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STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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September 2, 1993

Mr. Robert G. Holt, Acting Program Manager  
Office of Environmental Assurance, Permits, and Policy  
U.S. Department of Energy  
PO Box 550 A5-15  
Richland, WA 99352



Dear Mr. Holt:

Re: Request for Approval of Exemption from Lined Trench Requirements and from Land Disposal Restrictions for Residual Liquid at 218-E-12B Burial Ground Trench 94.

Ecology has received your letter dated January 7, 1993, which transmits an Engineered Performance Plan and requests a temporary exemption regarding your Request for Exemption from Lined Trench Requirements and from Land Disposal Restrictions for Residual Liquid at 218-E-12B Burial Ground Trench 94 (Rev. 1) (Exemption Request). <sup>25900</sup> Based upon our review of these documents, Ecology has determined that the Engineered Performance Plan, in concept, will fulfill our request for a demonstration project to verify the adequacy of the submarine reactor compartment disposal alternative. The alternative landfill design described in the exemption request can be used until the design is approved or disapproved in the final permit because Trench 94 is an interim status unit. Therefore, a temporary exemption is not considered appropriate at this time. Although this design can be used, Ecology encourages Energy to not cover the SRC's until we provide concurrence with the detailed Engineered Performance Plan.

Ecology is basing this determination on the technical information provided in your Exemption Request which demonstrates the equivalency of the alternate landfill design for the SRCs to a double lined trench with a leachate collection system. Due to the high integrity containment provided by the SRCs, the low volume of residual liquid relative to the total volume of waste package, and the well characterized solid waste form, Ecology has determined that there is low potential for adverse impacts on human health and the environment and finds that there is a substantial likelihood that the exemption will be granted when the Low Level Burial Grounds are incorporated into the Hanford Facility Dangerous Waste Permit (Hanford Facility Permit).

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In conclusion, Ecology believes that the alternate landfill design for the SRCs is protective of human health and the environment and considers the Exemption Request to be complete and acceptable for incorporation into the Low Level Burial Grounds Dangerous Waste Permit Application documentation. The alternative landfill design described in the Exemption Request can be used until the Low Level Burial Grounds is incorporated into the Hanford Facility Permit because the Low Level Burial Grounds, which includes Trench 94, is an interim status unit. Final status approval for this operation will not be granted until incorporation of the Low Level Burial Grounds into the Hanford Facility Permit. This will require Ecology's review of the Performance Plan details and a public comment period. If the alternate design is approved, disposal may continue as practiced during interim status. Should the alternate design not be approved, continued disposal using the design would not be allowed.

Please contact Mr. Joe Witczak at (206) 438-7765, if you have any questions.

Sincerely,

  
David B. Jansen, P.E.  
Section Manager  
Nuclear and Mixed Waste Management Program

DBJ:jr

cc: Sue Price, WHC  
Dan Duncan, EPA

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Subject: REQUEST FOR APPROVAL OF EXEMPTION FROM LINED TRENCH REQUIREMENTS AND FROM LAND DISPOSAL RESTRICTIONS FOR RESIDUAL LIQUID AT 218-E-12B BURIAL GROUND TRENCH 94

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