

# START



## Department of Energy

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93-RPS-278

JUL 2 1993

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Hanford Project Manager  
U.S. Environmental Protection Agency  
Region 10  
1200 Sixth Avenue  
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Ms. Dru Butler, Program Manager  
Nuclear and Mixed Waste Management  
State of Washington  
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P.O. Box 47600  
Olympia, Washington 98504-7600

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Dear Mr. Hofer and Ms. Butler:

THE HANFORD FACILITY DANGEROUS WASTE PART A PERMIT APPLICATION, FORM 3 FOR THE 216-B-3 POND SYSTEM (D-2-5)

The U.S. Department of Energy, Richland Operations Office (RL) and the Westinghouse Hanford Company (WHC) are revising the Hanford Facility Dangerous Waste Part A permit application, Form 3 for the 216-B-3 Pond System treatment, storage, and disposal (TSD) unit. RL and WHC have evaluated options for immediately clean closing portions of the 216-B-3 Pond System while deferring closure of the rest of the unit. A separate Part A permit application, Form 3 will be submitted for the three expansion ponds (216-B-3A, 216-B-3B, and 216-B-3C), which will undergo clean closure. Although the three expansion ponds are physically distinct units, they will continue to operate together after the completion of clean closure. A separate Part A permit application, Form 3 will be submitted for the remaining portions of the TSD unit (216-B-3 Pond and the 216-B-3-3 Ditch), which will have closure deferred and integrated with Resource Conservation and Recovery Act (RCRA) corrective action for the 200-BP-11 Operable Unit. In a letter dated May 26, 1993, Ms. Jeanne J. Wallace, Unit Manager, State of Washington Department of Ecology (Ecology), concurred with clean closing the three expansion ponds separate from the remainder of the system. 28649

The Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) Milestone M-17-10 requires that by June 1995, RL "cease liquid discharges to hazardous waste land disposal units unless such units have been clean closed in accordance with RCRA." The expansion ponds at the 216-B-3 Pond System (216-B-3A, 216-B-3B, and 216-B-3C) are planned for continued use beyond the June 1995 date, therefore, they must be clean closed by that date. All liquid discharges into the 216-B-3 Pond System will be routed to flow into the clean closed portions of the unit prior to the June 1995 Tri-Party Agreement milestone date. RL and WHC believe that the best approach for clean closing the 216-B-3 Pond System Expansion Ponds involves changing regulatory documents to establish these units as separate from the portions of 216-B-3 Pond System that will be closed in conjunction with the 200-BP-11 Operable Unit.

Mr. Hofer and Ms. Butler  
93-RPS-278

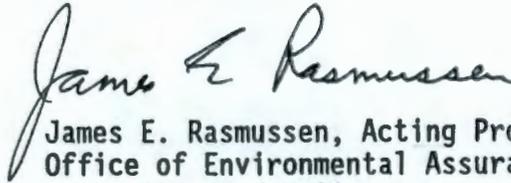
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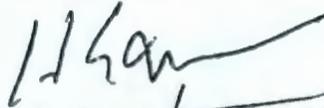
RL and WHC personnel have been working with personnel from the Kennewick Ecology office on integrating portions of the 216-B-3 Pond System with the remedial activity of the 200-BP-11 Operable Unit. A Tri-Party Agreement change request form which accomplishes this integration has already been drafted and reviewed by all parties.

RL and WHC will commence preparation of the Part A permit applications, Form 3 and will coordinate the review of the documents through the respective Unit Managers. Should you have any questions, please contact Mr. C. E. Clark, RL, on (509) 376-9333 or Ms. S. M. Price, WHC, on (509) 376-1653.

Sincerely,



James E. Rasmussen, Acting Program Manager  
Office of Environmental Assurance,  
Permits, and Policy  
DOE Richland Operations Office



R. E. Lerch, Deputy Director  
Restoration and Remediation  
Westinghouse Hanford Company

cc:  
Administrative Records (D-2-5), H6-08  
D. Duncan, EPA  
R. Lerch, WHC  
D. Nylander, Ecology  
S. Price, WHC  
F. Ruck, WHC  
D. Sherwood, EPA  
R. Stanley, Ecology  
D. Teel, Ecology  
J. Wallace, Ecology

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Subject: THE HANFORD FACILITY DANGEROUS WASTE PART A PERMIT APPLICATION, FORM 3 FOR THE 216-B-3 POND SYSTEM (D-2-5)

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