



Department of Energy

Richland Field Office
P.O. Box 550
Richland, Washington 99352

9306370

DEC 09 1993

93-LWB-129

Mr. Douglas R. Sherwood
Hanford Project Manager
U.S. Environmental Protection Agency
712 Swift Boulevard, Suite 5
Richland, Washington 99352

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



9413205-1279

Dear Messrs. Sherwood and Stanley:

CHANGE REQUESTS FOR THE 200 AREA EFFLUENT TREATMENT FACILITY (ETF): HANFORD FEDERAL FACILITY AGREEMENT AND CONSENT ORDER MILESTONES M-17-14, M-17-14D, M-17-29, M-26-03, AND M-26-04

Enclosed for your approval is a Federal Facility Agreement and Consent Order (TPA) Change Control Form (Enclosure 1), for proposed Class II changes to the TPA. The proposed changes would modify the TPA Interim Milestones M-17-14, M-17-14D, and M-17-29. A change request, dated 8/19/93, was provided for your review and approval at the August 19, 1993, TPA Project Managers' meeting. The enclosed change request, dated 12/1/93, is a revision which deletes the M-26-03 and M-26-04 milestone changes. The M-26-03 and M-26-04 milestones will be modified at a later date.

At the August 19, 1993, TPA Project Managers' meeting, the State of Washington Department of Ecology (Ecology) committed to provide the U. S. Department of Energy, Richland Operations Office (RL) a schedule of their review and public comment on the environmental impacts of the ETF and Disposal Site. These reviews and public comments are being conducted to comply with the State Environmental Protection Act (SEPA).

This change of M-17-14 and M-17-29 milestones is required as a result of the delayed Ecology evaluation of the environmental significance of the operation of the ETF and disposal of the treated effluent to the State-approved land disposal site.



Messrs. Sherwood and Stanley
93-LWB-129

-2-

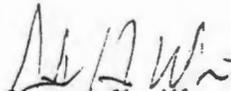
DEC 0 9 1993

The deletion of the word "operational" from M-17-14D milestones is necessary to dispel confusion over the type of test procedures required. The test procedures to be completed for facility acceptance include start-up, normal operation, demonstration of all abnormal operating conditions, safe shut-down, system flushing and decontamination. Testing will be completed using a nonradioactive surrogate solution. It is also the intent of the test procedures to demonstrate that the ETF is capable of continuous operations.

The proposed change also requires a change to Ecology Consent Order No. DE-91NM-177 for the permitting of liquid effluent discharges under Washington Administrative Code (WAC) Chapter 173-216. Enclosed is a proposed modification to the Consent Order (Enclosure 2) consistent with the TPA Change Request. Ecology is requested to provide approval for modification of the Consent Order with the approval of the TPA Change Request.

I look forward to discussing and resolving this TPA Change Request and Consent Order modification with you at your earliest possible opportunity. Should you have any questions, please contact either Mr. J. E. Rasmussen on (509) 376-2247 or Mr. D. C. Bryson (509) 372-0738, or me on (509) 376-6798.

Sincerely,

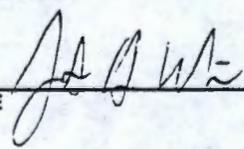

Steven H. Wisness
Hanford Project Manager

LWB:DCB
Enclosures (2)

cc w/encl:
B. A. Austin, WHC
D. J. Jansen, Ecology
D. C. Nylander, Ecology
M. Selby, Ecology

cc w/o encl:
C. C. Haas, WHC
J. J. Luke, WHC
G. T. Tebb, Ecology
G. Hoffer, EPA
J. D. Williams, WHC

9413205.1280

Change Number M-17-93-07	Federal Facility Agreement and Consent Order Change Control Form Do not use blue ink. Type or print using black ink.	Date 12/1/93
Originator Dana Bryson		Phone (509)372-0739
Class of Change <input type="checkbox"/> I - Signatories <input checked="" type="checkbox"/> II - Project Manager <input type="checkbox"/> III - Unit Manager		
Change Title Revise due date for completion of milestones M-17-14 and M-17-29.		
Description/Justification of Change Interim milestones M-17-14 and M-17-29 due dates are extended to 6/95. Interim milestone M-17-14D is revised to delete the word "Operational". The changes to the M-17-14 and M-17-29 milestones are a direct result of the Washington State Department of Ecology delay in the decision to require a State Environmental Policy Act (SEPA) public review and comment period on the 200 Area Effluent Treatment Facility (ETF) and the associated State Approved Land Disposal Site (SALDS). [Please note that the project is known as C-018H, 242-A Evaporator/PUREX Plant Condensate Treatment Facility.]		
Impact of Change The start-up of the ETF will be delayed because of the SEPA determination process.		
Affected Documents Hanford Federal Facility Agreement and Consent Order, Appendix D.		
Approvals <input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved DOE  _____ Date <u>12/1/93</u> EPA _____ Date _____ Ecology _____ Date _____		

9413205.1281

Description/Justification of Change -(continued)-

On March 30, 1990, the U.S. Department of Energy, Richland Field Office (RL) submitted a SEPA checklist to Ecology. On 1-28-93, RL transmitted the National Environmental Policy Act (NEPA) Finding Of No Significant Impact (FONSI) for the ETF to Ecology. On 2-4-93, Ecology listed the FONSI in the state SEPA Register under the Determination of Non-significance (DNS) category. This action informs the public of the existence of the NEPA documentation and the status of that documentation. On 2-4-93, RL transmitted a second SEPA checklist to Ecology, upon Ecology's request.

On March 26, 1993, in conjunction with obtaining Ecology's approval for the ETF construction start, RL outlined the need dates for other agency approvals in order to maintain the ETF construction schedule (letter no. 93-LWB-056). In this letter RL stated that Ecology's SEPA approval was needed by June 30, 1993 to avoid schedule impact.

Ecology's projected date for final SEPA approval is January 1994.

Impact of Change -(continued)-

The impact to schedule can not be determined until the result of the SEPA process is known. If the disposal method changes, the SALDS must be redesigned. Without the immediate start of construction activities on the SALDS, as currently designed, continuous full scale hot operations of the facility can not take place for any length of time due to the lack of significant storage space for the treated ETF effluent. (However, it will not be possible to initiate full scale hot operations by October 1994 (M-17-14) and complete BAT/AKART implementation for 242-A Evaporator Process Condensate by October 1994 (M-17-29).)

RL can initiate test procedures (M-17-14D) by June 1994. The word change (deletion of "Operational") will dispel confusion over the type of test procedures required.

9413205-1282

DEPARTMENT OF ECOLOGY

IN THE MATTER OF THE COMPLIANCE BY)
 United States Department of Energy)
 with Section 90.48 RCW and the)
 Department of Ecology)

MODIFICATION OF
 CONSENT ORDER
 No. DE 91NM-177

To: United States Department of Energy
 Richland Field Office
 P.O. Box 550
 Richland, WA 99352

I. MODIFICATION

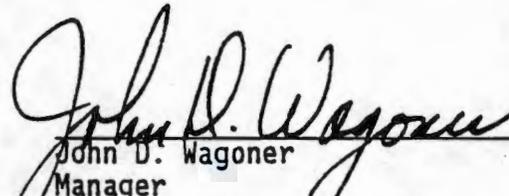
In accordance with Section IV, Page 3, of the above referenced Consent Order, the parties agree to a modification which will revise Section 3: 242-A Evaporator and PUREX Plant Process Condensate and Ammonia Scrubber Distillate Treatment Facility - Project C-018H, Table 1, 'Project C-018H Milestones' as follows:

For 'Initiate full scale hot operations with permitted discharge of treated effluent to the soil column' revise the date in the 'OTHER SUBMITTALS' column from '10/94' to '6/95'.

All other terms and conditions contained in the Consent Order remain in full force and effect.

Dated this _____ day of _____, _____, at
 Kennewick, Washington.

 Dave Nylander
 Office Manager
 Washington State Department of Ecology



 John D. Wagoner
 Manager
 U.S. Department of Energy

9413205.1283

CORRESPONDENCE DISTRIBUTION COVERSHEET

Author

Addressee

Correspondence No.

S. H. Wisness

D. R. Sherwood, EPA
R. F. Stanley, Ecology

Incoming Letter# 9306370

Subject: CHANGE REQUESTS FOR THE 200 AREA EFFLUENT TREATMENT FACILITY
(ETF): HANFORD FEDERAL FACILITY AGREEMENT AND CONSENT ORDER
MILESTONES M-17-14D, M-17-29, M-26-03, and M-26-04

INTERNAL DISTRIBUTION

Approval	Date	Name	Location	w/att
		Correspondence Control	A3-01	X
		President's Office	B3-01	
		B. A. Austin	B2-35	X
		A. J. DiLiberto	R3-46	X
		J. J. Luke	H6-25	X
		H. E. McGuire (Level 1)	B3-63	
		S. R. Moreno	B3-06	
		R. D. Morrison	B2-35	X
		D. B. Pabst	B2-35	X
		J. D. Williams	H6-32	X
		T. B. Veneziano (Assignee)	H6-32	X
		EPIC	H6-08	X
		C. K. Ross	H1-63	X



9413205-1284