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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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July 20, 1994

Mr. Steve Wisness
Mr. Jim Rasmussen
U.S. Department of Energy
P.O. Box 550
Richland, WA 99352



Dear Messrs. Wisness and Rasmussen:

Thank you for meeting with me last week to discuss the Hanford Facility Permit. I wanted to follow up on our discussion.

I believe the interaction between our offices during the last year has been fruitful. We now have a permit that sets a realistic compliance pathway. I believe the permit prescribes sound waste management practices and expedites the important closure and cleanup of non-operating waste units.

To complete our discussions, we will provide you with a three day opportunity to review the final permit in its entirety after we have incorporated the public comments. After your review, we can have one final management team meeting before we issue the permit in early August 1994. Please contact Joe Stohr at (206) 407-7107 to arrange a meeting time.

I want to reinforce that although most of the permit discussions have been with our Lacey staff, our Kennewick staff have been kept up to speed and are in agreement with our approach. The Kennewick staff will be responsible for implementing the permit once it has been issued. To aide in the transfer of responsibility from our Lacey office to our Kennewick office after permit issuance, we will conduct workshops with our headquarters and Kennewick staff and then with Hanford site personnel. These workshops are intended to provide a smooth transition.

I know this permit has been a difficult project to complete. It has been written to cover many complex operational activities at your facility, and be consistent with other permits issued to businesses throughout the state. The permit will undoubtedly change, as cleanup strategies and regulations evolve. I believe we are now ready to move forward with permit issuance and not take more time and staff resources in search of the "perfect" permit. I understand some issues have not been resolved to the satisfaction of all of the contractors (such as the inclusion of new waste analysis plans). Ecology staff will continue to work toward resolution of these issues, for possible incorporation during the next permit modification.

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We fully expect to find some permit conditions which will require formal clarification. We intend to be reasonable and use common sense and, when necessary, use the permit modification process to correct problem areas. It is our intention to modify the permit once per year until all treatment, storage, and disposal units are included. These modifications will present the opportunity to use new information to maintain a viable, practical, and environmentally protective permit.

Once again, thanks for your assistance in developing and refining this permit to reflect the reality of waste management at Hanford.

Sincerely,

Drusilla Butler

Drusilla Butler, Program Manager
Nuclear Waste Program

DB:JW:tm

cc: Dan Duncan, EPA
Jeff James, BHI
Sue Price, WHC
Harold Tilden, PNL
Administrative Record

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Correspondence No.

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Subject: HANFORD FACILITY RCRA PERMIT

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