



START

Department of Energy

Richland Field Office

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93-RPS-342

Ms. Dru Butler, Program Manager
Nuclear and Mixed Waste Program
State of Washington
Department of Ecology
P.O. Box 47600
Olympia, Washington 98504-7600

Mr. Douglas R. Sherwood
Acting Hanford Project Manager
U.S. Environmental Protection Agency
Region 10
712 Swift Boulevard, Suite 5
Richland, Washington 99352



Dear Ms. Butler and Mr. Sherwood:

REQUEST FOR DEFERRAL OF SUBMITTAL OF THE HANFORD FACILITY DANGEROUS WASTE PERMIT APPLICATION, WASTE RECEIVING AND PROCESSING, REVISION 1 (TSD: TS-2-4)

The U.S. Department of Energy, Richland Operations Office (RL) requests that the submittal of the Hanford Facility Dangerous Waste Permit Application, Waste Receiving and Processing (WRAP Part B), Revision 1, be deferred until **March 31, 1994**. This letter is in response to an action item assigned to the Westinghouse Hanford Company (WHC) and RL at a July 26, 1993, Unit Managers' Meeting.

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The WRAP Part B, Revision 0, was submitted to the State of Washington Department of Ecology (Ecology) on October 31, 1991, in accordance with the Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) Milestone M-20-12. On June 4, 1992, RL received notice of deficiency (NOD) comments from Ecology for the WRAP Part B, Revision 0. The NOD comment responses were incorporated into a NOD response table and sent to Ecology on September 21, 1992. A second set of NOD comments was received from Ecology on March 10, 1993. Responses to these NOD comments were incorporated into a NOD response table and sent to Ecology on June 10, 1993. In accordance with the established guidelines in the Tri-Party Agreement, the submittal of the WRAP Part B, Revision 1, is due to Ecology 220 days after Ecology's review of the NOD response table. Based on Ecology's comment responses and the Tri-Party Agreement guidelines, the submittal of Revision 1 is due January 31, 1994.

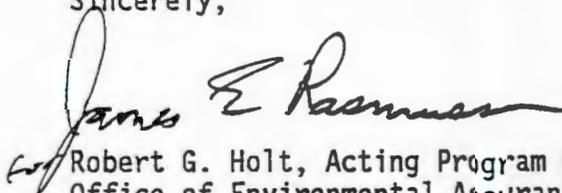
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However, it is requested that an extension be granted for submittal of the WRAP Part B, Revision 1, from January 31, 1994, to March 31, 1994. This request is based on comments received from Ecology and the U.S. Environmental Protection Agency (EPA) on June 16, 1993, on the 616 Nonradioactive Dangerous Waste Storage Facility (NRDSWF) Waste Analysis Plan. The Ecology and EPA comments on the 616 NRDSWF will have a direct impact on how waste analysis plans for all Part B permit applications will be written. Because of the complexity of the comments and the Hanford Facility-wide impacts, an expanded effort will be required to prepare a waste analysis plan for the WRAP Part B. This request was discussed with Jeanne Wallace of the Kennewick Ecology office on August 31, 1993. Ms. Wallace was supportive of this plan to request an extension. The proposed extension should provide enough time to prepare a waste analysis plan for the WRAP Part B that adequately addresses comments generated from Ecology and EPA on the 616 NRDSWF.

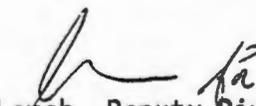
Should you have any questions regarding this request for deferral of the submittal of the WRAP Part B, Revision 1, please contact Mr. C. E. Clark of RL on (509) 376-9333 or Ms. S. M. Price of WHC on (509) 376-1653.

Sincerely,



Robert G. Holt, Acting Program Manager
Office of Environmental Assurance,
Permits, and Policy
DOE Richland Operations Office

EAP:CEC



R. E. Lerch, Deputy Director
Restoration and Remediation
Westinghouse Hanford Company

cc: Administrative Records, H6-08
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S. Price, WHC
J. Wallace, Ecology

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Subject: REQUEST FOR DEFERRAL OF SUBMITTAL OF THE HANFORD FACILITY DANGEROUS
 WASTE PERMIT APPLICATION, WASTE RECEIVING AND PROCESSING, REVISION 1
 (TSD: TS-2-4)

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