



# START

## Department of Energy

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93-SWT-378



Mr. M. F. Gearheard, Chief  
Waste Management Branch  
U.S. Environmental Protection Agency  
Region 10  
1200 Sixth Avenue  
Seattle, Washington 98101

Mr. D. B. Jansen, P.E.  
Hanford Project Manager  
State of Washington  
Department of Ecology  
Post Office Box 47600  
Olympia, Washington 98504-7600

Dear Messrs. Gearheard and Jansen:

### COMMENTS ON 1993 LAND DISPOSAL RESTRICTIONS REPORT

Reference: Letter, M. F. Gearheard, EPA, to J. M. Hennig, RL, "Submittal of the M-26-1 Milestone Report, EPA ID # WA7 89000 8967," HW-106, dated July 7, 1993.

Enclosed are responses to the U. S. Environmental Protection Agency's comments on the "1993 Report on Hanford Site Land Disposal Restrictions for Mixed Waste" (Milestone M-26-1). These comments were received by the reference letter.

Using the same approach as was accepted last year, we plan to incorporate these changes into the 1994 Land Disposal Restrictions report.



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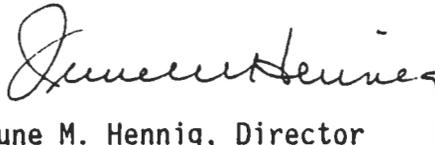
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Messrs. Gearheard and Jansen  
93-SWT-378

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Please address any questions that you may have on this subject to  
Mr. R. F. Guercia of my staff on (509) 376-5494.

Sincerely,



June M. Hennig, Director  
Waste Management Division

WMD:DWC

Enclosure

cc w/encls:  
D. Black, WHC  
D. Duncan, EPA  
D. Jansen, Ecology  
M. McCarthy, WHC  
J. Skolrud, WHC  
B. Wiese, EPA  
S. Wisness, DOE

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Responses to July 7, 1993, U.S. Environmental Protection Agency  
Comments on 1993 Land Disposal Restrictions Report

This attachment details the changes that will be made in the 1994 Land Disposal Restrictions (LDR) report due to the U.S. Environmental Protection Agency (EPA) comments on the 1993 report.

General Comments

The following general comments will be incorporated into the April 1994 LDR Report update, as discussed in the EPA comments:

- Include specific schedules for LDR variance submittals.
- Include a crosswalk that will correlate inventory data between the Waste Isolation Pilot Plant no-migration variance petition, November 1991 case-by-case application for extension of the effective date of mixed waste treatment standards, and the April 1993 Federal Facility Compliance Act submittal. This will be an appendix to the report.

Other items listed under the EPA's general comments were also covered under EPA's specific comments and are included below.

Specific Comments

The numbers used below correspond to the 13 specific EPA comments in the order given in the EPA letter. (Only the first comment was numbered in the July 7, 1993, EPA comments). The text of the EPA comment is given, followed by the DOE response.

1. Section 1.2, page 1-3, fourth bullet

This item does not fully address the comments made by EPA in April 1992 since it omits discussion of the results of the dispute resolution process on Milestone M-14-00. [In] order to address EPA's comment, the bullet should be amended to read as follows:

Complete construction and initiate operation of a low-level mixed waste laboratory by January 1992 (M-14-00). RL has decided to use off-site laboratory support for low-level mixed waste analysis and thereby did not meet this milestone. A participant in the dispute resolution process on Milestone M-14-00, RL agreed to a \$100,000 penalty. It was also determined that it must be demonstrated that analysis needs can be satisfied using a combination of commercial on-site laboratory capacity and a downsized on-site laboratory currently under construction.

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Response: Accept. It is correct that the comment was not properly incorporated per EPA's 1992 comments. This section of the report lists the current Tri-Party Agreement milestones that are related to management of Land Disposal Restricted waste. The wording above, or equivalent wording having the same factual content, will be included in the 1994 report. (This comment should have referred to the eighth bullet rather than the fourth bullet).

2. Section 1.2, page 1-4, seventh bullet:

This bullet still does not state that liquid waste from SSTs will continue to be transferred to double-shell tanks (DSTs), as space is available. This comment was made in EPA's 1992 review and must be addressed.

Response: Reject. This information has already been added as a separate bullet in the 1993 report as the first bullet on page 1-5 (under assumptions with respect to the generation and treatment of DST waste and the use of tank space).

3. Section 3.1.1.1.2, page 3-2, second paragraph:

It should be stated that characterization by analysis of plutonium finishing plant liquid waste that is to be transferred to DSTs is now a requirement based on comments provided by EPA.

Response: Accept. This characterization requirement will be noted in the 1994 report.

4. Section 3.1.2.3, page 3-5, second paragraph:

In the middle of the second paragraph, there is a discussion on testing waste for ignitability. This ignitability characterization should be based on EPA's decisions on emergency third third rules which were published on May 24, 1993. These discussion[s] clarify ignitability and corrosivity characterizations. This discussion should note that the applicability of the third third rules will be reevaluated based on EPA's decisions.

Response: Accept. The most up-to-date information at the time the 1994 report is prepared will be included. (The 1993 report was published before this "Interim Final Rule" took effect). The rule covers treatment of wastes designated as ignitable or corrosive and does not directly cover characterization requirements. (Proper characterization is required to determine if the treated wastes meet the treatment standards.)

5. Section 3.1.6, page 3-10, second bullet:

The paragraph states that treatment schedules will be incorporated into the Federal Facility Agreement and Consent Order (FFACO) when they are approved. These schedules must also be incorporated into this report.

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Response: Accept. Schedules based on the current agreement will be included.

6. Section 3.2.1, page 3-111, first paragraph:

This section of the report states that the PUREX Plant received official notification to begin shutdown, but the waste volumes to be generated during this process are not quantified. The volume of wastes that will be generated from the PUREX Plant from January 1, 1993 until its closure must be estimated and included in the report.

Response: Accept. Deactivation planning for the PUREX Plant is currently underway. The waste volumes are expected to be a part of the report. Current planning information will be included in the LDR report. (The comment reference page should have been 3-11).

7. Section 3.3.3.3, page 3-18:

This section discusses the liquid released to the soil column from the SSTs, but the volumes of liquid or solid wastes are not estimated. If these estimates are available in the waste analysis plans, they must be stated here. If no estimates are available, that should be stated and a process for obtaining such estimates should be described.

Response: Accept. Additional information on quantities of waste released to the soil column will be included.

8. Section 3.6.2.5, page 3-31:

The characterization of this waste as corrosive may depend on EPA's third third emergency rule decision, and should be reviewed against this decision. Any changes should be documented in the report.

Response: Accept. (See response to comment #4).

9. Section 3.11.4.3, page 3-49:

Since there is no schedule for treatment of the wastes associated with PUREX storage tunnels 1 and 2, an estimated schedule should be developed based on the PUREX plant closure document.

Response: Accept. The closure plan, M-20-24, is scheduled for completion in July 1995. This plan will contain additional information on the schedule for waste treatment. The 1994 LDR report will note that this is the case.

10. Section 3.12.1, page 3-50, sixth paragraph:

The section provides no information on the volumes of lead that would be generated by the PUREX plant during standby. This information should be included in the report.

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Response: Accept. Similar to the response to Comment 6, deactivation plans currently being prepared will address future lead waste quantities. This planning information will be included in the 1994 LDR report. Also, this section will be corrected to note that PUREX is now in shutdown rather than standby.

11. Section 3.14.3.3, page 3-67, third paragraph:

This section discussed the installation of 81 monitoring wells by February 1993. Some discussions should be included about characterization of the drill cuttings and pump test and purge water from these wells.

Response: Accept. Text will be added.

12. Table 3-7, page T3-7.3, footnotes:

These footnotes contain information about the volumes of cooling water that may have been added to the SST's. This information should be included in the discussion of SSTs, Section 3.3.

Response: Accept. The estimates of cooling water volume will be added to the text.

13. Section 4.4, page 4-4:

Washington Department of Ecology's TIM [Technical Information Memorandum No. 86-3] (both the adopted and draft versions) should be added here.

Response: Accept. The reference will be added to the list of LDR-relevant regulations.

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# CORRESPONDENCE DISTRIBUTION COVERSHEET

Author	Addressee	Correspondence No.
J. M. Hennig, RL (D. G. Black, WHC)	M. F. Gearheard, EPA D. B. Jansen, Ecology	Incoming 9305055 Xref 9304669B R1

Subject: COMMENTS ON 1993 LAND DISPOSAL RESTRICTITONS REPORT

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Attachment is the same as letter 9304669B R1



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