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STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

1315 W. 4th Avenue • Kennewick, Washington 99336-6018 • (509) 735-7581

September 4, 2003

Mr. Joel Hebdon, Director  
Regulatory Compliance and Analysis Division  
Richland Operations Office  
United States Department of Energy  
P.O. Box 550, MSIN: A5-15  
Richland, Washington 99352

**RECEIVED**  
SEP 24 2003  
**EDMC**

Dear Mr. Hebdon:

Re: Letter to M. Wilson from Joel Hebdon, dated July 21, 2003, addressing the *TRANSMITTAL OF HANFORD FACILITY DANGEROUS WASTE PART A PERMIT APPLICATION, FORM 3s, FOR THE CENTRAL WASTE COMPLEX, REVISION 7 AND WASTE RECEIVING AND PROCESSING FACILITY, REVISION 4 (TSD: TS-2-4)*

The Washington State Department of Ecology (Ecology) has reviewed the Part A, Form 3s (Part A) for the Hanford Site Central Waste Complex (CWC) and Waste Receiving and Processing (WRAP) facilities. After evaluating the proposed changes, Ecology regrets to inform you that these forms will require revision. The issues identified are compiled in a Notice of Deficiency table enclosed with this letter.

In addition, once the Part A's are appropriately revised for issuance and approved, the final facility permits (Part B) once issued for both the CWC and the WRAP facilities will require modification. The modifications will be necessary to reflect the boundary change, and the function of the Accelerated Process Lines.

If you have any questions, please contact me at (509) 736-3019.

Sincerely,

Jeanne Wallace  
Environmental Specialist  
Nuclear Waste Program

JJW:nc  
Enclosures (2)

cc: (see next page)

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Mr. Joel Hebdon  
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cc w/enc: Harlan C. Boynton, FH  
Richard H. Gurske, FH  
Jeanette E. Hyatt, FH  
Dan J. Saueressig, FH  
Joel F. Williams Jr., FH  
**Administrative Records: CWC and WRAP**

cc w/o enc: Michael S. Collins, DOE  
Ellen M. Mattlin, DOE  
Todd A. Shrader, DOE  
Todd Martin, HAB  
Rick Gay, CTUIR  
Pat Sobotta, NPT  
Russell Jim, YN  
Ken Niles, Oregon



Notice of Deficiency  
Part A, Form 3's

Proposed Revision 7, dated July 16, 2003, of CWC  
And  
Proposed Revision 4, dated July 16, 2003, of WRAP

Unit	page	Comment
CWC & WRAP	General Comment	<p>The Part A, form 3's for the WRAP and the CWC were submitted with one letter. Because each envelope had an "open by addressee only" sticker, copies of the letters received by Ecology were not date stamped. This way of transmitting regulatory documents is not appropriate. The date stamp, indicating the date upon which Ecology received the transmittal, is the start date for formal review cycles imposed by the Tri-Party Agreement (TPA) and/or the Dangerous Waste regulations.</p> <p>For your convenience attached you will find a copy of the correspondence dated January 8, 2002, to Mr. James E. Rasmussen, U.S. Department of Energy from Mr. Michael Wilson, Washington State Department of Ecology. The letter addresses the issue of national security sensitive materials and the submittal of Part A permit applications. Please follow the instructions when submitting Part A, Form 3's.</p>
CWC & WRAP	General Comment	<p>Typically, letters to Mike Wilson, NWP Program Manager, include the original forms or documents which are placed in the NWP library. However the proposed Part A letter submitted contained only copies of the original Part A, Form 3's. The originals must be submitted for Ecology to proceed with processing the Part A, Form 3's.</p>
CWC & WRAP	General Comment	<p>An incorrect statement is included in the transmittal letter, "<i>Due to the Mod E Settlement Agreement being withdrawn along with the Part B permit applications withdrawal by Ecology, the Part A, Form 3s was never approved.</i>"</p> <p>The Part A, Form 3's for the WRAP (revision 3) and the CWC (revision 6) contained in the Mod E were both approved February 28, 2001. Simply submitting it with a Part B permit application which was later withdrawn does not invalidate that previously approved Part A.</p>
WRAP	General Comment	<p>Please address the proposed outside pad on which the Accelerated Processing Lines (APL) may be placed.</p>
WRAP	General Comment	<p>Describe the HVAC upgrades relevant to the management of waste in the APL's.</p>
WRAP	4-15	<p>It appears a typographical error has been corrected in revision of the Form 3. The revision of S04, revision 3 to S01, revision 4 was an appropriate correction of the storage code.</p>



WRAP	19	Two buildings 2404-WB and 2404-WC are referred to as storage buildings on page 19 of 25 in the WRAP Part A. One of the two buildings at the CWC is being modified and transferred to WRAP to accommodate the Accelerated Processing Lines (APL). The other building is to provide storage space for managing waste destined to be examined by the APL process. Describe the function of these buildings in the context of the APL. Add a discussion of the APL to Section III.C of the WRAP Form 3.
WRAP	22	Please add a number or other identifier to distinguish the main WRAP building from the other buildings. Please insert the word "glovebox" to the legend following 300, 100, 400, and 200. This will make the Part A language consistent with the pending Part B language.
WRAP	25	The interior photograph provided on page 25 is misleading. The building is depicted as an open bay storage facility when in fact the APL will be placed in the building. A facility layout should be provided consistent with the level of detail of the facility layout as for the 2336 W Building located on page 22 but indicating the location of the APL's.
WRAP & CWC		Waste code U375 deleted from line 320 of revision 3 for WRAP Form 3, and line 320 of revision 6 of CWC Form 3.  Waste code U370 was added to line 324 of page 25 of revision 4 for WRAP and line 324 of page 11 of revision 6 for CWC.  These waste codes have been changed without explanation.
CWC	2	Please add a sentence or note that the treatment specified is not to occur until the Part B, operating permit, encompasses these activities. Treatment in response to spills is deemed appropriate.
CWC	18	The flammable and alkali metal waste storage modules are not indicated as components of the CWC as depicted by the legend.
CWC	18	Please depict the injection wells located within the boundary of the unit. This information will be pertinent when the unit is closed.
CWC	18	Please indicate that the south alkali metal storage modules are part of the unit.
CWC	18	The drain sump and system depicted at the top of the diagram appear to function similar to a septic system drain field. Please describe the management of run-on/off managed by this system. Perhaps a note may clear up any ambiguity in the diagram.