



Department of Energy
Richland Operations Office
P.O. Box 550
Richland, Washington 99352

00-ORL-018

JAN 13 2000

Mr. Michael Wilson, Manager
Nuclear Waste Program
State of Washington
Department of Ecology
P.O. Box 47600
Olympia, Washington 98504

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MAR 27 2000

Dear Mr. Wilson:

EDMC

**INTERIM STATUS COMPLIANCE AT PLUTONIUM FINISHING PLANT (PFP)
TREATMENT UNIT (T-2-8)**

The PFP Treatment Unit will be used to stabilize plutonium-bearing wastes by immobilization (cementation), in accordance with the Defense Nuclear Facilities Safety Board Recommendation 94-1. A Part A, Form 3, Resource Conservation and Recovery Act (RCRA) permit application for this unit was submitted to your office on December 23, 1998, indicating that the unit should be regulated as a miscellaneous unit. Because of this miscellaneous unit status, some interpretation is required to identify the RCRA interim status standards that should be applied to the unit.

On June 3, 1998, the Richland Operations Office (RL) submitted to your office an evaluation of interim status requirements and their application at the PFP Treatment Unit. A table summarizing the requirements that RL believes should be applied to the unit is attached, along with a brief description of how RL and its contractor intend to comply with each requirement.

On September 22, 1999, the Washington State Department of Ecology (Ecology) requested that a RCRA Closure Plan be prepared for the PFP Treatment Unit. This request was premised on an expectation that the unit operations would be limited to a 6-month duration. To clarify, the unit will actually operate for several years. Hence, RL instead proposes to submit a RCRA Part B permit application for the unit. Submittal of a Part B permit application is targeted for June 2003; however, RL recognizes that the actual submittal date must be negotiated with Ecology based on its relative priority to other planned Hanford Site permitting activities.

RL is committed to begin stabilizing plutonium-bearing waste in the PFP Treatment Unit no later than April 2000. If no Ecology concerns relative to the application of interim status standards to the unit are received, RL will accept that the actions delineated in the attached table are considered sufficient for cementation of plutonium-bearing wastes to begin. RL requests that Ecology approve the Part A no later than January 24, 2000, to support the April 2000 cementation startup.

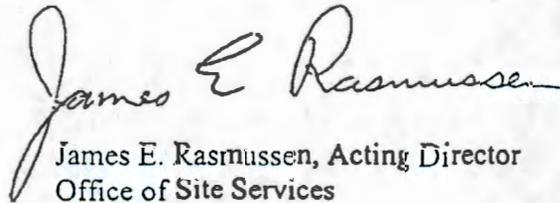
Mr. Michael A. Wilson
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If you have any questions, please contact me (509) 373-9337 or Larry Romine, Director,
Materials Disposition Division.

Sincerely,


James E. Rasmussen, Acting Director
Office of Site Services

ORL:JKY

cc: J. R. Wilkinson, CTUIR
S. Mohan, Ecology
L. E. Ruud, Ecology
R. F. Stanley, Ecology
D. A. Faulk, EPA
D. R. Sherwood, EPA
J. E. Bramson, FHI
J. S. Hertzell, FHI
R. E. Heineman, FHI
A. M. Hopkins, FHI
R. E. Piippo, FHI
L. J. Olguin, FHI
M. B. Reeves, HAB
P. Sobotta, NPT
M. L. Blazek, OOE
R. Jim, YN
FHI Administrative Record, FHI

Interim Status Standards Applicable to PFP Treatment Unit

Driving citation	Specific citations	Citation topic	Method of compliance
WAC 173-303-400	40 CFR 265; LDR and corrective action requirements; WAC 173-303-630(3) and (7); WAC 173-303-805; 40 CFR 268	Interim status facility standards	See specifics below
	40 CFR 265.171	Condition of containers	Comply
	WAC 173-303-630(3)	Identification of containers	Label exterior of glovebox as documented in RL evaluation dated 06/03/98
	40 CFR 265.172	Compatibility of waste with container	Comply
	40 CFR 265.173	Management of containers	Treatment will occur in open containers; hence the unit is being permitted as a miscellaneous unit.
	40 CFR 265.174	Inspections	Revise inspection schedule
	WAC 173-303-630(7)	Containment	Not applicable to treatment
	40 CFR 265.176	Special requirements for ignitable or reactive waste	Safety Authorization Basis
	40 CFR 265.177	Special requirements for incompatible waste	Not applicable
	40 CFR 265.178	Air emission standards	Not applicable
	40 CFR 265, Subpart G	Closure and post-closure	Preliminary Chapter 11 closure documentation on file. Submit Part B permit application decontaminate/ remove the cementation glovebox upon closure per TPA M-20 negotiation date.
	WAC 173-303-805(5)	Maintaining the interim status permit	Part A Form 3 submitted 12/23/98; Awaiting Ecology response
	40 CFR 268	Land Disposal Restrictions	Comply
WAC 173-303-680	WAC 173-303-680	Miscellaneous Units	See specifics below
	WAC 173-303-680(2)	Environmental performance standards	Comply
	WAC 173-303-680(3)	Monitoring, inspection, response, reporting, and corrective action	Comply
	WAC 173-303-680(4)	Postclosure care	Comply
WAC 173-303-300 to -400	WAC 173-303-300 to -400	General interim status facility standards	See specifics below
	WAC 173-303-300(5)	Waste analysis plan	Update WAP
	WAC 173-303-310	Security	Comply
	WAC 173-303-320(2)	General inspections	Revise inspection schedule
	WAC 173-303-330(2)	Personnel training	Revise training plan
	WAC 173-303-340	Preparedness and prevention	Revise contingency plan/emergency procedures
	WAC 173-303-350(2)	Contingency plan and emergency procedures	Revise contingency plan/emergency procedures
	WAC 173-303-360	Emergencies	Revise contingency plan/emergency procedures
	WAC 173-303-380(1)	Facility recordkeeping	Comply
	WAC 173-303-390	Facility reporting	Comply
WAC 173-303-395	Other general requirements	Comply; label exterior of glovebox as documented in RL evaluation dated 06/03/98	

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Sincerely,

ORIGINAL SIGNED BY:

James E. Rasmussen, Acting Director
Office of Site Services

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R. Jim, YN
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bcc: ORL OFF FILE L. Romine, MDD S. Mendoza, ORL
ORL RDG FILE B. Williamson, OCC
JKY RDG FILE AMI Rdg file

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RECORD NOTE: Ecology failure to approve Part A will impact April 2000 cementation
startup and corresponding performance incentive.

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JAN 14 2000
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Prev. Conc.

Office >	ORL	MDD <i>LDR</i>	AMNM	OCC <i>EDW</i>	AMLD	OSS
Surname >	YERXA/SANDER S	ROMINE	KNOLLMAYER	CAROSINO	BILLARD	RASMUSSEN
Date >	P. CONCURRED	1-12-00	1/13/00	1/12/00	1/12/00	1/13/00

(Please return to Stella Mendoza 6-1906 A5-15/FED FAX 6-0306)

Document No. 16993

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JKY RDG FILE AMI Rdg file

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Office >	ORL	MDD	AMNM	OCC	AMM.	OSS
Surname >	VERXASANDER, S	ROMIIE	KNOLLMEYER	CAROSINO	BALLARD	RASMUSSEN
Date >	1/11/00					

(Please return to Stella Mendoza 6-1906 A5-15/FED FAX 6-0306)

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