



U.S. Department of Energy  
**Office of River Protection**

P.O. Box 450, MSIN H6-60  
Richland, Washington 99352

AUG 19 2005

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05-ED-063

Mr. Michael A. Wilson, Program Manager  
Nuclear Waste Program  
State of Washington  
Department of Ecology  
3100 Port of Benton Blvd.  
Richland, Washington 99352

RECEIVED  
AUG 23 2005

EDMC

Dear Mr. Wilson:

IMPLEMENTATION OF THE STATE OF WASHINGTON, DEPARTMENT OF ECOLOGY (ECOLOGY) DECISION TO ELIMINATE DANGEROUS WASTE PERMIT-VERSION DOCUMENTS FOR THE WASTE TREATMENT AND IMMOBILIZATION PLANT (WTP) DANGEROUS WASTE PERMIT

Reference: Ecology letter from S. Dahl to R. J. Schepens, ORP, and J. P. Henschel, BNI, "Elimination of Permit-Version Documents for the Waste Treatment Plant (WTP) Dangerous Waste Permit," dated July 6, 2005.

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In the Reference, Ecology informed the U.S. Department of Energy, Office of River Protection (ORP) and Bechtel National, Inc. (BNI) that Ecology would no longer accept permitting documents that are different from the source documents used for construction of the Hanford Tank WTP. The permit documents are essentially identical to the source documents, except that information the Permittees believe is non-permit affecting is shown in lighter "phantom" print (i.e., ghosted) and some of the notes and references have been deleted. The Ecology letter was prompted by the failure to incorporate relevant design and other information into the WTP permit and included five elements Ecology believed would accomplish a smooth transition. The key elements were the reestablishment of the initial permit document meeting whereupon all parties would agree upon what documents will be submitted as part of the permit package, and the availability of all source drawings and documents related to the permit submittal for possible inclusion in that permit package and/or modification. The remaining elements suggested methods and timeframes for transitioning existing permit documents to source documents.

Subsequently, at the July 14, 2005, ORP, BNI, and Ecology management Brown Bag meeting, ORP and BNI proposed the alternative approach below that could be used to mitigate Ecology's concerns:

1. The practice of identifying non-permit affecting design elements by ghosting and permit affecting design elements by bolding would continue;
2. Portions of the design in contact with dangerous waste would be bolded;



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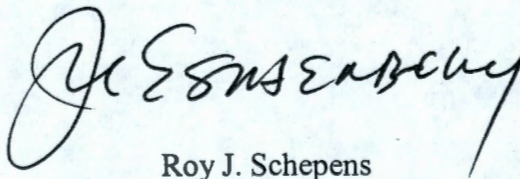
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3. Prior to or during Ecology's informal review of permit packages or modifications, a meeting would be held to understand BNI's proposal for identifying design elements as permit affecting;
4. All comments resulting from the informal review will be resolved prior to submittal of the permit package and/or modification; and
5. Design elements ghosted by BNI but considered permit affecting by Ecology would subsequently be identified as bolded.

This letter confirms the above alternative approach agreed to by those in attendance at the July 14, 2005, Brown Bag meeting.

If you have any questions, please contact me, or your staff may contact Woody Russell, Environmental Division, (509) 373-5227.

Sincerely,



Roy J. Schepens  
Manager

ED:RWR

cc: See page 3





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cc: B. G. Erlandson, BNI  
J. P. Henschel, BNI  
R. E. Lawrence, BNI  
J. Markillie, BNI  
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B. Becker-Khaleel, Ecology  
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