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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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August 2, 2002

Mr. Joel Hebdon, Director
Regulatory Compliance and Analysis Division
Richland Operations Office
United States Department of Energy
P.O. Box 550, MSIN: A5-58
Richland, Washington 99352

RECEIVED
AUG 07 2002
EDMC

Dear Mr. Hebdon:

Re: Letter, Joel Hebdon, USDOE, to Laura Ruud, Ecology, "Dangerous Waste Permit Application Part A, Form 3, Revision 4 for the 600 Area Purgewater Storage and Treatment Facility (PSTF)", dated March 25, 2002

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Re: Letter, Laura Ruud, Ecology, to Joel Hebdon, USDOE, "Dangerous Waste Permit Application Part A, Form 3, Revision 4, for the 600 Area Purgewater Storage and Treatment Facility," dated April 30, 2002

Re: Letter, Laura Ruud, Ecology, to Joel Hebdon, USDOE, "Dangerous Waste Permit Application Part A, Form 3, Revision 5, for the 600 Area Purgewater Storage and Treatment Facility," dated July 24, 2002

Thank you for the assistance of the U.S. Department of Energy (USDOE), Bechtel Hanford, Inc., and Fluor Hanford, Inc. personnel during the Washington State Department of Ecology's (Ecology) informational meeting and site visit on July 18, 2002. The purpose of the meeting and site visit was to gather information to assist Ecology in making a determination for a path forward for the 600 Area Purgewater Storage and Treatment Facility.

On March 25, 2002, the USDOE informed Ecology that chromium (D007) waste had been accepted at the 600 Area Purgewater Storage and Treatment Facility at levels above the dangerous waste characteristic designation level (5.0 mg/L). State regulation WAC 173-303-805 (7)(a)(i) clearly states that the owner/operator must submit a revised Part A to include new information **prior** to storage, treatment or disposal of a new constituent. These regulations establish a system for safe and responsible management of dangerous waste. Since D007 cannot be added to the Part A after acceptance and management, Ecology is proposing the following voluntary schedule for compliance at the 600 Area Purgewater Storage and Treatment Facility. In order to correct the violation identified, please complete the corrective actions within the time frames specified.

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VIOLATION

WAC 173-303-805 (7)(a)(i) - In evaluating the groundwater monitoring results for purgewater disposed into the 600 Area Purgewater Storage and Treatment Facility, it was discovered that the chromium concentrations exceeded the Toxicity Characteristic Leaching Procedure limit of 5.0 mg/L for dangerous waste designation. The purgewater Part A does not include D007 code.

CORRECTIVE ACTIONS

1. Stop accepting purgewater into modu tanks by June 30, 2003.
2. Work with Ecology to revise the existing draft closure plan by June 30, 2003.
3. Complete closure by December 31, 2003.
4. Begin physical use of the Liquid Effluent Retention Facility/Effluent Treatment Facility for purgewater by July 1, 2003.

Ecology recognizes that D007 could be identified above the required limit in future purgewater extractions. Based on the discovery that some of the waste managed in the Purgewater Storage and Treatment Facility included chromium at levels that cause the wastes to designate as dangerous waste, Ecology acknowledges the possibility that other constituents outside the Part A could also be discovered. Therefore, as long as future discoveries are documented in the closure plan and the aforementioned schedule is followed, it is Ecology's determination that the 600 Area Purgewater Storage and Treatment Facility will be allowed to continue to operate in accordance with the corrective actions identified above.

Please take the necessary action to come into compliance with the requirements, as the issuance of an administrative order is pending pursuant to authority granted under the Hazardous Waste Management Act (RCW 70.105.080 and/or .095).

Do not hesitate to contact Fred Jamison, Project Manager, at (509) 736-3022 or me at (509) 736-3025 if you have any questions regarding this letter.

Sincerely,



Greta P. Davis
Nuclear Waste Program

GD:lkd

cc: See next page

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cc: Nick Ceto, EPA
Marvin Furman, USDOE
Ellen Mattlin, USDOE
John Morse, USDOE
George Sanders, USDOE
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Administrative Record: 600 Area PSTF
Environmental Portal, LMSI