



## Department of Energy

Richland Operations Office  
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0001127

MAY 8 1985

Mr. Marc Horton, Assistant Director  
Washington Department of Ecology  
Mail Stop PV-11  
Olympia, Washington 98504

*Handwritten:* OSI to  
C/Burkhalter  
Stanley

Dear Mr. Horton:

### HANFORD HAZARDOUS WASTE MANAGEMENT PROGRAM

The following summary describes the topics and issues discussed and agreements reached at a meeting in your office on April 30, 1985. Detailed draft meeting minutes of the meeting and a tentative agenda for the May 13 meeting are attached for your review and comment.

#### Issues:

- Part B Permit Application - Inclusion of Mixed Waste Streams
- Point of Discard/Point of Compliance

#### Agreements:

- Part A Interim Status Document Revisions by July 15, 1985.
- WDOE will discuss <sup>PENDING enforcement actions</sup> ~~and clarify environmental and legal issues~~ with DOE/RL prior to <sup>FORMAL</sup> ~~initiating enforcement actions on~~ (spills and releases).
- DOE-RL and WDOE will jointly review the candidate mixed waste streams to identify ~~the sources of perceived environmental problems and~~ <sup>priority concerns</sup> ~~regulatory conflicts~~ at a technical meeting at Hanford on May 13, 1985.
- A managerial meeting will be held one to two weeks after the May 13 meeting and identify future agency interactions and activities.

Please feel free to amend the draft of the meeting minutes as you see fit. Contact me if you wish to discuss any of the above further. I appreciate the efforts made by you and your staff in making these discussions worthwhile and fruitful.

Very truly yours,

T. R. Timmons, Assistant Manager  
for Safety, Safeguards and  
Quality Assurance

SQA:PJK

#### Attachments

1. Meeting minutes
2. Tentative agenda

## Attendees

Ted Fitzsimmons, DOE  
 Ron Gerton, DOE  
 Mike Tiernan, DOE  
 Joe Krupar, DOE  
 Paul Krupin, DOE  
 Walt Haerer, RHO

Marc Horton, WDOE  
 Lynda Brothers, WDOE  
 Don Provost, WDOE  
 Dick Burkhalter, WDOE  
 Roger Stanley, WDOE

Distribution  
 Attendees plus -

## Minutes:

- WDOE presented DOE/RL with a copy of the call-in letter to the Part B Permit Application. The call-in includes mixed waste, which the State of Washington had previously agreed to not do. *\* see response*
- DOE probably cannot comply with the mixed waste portion of the WDOE Part B Permit request until there is a resolution of the issue by EPA. DOE will work with WDOE to provide information requested in the call-in for the Part B Application.
- WDOE wants a 'cohesive interim status document' as per the 3/29/85, letter to Ron Gerton. There is a formal response coming to WDOE that details the nature of DOE/RL's position on the revisions and respective due dates.
- WDOE may take some enforcement action on the spills and releases under the Clean Water Act and the RCW 90.48. *(ENFORCEMENT actions may also cite dangerous waste regulations)* WDOE agreed to discuss and clarify pending *environmental concerns and legal issues* with DOE/RL prior to initiating *formal* enforcement action.
- DOE/RL gave presentations on the candidate mixed waste stream document, the use of cribs and soil columns and on chemical sewer management procedures.

ACTION	RESPONSIBILITY	DUE DATE
1) Part B Permit Application - Inclusion of Mixed Waste	DOE/RL	TBD
2) Resolution Point of Discard/Point of Compliance	WDOE/RL	TBD

Attendees

Distribution  
Attendees plus -

## Minutes:

- o WDOE questioned the validity of using the diversion box and ditch as the point of compliance because they are below the point of discard, and dilution may not be in accordance with the WAC. DOE responded by pointing out that the regulations allow for treatment in the facility, that the practices may be permissible and there is minimal environmental impact.
- o In the interim, WDOE and DOE will together review the waste streams and data to identify the sources of perceived environmental problems and/or streams which are in conflict with the regulations. Technical meeting to take place at Hanford on May 13, 1985. Management meeting to be arranged to review conclusions and identify future agency actions and activities.
- o New point of contact for DOE/RL is Mr. M. W. Tiernan, Deputy Director, Safety and Quality Assurance Division.

ACTION	RESPONSIBILITY	DUE DATE
3) <del>Discuss and clarify environmental concerns and legal issues with DOE/RL prior to initiating legal enforcement actions.</del> NOTIFY	WDOE	TBD
4) Review candidate mixed waste streams to identify sources of perceived environmental problems, <del>regulatory conflicts</del> and prioritize in order of <del>seriousness</del> CONCERN.	DOE/WDOE	5/13/85
5) Discuss technical conclusions and issues to confirm areas of agreement/disagreement and identify future actions and activities.	DOE/WDOE	TBD