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Department of Energy

Incoming 9401784

Richland Operations Office
P.O. Box 550
Richland, Washington 99352

MAY 09 1994

94-RPS-215

Mr. Douglas R. Sherwood
Hanford Project Manager
U.S. Environmental Protection Agency
712 Swift Boulevard, Suite 5
Richland, Washington 99352

Mr. Roger F. Stanley
Hanford Project Manager
State of Washington
Department of Ecology
P.O. Box 47600
Olympia, Washington 98504-7600



Dear Messrs. Sherwood and Stanley:

REQUEST FOR RELIEF FROM NOTICE OF INTENT PROCESS FOR REVISION OF THE HANFORD FACILITY DANGEROUS WASTE PART A PERMIT APPLICATION, FORM 3, FOR THE SINGLE-SHELL TANK SYSTEM (TSD: S-2-4)

Efforts have been initiated to revise the Hanford Facility Dangerous Waste Part A Permit Application (Part A), Form 3, for the Single-Shell Tank (SST) System to support the mission of retrieving the floating organic layer from Tank 241-C-103. The current Part A covers both tank storage (S02) and tank treatment (S01) of mixed waste contained within the SST System. The addition of a new treatment code, T04, is required to allow the retrieval and separation of the organic layer from the entrained aqueous layer. The addition of a new storage code, S01, is also required to allow greater than 90 day container storage of the retrieved organic.

At the April 12, 1994, SST System Unit Managers' meeting, the subject of retrieving the organic waste contained within Single-Shell Tank 241-C-103 was presented. It was agreed that the Part A permit application should be revised, but the State of Washington Department of Ecology (Ecology) did not make an immediate determination as to the need for a Notice of Intent (NOI). The U.S. Department of Energy, Richland Operations Office (RL) and Westinghouse Hanford Company formally request approval to add these treatment and storage codes to the SST Part A Permit Application without going through the NOI process identified in the Washington Administrative Code 173-303-281. Please provide a response to this request by May 30, 1994.

The effort to remove organics from within the SST System supports closure activities and is identified in the Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) under Milestone M-40-04. Relief from the NOI process will more appropriately reflect the intent of the effort to be made at the SST System. The intent is to provide operation of the treatment process only in support of closure and to provide storage until appropriate disposition for the waste organic can be identified. The public review normally associated with the NOI process was previously conducted as part of the recent Tri-Party Agreement negotiations.

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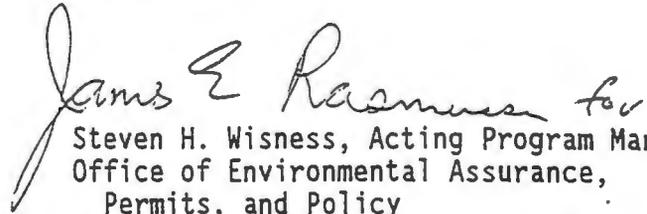
Messrs. Sherwood and Stanley
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Should you have any questions regarding this transmittal, please contact Mr. C. E. Clark of RL on (509) 376-9333 or Mr. R. C. Bowman of WHC on (509) 376-4876.

Sincerely,


Steven H. Wisness, Acting Program Manager
Office of Environmental Assurance,
Permits, and Policy
DOE Richland Operations Office

EAP:CEC


W. T. Dixon, Manager
Regulatory Support
Westinghouse Hanford Company

cc: R. C. Bowman, WHC
W. T. Dixon, WHC
M. N. Jaraysi, Ecology
G. C. Hofer, EPA
S. M. McKinney, Ecology
S. M. Price, WHC
Administrative Records, H6-08

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CORRESPONDENCE DISTRIBUTION COVERSHEET

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Correspondence No.
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 Xref 9452835D

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