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DEPARTMENT OF ECOLOGY

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May 12, 1993



Mr. Steven H. Wisness
Project Manager
U. S. Department of Energy
P. O. Box 550, A5-19
Richland, WA 99352-0550

Dear Mr. Wisness:

Please note that I am in receipt of your May 6, 1993, letter to George Hofer and I regarding single-shell tank 241-BX-111. For the reasons noted below, I do not believe that the approach you have recommended (utilization of additional work provisions of the Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement or TPA)) is appropriate. However, I encourage you to continue to require site operations staff to act, in order to initiate removal of remaining liquids within this tank no later than August 31, 1993.

In considering your request that the Department of Ecology (Ecology) approve a new interim milestone under the TPA (memorializing your suggested initial pumping date), I have a number of concerns and/or questions which the U. S. Department of Energy (USDOE) should respond to before we proceed. These are as follows:

1. I am concerned over USDOE's apparently suggested approach that each time a Hanford tank is discovered to be leaking (extremely hazardous waste), we simply establish a date in the future by which time USDOE will **begin** to take action. This piecemeal approach is neither adequate or acceptable, in that it does not adequately recognize or respond to the risks that these wastes pose to the environment and human health, or the need for a broad, integrated, and aggressive approach to halt additional, continuing, and future releases from Hanford tanks at its 200-Area tank farms.

I recommend that you work with USDOE's Tank Waste Remediation System staff in formulating such a program, one which has as its principle elements: An aggressive approach to waste retrieval and analysis of removed wastes, acquisition of sufficient



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additional tank space, upgrades to tank farm management and response systems and waste transfer facilities, resolution of tank safety issues, and barrier technology development and implementation.

2. I am also concerned that the suggested interim milestone lacks sufficient specificity in that it: (1) contains no indication of rate of retrieval or level of effort, (2) contains no indication that pumping will be continuous, or near continuous (thereby apparently allowing any number of work stoppages) and, (3) includes no provision under which liquids removed will be analyzed for content, and the results provided regulators.
3. I also note that even if we were to utilize the provisions of Article XXIX (additional work) of the Tri-Party Agreement as the principle approach to USDOE's failing tanks, individual requests, such as your letter to Mr. Hofer and I, should address whether or not proposed additional work will adversely effect work schedules or require significant revisions to any approved schedule.

I would appreciate USDOE's review of these concerns before we proceed in this matter. You should also note that prior to agreement between Ecology and USDOE, our staff will be addressing conditions at tanks such as 241-BX-111 under our compliance program.

Sincerely,



Roger Stanley, Director
Tri-Party Agreement Implementation
Nuclear and Mixed Waste Management Program

RS:dr

cc: John Anttonen, USDOE
George Hofer, EPA
Paul Day, EPA
Dave Jansen, Ecology
Dave Nylander, Ecology

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Subject: RECEIPT OF MAY 6, 1993 LETTER TO GEORGE HOFER AND ROGER STANLEY REGARDING SINGLE-SHELL TANK 241-BX-111.		

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