



Department of Energy

Richland Field Office

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9301595

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Mr. Paul T. Day  
Hanford Project Manager  
U.S. Environmental Protection Agency  
712 Swift Boulevard, Suite 5  
Richland, Washington 99352

Mr. David B. Jansen, P.E.  
Hanford Project Manager  
State of Washington  
Department of Ecology  
P.O. Box 47600  
Olympia, Washington 98504-7600



Dear Messrs. Day and Jansen:

ENVIRONMENTAL RESTORATION (ER) TREATMENT, STORAGE & DISPOSAL SYSTEM (ERTSDS):  
INITIATION OF DISCUSSIONS REGARDING THE ER STORAGE & DISPOSAL FACILITY (ERSDF)

This letter requests your involvement and support of vital and important ER cleanup activities at the Hanford Site. Starting in December 1992, we would like to initiate discussions with you to consider and resolve regulatory and program management issues affecting the overall ERTSDS and the life cycle of the ERSDF. The subjects we wish to discuss during the next few months include the following: applicable relevant and appropriate requirements (ARARs), facility siting, waste characterization, functional design criteria, project documentation, site characterization, safety documentation, performance assessment, conceptual design and closure.

The potential operable unit (OU) response actions may generate significant quantities of wastes. Implementation of remediation calls for the development of the 200 Area ERSDF for waste generated during cleanup activities. Design activities will commence in 1993 and continue through 1994. Components of the ERSDF may be necessary as early as 1996 in order to support the possible Records of Decision actions for the 100 Area and 300 Area OUs.

From experience we know that significant early and appropriate regulator involvement, open communications, cooperation and dedicated commitment benefits all interested parties and will assure that optimum environmental cleanup progress is achieved. We have arrived at the point in time where increased regulatory coordination is essential to the achievement of timely progress in the ER program.

We propose that the logical starting point for initiating interagency discussions on the specific program plan is the Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement). Article XVII, Paragraphs 54 and 55 of the Tri-Party Agreement indicate that a storage and disposal facility is exempted from the administrative requirement of having to obtain permits prior to construction or operation. The facility must nonetheless satisfy all ARARs which would have been included in such permits.



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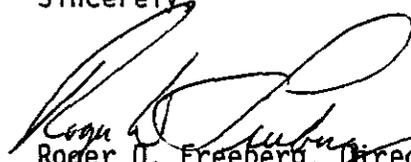
We believe it is both desirable and necessary to identify, discuss and achieve formal consensus regarding the ARARs that will be applied to this facility at the earliest possible time. Early agreement on ARARs is needed to ensure that the design and construction of the facility are adequate and appropriate, and that a timely initiation of operations is achieved. Identified ARARs will be incorporated directly into primary design documentation.

At the proposed first meeting we will give a presentation on the ERSDF Program and a tentative identification of ARARs. We ask that you please provide us with the names of the individuals who will represent your agency in the discussions. We will then contact those individuals to schedule the meetings.

It is our hope and goal that we can quickly focus discussion on critical factors, identify areas where additional information may be desired or required, clarify relevant policy guidance as applied to the ERSDF Program and clearly define issues requiring further discussion. At the first meeting we will also propose a follow-on schedule of meetings to structure and organize the interagency activities and deliberations which we hope will occur during the next few months.

Please feel free to call Mr. James D. Goodenough of my staff on (509) 376-7087 if you have any questions.

Sincerely,



Roger D. Freeberg, Director  
Environmental Restoration Division

ERD:JDG

cc w/att:  
B. A. Austin, WHC  
D. J. Cannon, USACE  
J. L. Monhart, EM-442  
R. D. Wojtasek, WHC

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## FY 1993 WORKSCOPE ACTIVITIES

PROJECT W-296  
ENVIRONMENTAL RESTORATION - STORAGE AND DISPOSAL FACILITY (ERSDF)

1. Project Management Plan. Preparation of a project specific plan that establishes technical project description, work-breakdown structure elements, preliminary project schedule, project organizational structures and responsibilities, key decision points, change control process management systems, contracting plan, and application of essential DOE Order 4700.1 requirements.
2. Regulatory Negotiations. Negotiations concerning onsite determination, permitting options, Land Disposal Restriction issues, facility design requirements, equivalency of design to existing requirements, regulatory decision milestones, Tri-Party Agreement revision, treatment options, storage options, transportation issues, waste acceptance criteria (WAC).
3. Waste Volume, Form and Type Determination. Refinement of existing and ongoing work to determine: waste volumes for disposal facility scaling and design parameters; waste form and type information to determine handling and disposal needs, safety evaluation boundary conditions, as well as treatment and storage facility design requirements.
4. WAC Determination. WAC to be developed specifically to address and accommodate all waste streams generated under the ER Program (Remedial Action and Decontamination and Decommissioning). The WAC will be tailored into an integrated systems approach to accommodate the ER Program Comprehensive Environmental Response, Compensation and Liability Act/Resource Conservation and Recovery Act (RCRA) Past Practice Management Records of Decision and integrated facility decommissioning actions.
5. Conceptual Design (CD) Report. Preliminary design of ERSDF facilities, including tradeoff studies, selection of preferred alternatives, preliminary drawings, Title I cost estimate, and preliminary construction schedules.
6. Permitting Strategy Determination (See Regulatory Negotiations). Description of permitting approach and requirements, including RCRA, Clean Air Act, Clean Water Act, 216 Permit, National Pollution Discharge Elimination System.
7. Permit Writing and Submittal (If Required). Generation of permits to cover the disposal facility, treatment facility(s), and storage facility(s).
8. National Environmental Policy Act (NEPA) Documentation. Integration of the ERSDF within the Hanford Remedial Action-Environmental Impact Statement or preparation of an independent NEPA document.
9. Safety Documentation. Initial work includes hazard classification, safety assessment, preliminary identification of safety equipment and preliminary safety evaluation.

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10. Performance Assessment. Performance assessment to determine the ability of the disposal facility to perform per established standards based on waste characteristics, facility design, barrier (cover) design, environmental conditions, and design life.
11. Siting Studies and Site Characterization. Finalize siting studies and obtain DOE approval. Obtain site characterization data as input to the CD criteria and CD to include:
  - a. Site Characterization Plan
  - b. Surface, vadose and groundwater characterization
  - c. Geologic characterization
  - d. Cultural resources review
  - e. Biological assessment
  - f. Physical and contaminant surveys
  - g. Topographic and geologic mapping

01/28/12

# CORRESPONDENCE DISTRIBUTION COVERSHEET

Author: R. D. Freeberg, RL  
Addressee: Paul T. Day, U. S. EPA  
David B. Jansen, Ecology  
Correspondence No.: Incoming: 9301595  
Subject: Environmental Restoration (ER) Treatment, Storage and Disposal System (ERTSDS): Initiation of Discussions Regarding the ER Storage and Disposal Facility (ERSDF)

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		R. D. Wojtasek (assignee)	H6-27	
		EDMC	H6-08	

NOTE: Received incoming without attachment    (3/31/93)



\*Reissue to correct distribution

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