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STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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April 30, 1990



Mr. Ronald E. Gerton, Director  
Waste Management Division  
U.S. Department of Energy  
P.O. Box 550  
Richland, Washington 99352

Re: Pilot-Scale Underground Tank In Situ Vitrification (ISV) Test

Dear Mr. Gerton:

The Department of Ecology has reviewed the information letter of April 19, 1990, from the Department of Energy (USDOE) regarding the pilot-scale underground tank ISV test. This information was requested by Ecology in order to respond to a telephone request by Pacific Northwest Laboratories (PNL) for guidance on the regulation of this test under the state Dangerous Waste Regulations, Chapter 173-303 WAC.

Ecology has determined that the materials used in this test will designate as dangerous waste. This is based on the materials meeting two criteria. First, they will be solid waste pursuant to WAC 173-303-016(4)(c) which states, "materials are solid waste if they are abandoned by being ... treated ... before ... being disposed of." And second, because of the materials' composition they will meet the criteria for dangerous waste under WAC 173-303-084, dangerous waste mixtures.

Because the materials will designate as dangerous waste, these tests are subject to regulation under Chapter 173-303 WAC. Examination of the information provided has shown that these tests fall within the criteria of the Interim Status Part A Permit for Thermal Treatment Test Facilities. Therefore, the proposed simulated underground waste tank ISV tests will be regulated by Ecology under this Part A Permit.

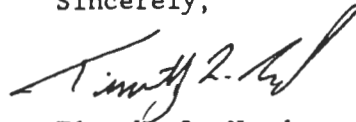
It is understood that the vitreous mass produced in these studies will be designated under WAC 173-303-070. Ecology will be replacing EP TOX with Toxic Characteristic Leach Procedure (TCLP) in the next revision of the Dangerous Waste Regulations, Chapter 173-303 WAC. It would be informative to include both of these analyses in the sampling scheme to enable comparison with both past EP TOX data and future TCLP data.

I would also like to express my appreciation of how forthcoming USDOE and PNL have been in keeping Ecology informed about the progress of

Ronald E. Gerton  
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these ISV tests as well as the opportunity for both review and comment on proposed work plans. If you have any questions concerning this matter, please contact Ms. Megan Lerchen of my staff at (206) 438-3089.

Sincerely,

A handwritten signature in dark ink, appearing to read "Timothy L. Nord", with a stylized flourish at the end.

Timothy L. Nord  
Project Manager

cc: Paul T. Day  
Marvin J. Furman  
Megan E. Lerchen  
Jack Waite  
AR

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<b>Author</b>	<b>Addressee</b>	<b>Correspondence No.</b>
T. L. Nord, Ecology	R. G. Gerton, DOE-RL	9002029

**Subject:** Pilot-Scale Underground Tank In Situ Vitrification (ISV) Test

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