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STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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

September 11, 1995

Mr. James E. Rasmussen, Director  
Environmental Assurance, Permits and Policy Division  
U.S. Department of Energy  
P.O. Box 550  
Richland, WA 99352

Mr. Kenneth C. Brog, Director  
Environmental Safety and Health  
Pacific Northwest Laboratories  
P.O. Box 999  
Richland, WA 99352



Dear Messrs. Rasmussen and Brog:

Re: Regulation of "Simulated Waste"

The Washington State Department of Ecology (Ecology) is conducting an inspection at various U.S. Department of Energy facilities operated by Pacific Northwest Laboratories (PNL) as part of the procedural closure process for Thermal Treatment Test Facilities and Physical/Chemical Test Facilities. During this inspection, questions have arisen as to management requirements for simulated waste streams. After researching this issue, I offer the following guidance:

Simulated waste is created using prescribed chemical constituents for the purpose of performing treatability tests. This material is not considered a dangerous waste, but rather should be managed as product. Resultant waste streams, i.e., those created as a result of applied treatment, are subject to conditions of Chapter 173-303 WAC. Simulated waste cannot be created using actual dangerous waste. If dangerous waste is used to create a simulated waste, the entire mixture is subject to conditions of Chapter 173-303 WAC.

The above guidance supersedes Ecology's April 30, 1990, letter on management of simulated waste used during a pilot-scale underground tank in-situ vitrification (ISV) test. 8877

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Further, the material used to perform the referenced ISV test is not deemed a solid waste at the onset of the test. However, as noted above, waste streams resulting from applied treatment are subject to conditions of Chapter 173-303 WAC.

Do not hesitate to call me at (509) 736-3019 if you have any questions regarding this letter.

Sincerely,



Jeanne Wallace, Unit Manager  
Nuclear Waste Program

JW:sl

cc: Cliff Clark, USDOE  
Bob DeLannoy, USDOE  
Bet Flores, PNL  
Mike Schlender, PNL  
Harold Tilden, PNL