



AUG 16 2010

10-ESQ-203 (REISSUE)

CCN: 216656

Ms. Jane A. Hedges, Program Manager
 Nuclear Waste Program
 Washington State
 Department of Ecology
 3100 Port of Benton Blvd.
 Richland, Washington 99354

RECEIVED
 AUG 18 2010

EDMC

Dear Ms. Hedges:

SUBMITTAL OF "EVALUATION OF WTP SECONDARY MIXED WASTES FOR DANGEROUS WASTE TREATMENT AND DISPOSAL," 24590-WTP-RPT-ENS-10-003, REVISION 1

- References:
1. WA7890008967, "Dangerous Waste Portion of the Hanford Facility Resource Conservation and Recovery Act Permit for the Treatment, Storage, and Disposal of Dangerous Waste, Operating Unit 10, 'Waste Treatment and Immobilization Plant.'"
 2. Ecology letter from J. A. Hedges to S. J. Olinger, ORP, D. A. Brockman, RL, and W. S. Elkins, BNI, "Final Permit Decision on the 2+2 Appealed Conditions Modification of the Waste Treatment and Immobilization Plant (WTP) Dangerous Waste Permit (DWP)," dated February 20, 2009.

This letter is being reissued to correct the revision number of the subject document in the subject line and body of the letter to match the attachment.

In accordance with Permit Condition III.10.C.2.n (Reference 1), please find attached, "Evaluation of WTP Secondary Mixed Wastes for Dangerous Waste Treatment and Disposal, (24590-WTP-RPT-ENS-10-003, Revision 1)" for your review and comment and inclusion in the permit Administrative Record.

Reference 2 notified the U.S. Department of Energy, Office of River Protection and Bechtel National, Inc. (BNI) of the Washington State Department of Ecology's (Ecology) final permit decision to modify the Waste Treatment and Immobilization Plant (WTP) Dangerous Waste Permit in Part III, Operating Unit 10, of the "Hanford Facility Dangerous Waste Portion of the Resource Conservation and Recovery Act permit for the Treatment, Storage, and Disposal of Dangerous Waste (WA78900008967)." This permit modification incorporated Permit Condition III.10.C.2.n that requires the permittees submit reports regarding WTP secondary mixed waste streams by June 30, 2010. The reports are required to identify: mixed waste constituent concentrations in each waste stream per Condition III.10.C.2.n.i; appropriate Land Disposal Restriction treatment standards per Condition III.10.C.2.n.ii; those waste streams, from

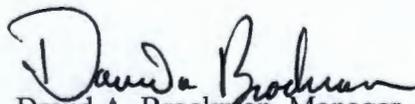
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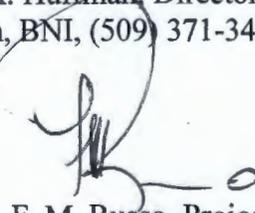
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a qualitative perspective, that reasonably may cause an environmental standard to be exceeded at the disposal facility per Condition III.10.C.2.n.iii; and potential treatment approaches to mitigate these impacts per Condition III.10.C.2.n.iv. The reports required by Conditions III.10.C.2.n.i through iv have been combined into one BNI document (Attachment). The document is based on a revised run of the process flow model conducted specific to development of information related to secondary waste at WTP, an update to information from the August 2006 mass balance previously submitted to Ecology. This was discussed in advance with your staff. Selection of treatment approaches is required by December 31, 2015, or 12 months prior to cold commissioning for the facility producing the waste (Permit Condition III.10.C.2.n.v).

The mixed wastes that are the subject of this report will not begin to be generated until approximately 2018 and, as such, this report relies on currently available information including process modeling and estimates of secondary radioactive solid waste generation. Designation of secondary wastes streams for treatment and disposal will be based on actual waste profiles developed after the wastes are being generated in accordance with Washington Administrative Code 173-303-070, "Designation of Dangerous Waste." At this time, specific waste acceptance criteria have not been established for the Hanford site Integrated Disposal Facility and the results of a performance assessment for the disposal facility are not available. Accordingly, it is not possible to definitively conclude if any waste streams may contribute to an exceedance of applicable environmental standards, and therefore the conclusions presented in this report are qualitative and subjective.

If you have any questions, please contact Lori A. Huffman, Director, Environmental Compliance Division, (509) 376-0104, or Brad G. Erlandson, BNI, (509) 371-3428.


David A. Brockman, Manager
Office of River Protection


F. M. Russo, Project Director
Bechtel National, Inc.

ESQ:LAH

Attachment

cc: See page 3

Ms. Jane A. Hedges
10-ESQ-203

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cc w/attach:

D. B. Blumenkranz, BNI
B. G. Erlandson, BNI
P. A. Fisher, BNI
R. K. Biyani, Ecology
A. S. Carlson, Ecology
S. L. Dahl, Ecology
D. McDonald, Ecology
D. Mears, Ecology
S. A. Thompson, MSA
A. C. McKarns, RL
D. J. Sommer, SCS
K. A. Colosi, WRPS
C. G. Spencer, WRPS
Administrative Record (WTP H-0-8)
BNI Correspondence
Environmental Portal, LMSI
WRPS Correspondence

cc w/o attach:

R. W. Bradford, BNI
R. E. Brown, BNI
D. M. Busche, BNI
J. H. Dunkirk, BNI
R. E. Edwards, BNI
G. F. Futrell, BNI
N. F. Grover, BNI
R. S. Hajner, BNI
R. M. Kacich, BNI
C. H. Knauss, BNI
E. D. Lee, BNI
D. G. McKenzie, BNI
D. C. Robertson, BNI
M. K. Robinson, BNI
F. M. Russo, BNI
J. A. Scarpino, BNI
A. R. Veirup, BNI
J. Cox, CTUIR
S. G. Harris, CTUIR
G. P. Davis, Ecology
G. P. Bohnee, NPT
K. Niles, Oregon Energy
S. R. Weil, RL
R. Jim, YN