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Department of Energy

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94-RPS-003

OCT 29 1993

Ms. Dru Butler, Program Manager
Nuclear and Mixed Waste Program
State of Washington
Department of Ecology
P.O. Box 47600
Olympia, Washington 98504-7600

Mr. Douglas R. Sherwood
Hanford Project Manager
U.S. Environmental Protection Agency
Region 10
712 Swift Boulevard, Suite 5
Richland, Washington 99352



94-327-001

Dear Ms. Butler and Mr. Sherwood:

RESEARCH, DEVELOPMENT, AND DEMONSTRATION PERMITTING STRATEGY

Successful remediation of the Hanford Site depends upon the aggressive development and implementation of innovative technology. The purpose of this letter is to transmit documentation pertinent to the development of a Research, Development, and Demonstration (RD&D) permitting strategy that will support this critical need. This documentation is an outgrowth of discussions initiated with the U.S. Environmental Protection Agency (EPA) and the State of Washington Department of Ecology (Ecology) at a meeting held in Richland, Washington, on January 22, 1993. This transmittal also fulfills a commitment made in Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) Change Control Form M-20-92-7 to provide draft RD&D permitting strategy documentation for the Hanford Site by September 30, 1993. Both EPA and Ecology representatives have been kept apprised of the development of this transmittal through status meetings held on June 10, 1993, July 16, 1993, and August 17, 1993. Ecology also agreed in a telephone conversation that the document could be submitted after the September 30 due date to allow time for correction of some minor errors and completion of the concurrence process.

The submittal consists of the following items:

- Summary of Initial Recommendations (Enclosure 1)
- Volume 1: Initial Conclusions and Recommendations (Enclosure 2)
- Volume 2: Resource Conservation and Recovery Act (RCRA) Permitting Options Brief (Enclosure 3)
- Volume 3: Pacific Northwest Laboratory (PNL) Technology Summaries and Database Reports (Enclosure 4)
- Volume 4: Westinghouse Hanford Company (WHC) Technology Summaries and Database Reports (Enclosure 5)

The Summary of Initial Recommendations (Enclosure 1) is based on an ongoing phased effort that was initiated with a survey of RD&D activities currently underway or planned for the coming years. Based on this survey, technology summaries and database reports of the technologies were developed (Enclosures 4 and 5). In addition, the contents of a RCRA Permitting Options Brief (Enclosure 3) were used to evaluate the option which "best fit" a particular technology. This evaluation also resulted in the identification of impediments to option implementation. These impediments, and recommended solutions for alleviating them, are addressed in Enclosure 2.

The information contained in the transmittal is necessarily tentative because of the inherent uncertainties associated with experimental variables, outcomes of competing projects, and funding. This information is, therefore, a snapshot in time, not a depiction of the certain future. However, the results of this effort clearly show the difficulty of describing RD&D activities with the detail, specificity, and certainty necessary for a Part B permit application. The results also serve to identify concerns with other available permitting options. For this reason, we are requesting that EPA and Ecology enter into an aggressive effort with DOE-RL and its contractors to address technology permitting needs. To support this recommendation, we are requesting:

- Expeditions response to the initial conclusions and recommendations so that positive steps to develop and implement the permit strategy can be taken during the last months of 1993.
- Comments regarding any and all of the materials included in this draft final report, including requests for clarification and/or additional information and directions regarding the implementation of specific options above and beyond those addressed in the above paragraph.
- Designation of EPA and Ecology individual points of contact who can dedicate time to working with us in developing workable RD&D technology permitting approaches.

Responses to these requests will enable us to:

- Embark on specific direction based upon responses to the initial conclusions and recommendations.
- Carry out overall integration of the permit strategy, including combination of activities under consolidated permit applications, where appropriate.
- Evaluate TPA milestones and judicious proposals for elimination or addition of milestones, if necessary.
- Maintain a cooperative dialogue with EPA and Ecology that will enable us to accelerate progress.

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We look forward to your response to our requests so that we may more fully develop and finalize a Hanford Site RD&D permitting strategy. We seek to continue the process of dialogue and cooperation between our staffs to aggressively identify and apply practical working solutions that will meet the Hanford remediation challenge.

Should you have any questions, please contact Mr. C. E. Clark, RL, on (509) 376-9333, Mr. R. D. Quinn, PNL, on (509) 372-4215, or Ms. S. M. Price, WHC, on (509) 376-1653.

Sincerely,

James D. Bauer

James D. Bauer, Program Manager
Office of Environmental Assurance,
Permits, and Policy
Richland Operations Office

EAP:CEC

J. D. Spencer

J. D. Spencer, Senior Director
Environmental Restoration and Waste
Management Directorate
Pacific Northwest Laboratory

R. E. Lerch

R. E. Lerch, Deputy Director
Restoration and Remediation
Westinghouse Hanford Company

Enclosures (5)

cc w/encls:

D. Duncan, EPA
D. Jansen, Ecology
T. Michelena, Ecology
T. Tebb, Ecology

cc w/o encls:

R. Lerch, WHC
D. Nylander, Ecology
D. Sherwood, EPA
C. Sikorski, EPA
J. Spencer, PNL

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CORRESPONDENCE DISTRIBUTION COVERSHEET

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Subject: RESEARCH, DEVELOPMENT, AND DEMONSTRATION PERMITTING STRATEGY

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