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Department of Energy

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

OCT 08 1992

92-SWT-440



Mr. Paul T. Day
Hanford Project Manager
U.S. Environmental Protection Agency
712 Swift Boulevard, Suite 5
Richland, Washington 99352

Dear Mr. Day:

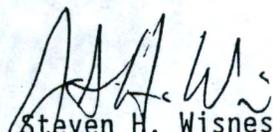
CHANGES TO 1992 LAND DISPOSAL RESTRICTIONS REPORT

- References:
- (1) "1992 Report on Hanford Site Land Disposal Restrictions for Mixed Wastes," DOE/RL-92-15, dated April 1992 *21094*
 - (2) Letter from S. H. Wisness, RL, to P. T. Day, EPA, same subject as above, dated August 3, 1992. ✓

The enclosure to this letter contains changes to the 1992 Land Disposal Restrictions Report (LDR) (Reference 1) that is intended to be kept with your copy of the report. These changes are consistent with EPA acceptance of the proposed method of incorporation of the comments (Reference 2). These changes, updated as required, will be incorporated into the 1993 LDR report scheduled to be issued in April 1993.

Please address any questions that you have on this subject to R. F. Guercia of the Waste Management Division on (509) 376-5494.

Sincerely,


Steven H. Wisness
Hanford Project Manager

WMD:RFG

Enclosure

cc w/encl:
G. W. Jackson, WHC
J. O. Skolrud, WHC
D. B. Jansen, Ecology



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Changes to "1992 Report on Hanford Site Land Disposal Restrictions
for Mixed Wastes," DOE/RL-92-15, April 1992, Resulting From
U.S. Environmental Protection Agency Comments

This enclosure has been provided to the entire distribution of the 1992 Land Disposal Restrictions (LDR) Report and is intended to be kept with the receiver's copy of the report. The changes as listed below, or as updated, will be incorporated into the April 1993 LDR Report.

The numbering of the changes below follows the numbering of the Environmental Protection Agency (EPA) comments on the 1992 LDR Report and subsequent U.S. Department of Energy, Richland Field Office responses. (Refer to the cover letter of this enclosure for references). Missing numbers in the list below occur where action on the comment was deferred or the comment required no action.

2. Section 1.2, Pages 1-3 and 1-4, Assumptions.

The eighth assumption, related to the laboratories, is amended to:

- Complete construction and initiate operations of a low-level mixed waste laboratory by January 1992 (M-14-00). RL has decided to use offsite laboratory support for low-level mixed waste analysis and thereby did not meet this milestone. As a result of the dispute resolution process on Milestone M-14-00, RL agreed to a \$100,000 penalty and must demonstrate that analysis needs can be satisfied using a combination of commercial onsite laboratory capacity and a downsized onsite laboratory currently under construction.

The fourth assumption under double-shell tank (DST) waste will be deleted as it is no longer needed. A new assumption for single-shell tanks (SSTs) and DSTs is added to the end of the section as follows:

- Liquid waste from SSTs will continue to be transferred to DSTs, as space is available, as part of the stabilization and isolation program for the SSTs.

4. Section 2.4.4, Page 2-7, 242-A Evaporator Process Condensate

The following text is added to Section 2.4.4:

There is a research, development and demonstration permit in work which is intended to permit the testing of the proposed treatment technologies on actual waste from the 242-A Evaporator when it becomes available. This permit is currently in preparation by EPA Region 10 and is scheduled to be issued in October 1992. The permit will allow testing of actual 242-A feed at the 1706-KE Facility in the 100 Area at the Hanford Site.

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6. Section 2.6, Page 2-11, Case-by-Case Extensions

The paragraph in the report is revised as follows:

The national capacity variance for Third-Third Waste (55 FR 22520) provided for a two-year national capacity variance from the LDR for third-third mixed waste expiring on May 8, 1992. This variance allowed continued storage of these wastes. A Federal Register notice granting U.S. Department of Energy (DOE) a case-by-case extension for mixed waste was signed on May 7, 1992. This extension allows DOE to store LDR mixed wastes until May 8, 1993, and this date can be extended for up to one additional year. In the event that sufficient treatment capacity for this waste is not available at the expiration of this extension, the Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) will allow continued storage of this waste until sufficient treatment capacity is available in accordance with the schedules in the Tri-Party Agreement.

7. Table 2-1, Page T2-1, Summary of Annual Waste Generation Projections.

The "to be determined" (TBDs) in the table for PUREX streams are changed to zeros for the year 1992. Add the following note to the end of the table: "The generation projections for these streams are TBDs for the future years because the generation rate depends on the need to move failed equipment containing mercury, lead, and/or silver into long-term storage." The existing note at the bottom of the table is deleted.

8. Table 2-4.1, Page T2-4.2, Storage Unit Characteristics.

The references to footnote "e" in Table 2-4.1 should be to "c."

9. Table 2-5, Page T2-5.2, Stored Waste Characteristics.

Add "SST" waste to the footnote in addition to DST.

10. Table 2-6, Page T2-6.13, Treatment of LDR Waste for Disposal.

Footnote "f" is modified to read that "The assumption is made that no treatment is required as Waste Isolation Pilot Plant is expected to operate under a no-migration petition."

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11. Section 3.1.1.1.2, Page 3-2, Plutonium Finishing Plant (PFP).

A table for PFP radioactive effluent stream compositions is included with this enclosure and is added to Section 3.0. The stream volumes and concentrations are estimated values based on process knowledge. Characterization by analysis of PFP waste to be transferred to DSTs is now a requirement. Two batches of waste have been characterized to date, but complete results are not yet available.

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CORRESPONDENCE DISTRIBUTION COVERSHEET

Author	Addressee	Correspondence No.
S. H. Wisness, RL D. G. Black, WHC	P. T. Day, EPA	Incoming: 9206596

Subject: CHANGES TO 1992 LAND DISPOSAL RESTRICTIONS REPORT

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