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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

1315 W. 4th Avenue • Kennewick, Washington 99336-6018 • (509) 735-7581

December 21, 1995

Mr. James E. Rasmussen, Director
Environmental Assurance, Permits, and Policy Division
U.S. Department of Energy Richland Operations Office
P.O. Box 550
Richland, WA 99352

Mr. William T. Dixon, Director
Environmental Services
Westinghouse Hanford Company
P.O. Box 1970
Richland, WA 99352



Dear Messrs. Rasmussen and Dixon:

Re: Hanford Facility Dangerous Waste Part A Permit Application, Form 3, Revision 4,
for the 224-T Transuranic Waste Storage and Assay Facility (TRUSAF)
(WA7890008967) (TSD: S-2-2)

The Washington State Department of Ecology (Ecology) has received and reviewed the U.S. Department of Energy's (USDOE) above-referenced Part A Permit Application. Per WAC 173-303-805(2), the August 31, 1995, meeting with USDOE, Ecology, and Westinghouse Hanford Company representatives served as notice that the Part A Permit Application failed to provide the required information. Specifically, the Part A Permit Application does not clearly include the paved asphalt areas outside the 224-T building as part of the unit. Also, the Part B Permit Application indicates the area will be used in relation to operation of the unit and the 224-T Building Record of Survey, Drawing H-13-000075, included in Appendix 2A of the Part B Permit Application, clearly establishes the asphalt paved areas as part of the unit.

As discussed during the August 31, 1995, meeting, due to the lack of information regarding contents of hot cells A - F located on the eastern side of the building, Ecology concurs the hot cells do not qualify for interim status. It should be noted that Ecology's position, as established by the 224-T TRUSAF Part B Permit Application Notice of Deficiency (item 17), issued on January 21, 1994, regarding storage representing active waste management has not changed. Therefore, as agreed, at such time a determination is made that storage of dangerous or mixed waste has occurred in the radiologically contaminated process cells, Ecology will impose

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applicable and appropriate waste management controls. In the interim, Ecology requests a schedule be submitted which identifies when a record review will be conducted to collect documentation regarding the contents of the process cells.

Please resubmit the revised Part A and requested schedule by February 28, 1996. If you or your staff have any questions regarding this letter, please call me at (509) 736-3034. Also, if you or your staff have any questions regarding the Solid Waste Treatment and Disposal Project, please call Laura Cusack, Project Manager at (509) 736-3038.

Sincerely,


Alisa D. Huckaby, Unit Manager
Nuclear Waste Program



AH:mf

- cc: Roger Gordon, USDOE
Paul Jones, USDOE
Dave Bartus, EPA
Doug Sherwood, EPA
Dan Sauressig, WHC
Roger Bowman, WHC
224-T TRUSAF Administrative Record, H6-08