



NOV 13 2006

06-ESQ-161

Mr. Jay Manning, Director
Washington State
Department of Ecology
P.O. Box 47600
Olympia, Washington 98504

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Dear Mr. Manning:

WASTE TREATMENT AND IMMOBILIZATION PLANT DANGEROUS WASTE PERMIT
COMPLIANCE SCHEDULE ITEM 18

- References:
1. ORP letter from R. J. Schepens and J. P. Henschel, BNI, to J. Hedges, Ecology, "Waste Treatment and Immobilization Plant (WTP) Dangerous Waste Permit Compliance Schedule," 06-WTP-011, dated February 1, 2006.
 2. Ecology letter from S. Dahl to R. J. Schepens, ORP, and J. P. Henschel, BNI, "Leak Detection and Waste Removal Capability in the Pretreatment Facility," dated June 8, 2005.

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This letter provides you with notice pursuant to Washington Administrative Code (WAC) 173-303-815(3)(a)(iii) that Compliance Schedule Item 18, "Submit Engineering Information for Secondary Containment and leak Detection System for the Pretreatment Plant Miscellaneous Unit Systems," due October 30, 2006, was not completed as scheduled. This was previously communicated to the Washington State Department of Ecology (Ecology) in U.S. Department of Energy, Office of River Protection, Semi-Annual Compliance Report required by Interim Milestone M-62-01 for the period January 2006, through June 2006, dated July 31, 2006. WAC 173-303-815(3)(a)(iii) requires the permittee to notify Ecology's Director in writing, no later than 14 days following each compliance date, of its compliance or noncompliance with the requirements.

The Compliance Schedule date for Item 18 was originally established when the project was scheduled to begin operations in 2007. Technical and financial considerations described in the Reference, will delay completion of this compliance schedule item. Discussions on the revised design and construction schedules in support of Hanford Federal Facility Agreement and Compliance Order (HFFACO) milestone negotiations have been initiated. Revision to the compliance schedule dates will be proposed after HFFACO negotiations are completed.

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06-ESQ-161

-2-

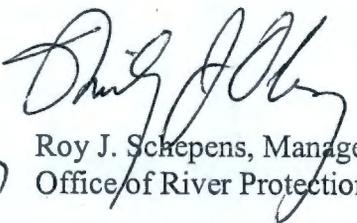
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Engineering information required to complete Compliance Schedule Item 18 consists of the three permit packages identified below.

- PTF-006: Miscellaneous Unit Secondary Containment for PTF Elevation 0 ft.;
- PTF-058: Miscellaneous Unit Secondary Containment for PTF Elevation 77 ft.; and
- PTF-064: Miscellaneous Unit Secondary Containment for PTF Elevation 56 ft.

All three permit packages have been submitted, however, in Reference 2, Ecology required the permittees to modify the Pretreatment Facility design, and revise and resubmit leak detection and waste removal documentation. The permit documents "Leak Detection Capability in the Pretreatment Facility" (24590-PTF-PER-M-04-0010) and "Waste Removal Capability for the Pretreatment Facility" (24590-PTF-PER-M-04-0011) will be revised and resubmitted.

If you have any questions, please contact us, or your staff may contact Lori A. Huffman, Office of Environmental Safety and Quality, (509) 376-0104 or Brad G. Erlandson, BNI, (509) 371-3826.


for Roy J. Schepens, Manager
Office of River Protection


W. S. Elkins, Project Director
Bechtel National, Inc.

ESQ:LAH

cc: B. G. Erlandson, BNI
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Administrative Record (WTP H-0-8)
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