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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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

April 28, 2004

Mr. Joel Hebdon, Director
Regulatory Compliance and Analysis Division
Richland Operations Office
United States Department of Energy
P. O. Box 550, MSIN: A5-15
Richland, Washington 99352

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EDMC

Dear Mr. Hebdon:

Re: Comment Resolution of Proposed Modifications to the Part A, Form 3 Permit Applications for the Central Waste Complex (CWC) and the Waste Receiving and Processing Facility (WRAP), as set forth in the Part A, Form 3, Comment Table 61491

As follow up to the Washington State Department of Ecology's (Ecology) letter dated March 10, 2004, (copy enclosed) regarding Ecology's comments on the United States Department of Energy, Richland Operations Office (USDOE-RL) submission of Part A, Form 3, notices concerning modifications at Hanford's CWC and WRAP, with particular reference to the Part A, Form 3, Comment Table, and consistent with Ecology's letter of April 9, 2004, (copy enclosed) concerning Ecology's determination that USDOE-RL's proposed boundary modification would not result in an increase in overall design capacity at the Hanford facility, or otherwise constitute an expansion of the facility (Washington Administrative Code [WAC] 173-303-040), representatives of Ecology, USDOE-RL, and Fluor Hanford met and agreed to proposed language for resolving the remaining comments set forth in the Part A, Form 3, Comment Table from Ecology's March 10, 2004, letter as follows:

Ecology Response to the Part A Comment Table for CWC/WRAP

Comment 3 - Ecology Response: USDOE-RL has agreed that the February 28, 2001, approval of WRAP, Revision 3 and CWC, Revision 6, Part A, Form 3 permit applications have been approved by Ecology. Ecology agrees that the WRAP, Revision 4 and CWC, Revision 7 submitted on July 21, 2003, will be approved based on agreements within this Comment Table.



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Comment 5 - Ecology Response: Ecology agrees that the critical systems agreed to in the Part B permit applications will be consistent with the Mod E Final Settlement Agreement and not include the heating, ventilation and air conditioning systems.

Comment 7 - Ecology Response: Ecology agrees that transferring the process design capacity and realigning the treatment, storage, and disposal (TSD) boundary of building 2404 WB and 2404-WC from CWC to WRAP does not require public review and can be accomplished without invoking the Notice of Intent process in accordance with WAC 173-303.

Comment 8 - Ecology Response: Ecology agrees that changes to the legend in the revised WRAP Part A, Form 3 permit application can be modified and submitted with the revised Part B permit applications.

Comment 9 - Ecology Response: Ecology agrees that text will be added to the WRAP Part B permit application to identify that the NDA/NDE can be performed in various locations within the permitted TSD boundary.

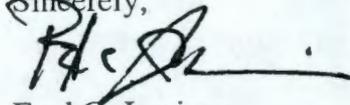
Comment 10 - Ecology Response: USDOE-RL agreed that the CWC and WRAP Part A, Form 3, permit applications will be reviewed and modifications to the dangerous waste numbers will be made when the Part A, Form 3s are submitted with the revised CWC/WRAP Part B permit applications.

Comment 11 - Ecology Response: The CWC Part B permit application will be revised to adequately describe the treatment process and submitted to Ecology for approval before initiation of treatment is to be performed.

Comment 15 - Ecology Response: A statement will be added to the CWC Part B permit application to give a description of the liquid discharge into the drain field under the Site-wide Industrial Stormwater Discharges to Engineered Land Disposal Structures (ST4510.)

Ecology's comments, as set forth above, were reviewed at the April 22, 2004, Waste Management Project Managers Meeting and representatives of Ecology, USDOE-RL, and Fluor Hanford all agreed this language represents resolution of all comments set forth in the Part A, Form 3, Comment Table, as contained in Ecology's letter of March 10, 2004, and as also addressed in part in Ecology's letter dated April 9, 2004.

Sincerely,



Fred C. Jamison
Waste Management Project Manager
Nuclear Waste Program

Attachments: 2
cc: see next page

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cc: Todd Martin, HAB
Stuart Harris, CTUIR
Pat Sobotta, NPT
Russell Jim, YN
Ken Niles, ODOE
Joseph Shorin, AAG
Mike Wilson, Ecology
Greta Davis, Ecology
Alicia Hamar, Ecology
Ron Skinnarland, Ecology
Eric Van Mason, Ecology
Jeanne Wallace, Ecology
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