



Department of Energy

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

8902708

Mr. Terry Husseman
State of Washington
Department of Ecology
Mail Stop PV-11
Olympia, Washington 98504-8711

Mr. Charles E. Findley
U.S. Environmental Protection Agency
1200 Sixth Avenue
Seattle, Washington 98101

Dear Messrs. Husseman and Findley:

REQUEST FOR FACILITIES TO BE MANAGED AS TREATMENT BY GENERATORS
MILESTONE NUMBER M-20-46

The U.S. Department of Energy, Richland Operations Office (DOE-RL) and Westinghouse Hanford Company (WHC) request that treatment activities in the following interim status units:

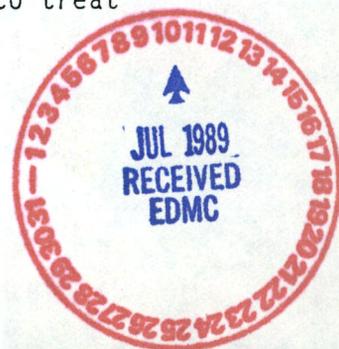
T Plant Treatment Tank,
241-Z Treatment Tank,
222-S Treatment Tank,
PUREX Treatment Tanks, and
204-AR Waste Unloading Station,

be allowed under generator status.

On March 24, 1986, the U.S. Environmental Protection Agency (EPA) published amendments to the federal hazardous waste generator requirements. In the preamble discussion, EPA stated that:

"Of course, no permitting would be required if a generator chooses to treat their hazardous waste in the generator's accumulation tanks or containers in conformance with the requirements of 262.34 and Subparts J or I of Part 265."

In response to EPA's determination, the Washington State Department of Ecology (Ecology) issued a Technical Information Memorandum (TIM), Number 86-3, "Treatment by Generators." This TIM contained the criteria that Ecology has stated they would use when determining when to allow a generator to treat his waste.



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One of the criteria requires compliance with applicable generator management standards, in Washington Administrative Code 173-303-200. These standards are a subset of the interim status requirements for dangerous waste management. Environmental Self Assessments of each of these facilities identified actions required with respect to some of the interim status and generator standards. These environmental self assessments, along with schedules for completion of actions required, were transmitted to EPA and Ecology on April 28, 1989, in fulfillment of Hanford Federal Facility Agreement and Consent Order (Agreement) Milestone M-21-00. Hanford will complete actions required at these facilities pursuant to target dates and milestones established under the Agreement Milestone M-22-00. When these five treatment units have been transferred to generator status, we will continue to complete those actions required associated with generator standards under Milestone M-22-00.

The information enclosed describes each of these tank systems and demonstrates that the treatment processes meet Ecology's criteria for treatment by generator.

If you have any questions regarding this request for treatment by generator status, please contact Mr. D. L. Duncan of DOE-RL on (509) 376-9333 or Ms. C. J. Geier of WHC on (509) 376-2237.

Sincerely,



R. D. Izatt, Director
Environmental Restoration Division
Richland Operations Office

ERD:DL D



R. E. Lerch, Director
Environmental Division
Westinghouse Hanford Company

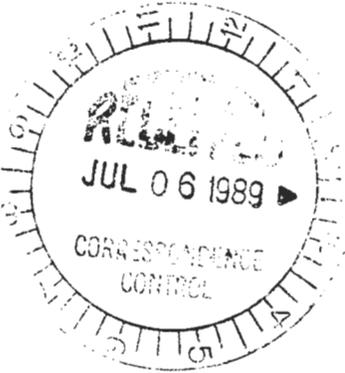
Enclosure:
As stated

cc w/encl:
P. J. Day, EPA
C. J. Geier, WHC
R. E. Lerch, WHC

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