permit tentatively scheduled to be issued on November 1, 1993, for public comment. One of these conditions would also be used to establish a firm date for submittal of revised waste analysis plans for the two units. We would like to meet with your staff at the earliest possible time to discuss this approach and request that EPA and Ecology identify the appropriate contacts. Once an "agreement in concept" is reached, we will make every effort to expedite the preparation of revised 616 NRDWSF and 305-B waste analysis plans.

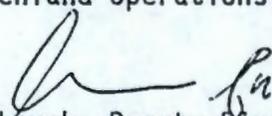
Please provide the names of the EPA and Ecology waste analysis plan contacts to Mr. C. E. Clark of RL. Should you have any questions, please contact Mr. Clark, RL, on (509) 376-9333, Mr. R. C. Bowman, WHC, on (509) 376-4876 (for 626 NRDWSF), or Mr. H. T. Tilden II, PNL, on (509) 376-0499 (for 305-B).

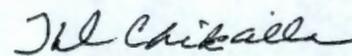
Sincerely,



Robert G. Holt, 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


T. D. Chikalla, Director
Facilities and Operations
Pacific Northwest Laboratory

Enclosures:

1. Supplemental Information to the Hanford Facility
Dangerous Waste Permit Application,
616 Nonradioactive Dangerous Waste Storage Facility (616 NRDWSF) 31713
Part B Permit Application, Revision 2,
Chapter 3.0, Waste Characteristics,
with Certification Page
2. Supplemental Information to the Hanford
Facility Dangerous Waste Permit Application, 31712
305-B Storage Unit Part B Permit
Application, Revision 2, Chapter 3.0,
Waste Characteristics, with Certification Page

cc w/encls:
Administrative Records, H6-08
D. Duncan, EPA
M. Jaraysi, Ecology
T. Michelena, Ecology

cc w/o encls:
R. Bowman, WHC
T. Chikalla, PNL
R. Lerch, WHC
D. Nylander, Ecology
S. Price, WHC
H. Tilden, PNL

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Subject: SUPPLEMENTAL INFORMATION TO THE HANFORD FACILITY DANGEROUS WASTE PERMIT APPLICATION, 616 NONRADIOACTIVE DANGEROUS WASTE STORAGE FACILITY AND 305-B STORAGE UNIT

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