



U.S. Department of Energy
Office of River Protection

0080643

P.O. Box 450, MSIN H6-60
Richland, Washington 99352

MAR 24 2009

09-ESQ-094

Mr. Jack Boller (OCE-127)
U.S. Environmental Protection Agency
1200 Sixth Avenue, Suite 900
Seattle, Washington 98101

RECEIVED
MAR 31 2009
EDMC

Dear Mr. Boller:

REQUEST FOR ADDITIONAL CLARIFICATION OF THE NOTICE OF VIOLATION (NOV) U.S. ENVIRONMENTAL PROTECTION AGENCY (EPA)/WASHINGTON STATE DEPARTMENT OF ECOLOGY (ECOLOGY) ID NUMBER WA7890008967, DATED MARCH 3, 2009 (OCE-127)

The U.S. Department of Energy (DOE), Office of River Protection received the subject NOV on March 9, 2009, alleging violations of Washington Administrative Code (WAC) 173-303-573(21)(d), Failure to properly label universal waste lamps; WAC 173-303-573(22)(c), Failure to properly date universal waste lamps; WAC 173-303-573(21)(a), Failure to properly label universal waste batteries; and WAC 173-303-573(22)(c), Failure to properly date universal waste batteries, based on an inspection conducted on September 24 and 25, 2008. DOE takes exception to the NOV, and believes it has managed the universal waste described in the NOV consistent with the requirements of WAC 173-303-573 through the implementation of the Management Plan for Recycle Materials Administered by Hanford's Centralized Consolidation/Recycling Center (HNF-EP-0863), attached. The management plan was developed with the support and concurrence of Ecology (attached), the state agency that administers Washington's authorized hazardous waste management program. The NOV raises sitewide policy issues for the Hanford Facility.

Container labels are used in accordance with Section 3.2 Standards for Accumulation of the management plan (HNF-EP-0863). Container logs are used at the 616 facility to track items placed in the containers including the dates the items were added to the container. After years of managing these universal wastes consistent with the management plan, DOE does not understand the rationale for the NOV and considering the inspection was conducted in September of last year, why it took this long to be notified. Also, there was no indication at the closeout to the inspection that we were noncompliant.

DOE also requests an extension of 45 days to May 8, 2009 to respond to the NOV. This extension is needed to coordinate our response with Ecology, the other DOE Offices, and contractors, as well as evaluate the sitewide implications and potential changes to sitewide practices. We would like to meet with both EPA and Ecology to discuss issues raised in the NOV. We look forward to working with you to resolve the NOV.

Mr. Jack Boller
09-ESQ-094

-2-

MAR 24 2009

If you have any questions, please contact me, or your staff may contact Lori A. Huffman,
Director, Environmental Compliance Division, (509) 376-0104.

Sincerely,



Shirley J. Olinger, Manager
Office of River Protection

ESQ:DWB

Attachment

cc w/attach:

S. J. Bensussen, CHRPC
J. A. Hedges, Ecology
R. R. Skinnarland, Ecology
E. J. Van Mason, Ecology
S. R. Weil, RL

Administrative Record

BNI Correspondence
Environmental Portal, LMSI
WRPS Correspondence

cc w/o attach:

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G. A. Hanson, CH2M HILL
A. G. Miskho, CHPRC
D. Bartus, EPA
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J. K. Perry, FH
K. A. Peterson, FH
H. T. Tilden, PNL
T. L. Aldridge, PNSO
C. E. Clark, RL
A. C. McKarns, RL
K. A. Hadley, WCH
P. T. Day, WRPS
J. A. Voogd, WRPS

Attachment
09-ESQ-094

Management Plan for Recyclable Materials Administered by
Hanford's Centralized Consolidation/Recycling Center
HNF-EP-0863, Revision 2
October 9, 2002

RELEASE INSTRUCTIONS (RI) NO RETURN RECEIPT	Document No.: HNF-EP-0863
Page 1 of 1	

To:	Title: MANAGEMENT PLAN FOR RECYCLABLE MATERIALS ADMINISTERED BY HANFORD'S CENTRALIZED CONSOLIDATION/RECYCLING CENTER Release No.: 2 Date Prepared: 10/15/2002
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HNF-EP-0863
Revision 2
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Management Plan for Recyclable Materials Administered by Hanford's Centralized Consolidation/Recycling Center

Prepared for the U.S. Department of Energy
Assistant Secretary for Environmental Management
Project Hanford Management Contractor for the
U.S. Department of Energy under Contract DE-AC06-96RL13200

Fluor Hanford

P.O. Box 1000
Richland, Washington

HNF-EP-0863
Revision 2

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Management Plan for Recyclable Materials Administered by Hanford's Centralized Consolidation/Recycling Center

B.J. Dixon
Fluor Hanford, Inc.

Date Published
October 2002

Prepared for the U.S. Department of Energy
Assistant Secretary for Environmental Management

Project Hanford Management Contractor for the
U.S. Department of Energy under Contract DE-AC06-96RL13200

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Chris Willingham 10/9/02
Release Approval Date

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Appendix A

**MANAGEMENT PLAN FOR RECYCLABLE MATERIALS
ADMINISTERED BY HANFORD'S CENTRALIZED CONSOLIDATION/
RECYCLING CENTER**

1. INTRODUCTION

In January 1995, a proposal for alternative management of aerosol products, batteries, and light ballasts with dioctyl phthalate (DOP) capacitors was transmitted to the State of Washington Department of Ecology (Ecology) for approval. The proposal's intent was to encourage recycling by consolidating these materials at a central location in order to make recycling economically feasible. The central location under this plan was called the Centralized Consolidation/Recycling Center (CCRC).

In order for the concept to satisfy regulatory requirements, the CCRC was considered the point of generation where the waste initially accumulated. Under this approach, recyclable material would not be considered to be solid waste until after it was received at the CCRC and the determination had been made concerning the material's disposition. Since this interpretation differed from the current site practice, Ecology was asked to provide concurrence for the proposal. The proposal described how recyclable material would be managed at facilities and at the CCRC to ensure the protection of human health and the environment. Ecology's concurrence with the proposal was received in April 1995. The letter providing the concurrence noted that the proposal was, "in the spirit of resource conservation and recovery," and encouraged an expanding effort for waste reduction and recycling of commonly generated "nuisance" hazardous waste at the Hanford Site. The letter further noted that regulatory pathways for recycling of commonly generated hazardous wastes could be determined.

The CCRC was established in the 400 Area of the Hanford Site shortly after obtaining Ecology's concurrence. After demonstrating that the three initial waste streams could be successfully recycled, Ecology was asked to approve additional waste streams. Concurrence to add sodium vapor, mercury vapor, and incandescent lamps was received in October 1996. Concurrence to add mercury and mercury-containing equipment was obtained in January 1998. Several of these recyclable materials are included in the provisions for "universal waste" that were adopted subsequent to receiving Ecology concurrence for the CCRC approach. This Management Plan updates the original proposal by incorporating universal waste and other regulatory standards and by including information about the approach for managing additional recyclable materials. Upon Ecology concurrence of this Management Plan, it supersedes the following documents:

- WHC-EP-0863, *Centralized Consolidation/Recycling Center*. This document was sent to Ecology in January 1995. It contained the initial proposal for management of aerosol products, batteries, and DOP ballasts as recyclable materials. The proposal was implemented in May 1995 after receiving Ecology concurrence.
- Letter, David L. Lundstrom, State of Washington Department of Ecology (Ecology), to James Rasmussen, RL, et al., "Comments to January 1995, Proposed Centralized Consolidation/Recycling Center on the Hanford Site," dated April 18, 1995. This letter conveys Ecology's concurrence with the United States Department of Energy, Richland Operations Office (RL) January 1995 proposal.

- Letter, Michael Wilson, Ecology, to James E. Rasmussen, RL, "Additional Waste Streams Proposed for Management at the Consolidation Center," dated October 21, 1996. This letter confirmed Ecology's concurrence with the addition of mercury, sodium, and incandescent light bulbs for management at the CCRC.
- Letter, Michael A. Wilson, Ecology, to James E. Rasmussen, RL, "Re: 97-EAP-779," dated January 30, 1998. This letter confirmed Ecology's concurrence for the addition of mercury and mercury containing equipment for management at the CCRC.

This Management Plan represents one aspect of the overall Hanford Pollution Prevention and Waste Minimization Program. Other aspects of the overall program include non-hazardous material recycling, project-specific activities, and the Excess Chemical Program. Additional recyclable materials will be evaluated for inclusion to this plan based on evidence of the material's recyclability (a market for the material and a recycler with demonstrated ability to recycle the material). For management practices requiring a regulatory determination, revisions to this plan will be submitted to Ecology for concurrence. It should be noted that other materials may be managed by the CCRC provided that such activity is in accordance with applicable regulatory requirements.

At a site as large as Hanford, some adaptation is necessary to encourage maximum participation in recycling programs. As with earlier proposals, Ecology concurrence is required for the interpretation that the recyclable materials addressed in this plan are not solid wastes until the decision to discard them is made at the CCRC. This regulatory interpretation is valid only as long as the materials are managed in accordance with the protocols established in this plan. (Note: this provision only applies to recyclable materials that are aggregated at CCRC prior to shipment to an offsite recycler.)

2. SCOPE

The following recyclable materials are within the scope of this Management Plan:

- Aerosol Products.
- Mercury and Mercury Containing Equipment.
- Universal Waste Lamps and Batteries.
- Crushed Fluorescent Lamps.
- Lead-acid Batteries.
- Electric Ballasts or Capacitors.
- Used Shop Towels.
- Used Oil.
- Spent Antifreeze.

3. STANDARDS FOR MANAGEMENT OF RECYCLABLE MATERIALS AT FACILITIES PRIOR TO CONSOLIDATION AT CCRC

3.1 Recyclable materials accepted at the CCRC include the following:

- Aerosol products, with the exception of jumbo cans (greater than 3 inches in diameter) and those containing expanding foam sealant. Aerosol product cans must have caps on them when shipped to the CCRC.
- Mercury and mercury-containing equipment with readily recoverable mercury. (Facility personnel should consult with CCRC personnel to confirm whether equipment contains readily recoverable mercury.)
- Universal waste lamps and batteries
- Intact or unintentionally broken universal waste lamps as defined in WAC 173-303-040, including, but not limited to, neon, fluorescent, incandescent, mercury (high and low-pressure), and sodium (high and low-pressure) lamps. Lamps must be segregated and packaged per Department of Transportation (DOT) rules by lamp type.
- Batteries, including but not limited to alkaline, carbon zinc/zinc-chloride, nickel cadmium, mercury/mercury oxide, lithium, magnesium, zinc silver, and Polaroid polapulse. Prior to shipment to CCRC, batteries must be segregated and packaged per DOT rules by battery type. Glass-cased or leaking or cracked batteries containing liquid electrolytic solution, oil filled batteries, missile, aluminum, or absolyte batteries will not be accepted at the CCRC.
- Crushed fluorescent lamps.
- Lead-acid batteries. Glass-cased or leaking or cracked batteries containing liquid electrolytic solution and oil filled batteries will not be accepted at CCRC.
- Electrical ballasts or capacitors that do not contain PCBs or designate as a dangerous waste. Electrical ballasts or capacitors that contain batteries shall be segregated and packaged in separate containers from other electrical ballasts or capacitors.

Facilities that generate these recyclable materials must manage them in accordance with the following standards to qualify for coverage under this plan. The standards identify practices that will help ensure that these materials are managed in a safe and environmentally protective manner.

3.2 Standards for Accumulation

- Personnel who set up, maintain, or dismantle accumulation areas shall receive a briefing on the accumulation standards for generators for each type of recyclable material managed under their purview.
- Accumulation containers shall be marked with "Recycle Accumulation Area for (insert the name of the material, e.g., Aerosol Products, Fluorescent Lamps, Mercury-Containing Equipment)." The mark shall be obtained from or approved by CCRC personnel.
- Recyclable materials shall be accumulated in a manner and location that maintains container integrity.
- Flammables shall be stored in accordance with standards established by Hanford Site contractor procedures.
- Recyclable materials shall be accumulated in a manner that prevents releases or spills.
- Recyclable materials shall be accumulated in a manner that avoids reaction of incompatible materials.
- Only non-radioactive recyclable materials shall be accumulated under this plan.

(Note: Materials containing metal that will be recycled will be subject to Hanford Site requirements for unrestricted release of metal for recycling.)

- When accumulating mercury-containing equipment, measures shall be taken, as practicable, to minimize breakage that would result in the release of mercury.
- When accumulating batteries, the battery contacts shall be protected with tape or packaged to avoid being short-circuited. It is recommended that batteries be accumulated by battery type. All liquid-filled batteries shall have caps, plugs, or covers over the opening to prevent spills or releases.
- When accumulating lamps, each lamp type should be collected separately to avoid repackaging. Measures should be taken, as practicable, to minimize breakage of intact lamps.

3.3 Acceptance Criteria for Receipt at the CCRC

- A completed CCRC Form for the recyclable material being accumulated shall accompany the shipment.
- A completed Radiological Release Certification Form shall accompany the shipment.
- Applicable standards identified in 3.1 and 3.2 must have been met.

3.4 Transportation Standards

- Recyclable materials that meet the definition of a DOT Hazardous Material shall be shipped to the CCRC in compliance with DOT's Hazardous Materials Regulations (49 CFR 171-180).

4. STANDARDS FOR MANAGEMENT OF RECYCLABLE MATERIAL AT CCRC

Upon receipt at CCRC, the recyclable material is evaluated under WAC 173-303-016 and WAC 173-303-017 to determine if it is a solid waste and to determine the disposition pathway for the material. Based on the disposition strategy for the material, it is managed in accordance with applicable regulatory requirements. The following information is provided as an overview of the process for each type of material received at the CCRC.

4.1 Aerosol Products

- Aerosol product cans are sorted into usable and non-usable categories.
- Usable aerosol products are inventoried into the CCRC hazardous material inventory database and stored according to compatibility group.
- Aerosol products that have not been re-deployed to other Hanford Site users within one year of being placed in inventory will be excessed, punctured, or otherwise dispositioned on an annual basis.
- Non-usable aerosol products are punctured and the contents are drained into satellite accumulation area drums containing other compatible materials. These waste liquids are managed according to the requirements of WAC-173-303 with final disposition at a permitted Treatment, Storage, and Disposal (TSD) Facility.
- Empty aerosol product cans will be recycled as scrap metal if practical, according to requirements of WAC 173-303-120(2).

4.2 Mercury and Mercury-Containing Equipment

- Upon receipt at CCRC, mercury and mercury-containing equipment is placed in satellite accumulation containers and is subsequently managed in accordance with WAC 173-303-200 with the CCRC identified as the point of generation.
- Final disposition involves recycling at a permitted TSD Facility where mercury is recovered for re-use.

4.3 Universal Waste Lamps (other than crushed) and Batteries (other than lead-acid)

- Lamps and batteries are managed as universal waste upon receipt at the CCRC in accordance with the large quantity handler provisions contained in WAC 173-303-573.
- The accumulation start date will be marked on the container and will be assigned based on the date the shipment of universal waste is received at the CCRC.
- Universal waste will be shipped from the CCRC within one year of the accumulation start date unless a longer period is necessary to facilitate proper recovery, treatment, or disposal per WAC 173-303-573(22).
- Universal wastes are shipped off-site to a destination facility in accordance with WAC 173-303-573(25).

4.4 Crushed Fluorescent Lamps

- Crushed fluorescent lamps will be managed as non-dangerous or dangerous waste at the CCRC.
- The CCRC will maintain documentation based on process knowledge and/or analytical data when the crushed lamps do not designate as dangerous waste.
- Crushed fluorescent lamps will be sent off-site for recycling.

4.5 Lead-acid Batteries

- Lead-acid batteries consolidated at the CCRC will be managed in accordance with WAC 173-303-520, "Special Requirements for Reclaiming Spent Lead-Acid Battery Waste."
- All lead-acid batteries will be shipped to a battery reclaiming facility when sufficient quantity has aggregated for a cost effective shipment.
- A one time Land Disposal Restriction (LDR) notification is made to the vendor for CCRC managed lead acid batteries.

4.6 Electrical Ballasts or Capacitors

- Electrical ballasts or capacitors will be managed as non-dangerous waste at the CCRC.
- Electrical ballasts or capacitors are accumulated at the CCRC until it is cost-effective to ship them off-site to a recycler.
- The CCRC will maintain documentation based on process and/or analytical data that the electrical ballasts or capacitors do not designate as dangerous waste. (Ballasts or capacitors designated as dangerous waste will not be managed at the CCRC.)
- Electrical ballasts or capacitors that contain batteries will be managed in accordance with Section 4.3 of this plan.

5. STANDARDS FOR MANAGEMENT OF OTHER RECYCLABLE MATERIALS

5.1 Used Shop Towels

In July 1992, the Washington State Department of Ecology issued a Focus sheet with guidance to generators of shop towels. The management of used shop towels will be conducted in accordance with the best management practices identified within this Focus sheet. However, there is one exception to these best management practices regarding the marking of containers as "contaminated shop towels." Hanford workers often associate the term "contaminated" with radioactive contamination. To avoid confusion, the term "used shop towels" will be used at Hanford. The following standards apply for management of used shop towels:

- Recycle containers shall be marked with the words "Recycle Accumulation Area for Used Shop Towels."
- Containers for used shop towels contaminated with hazardous substances must be compatible with the substances present and must be closed except when adding or removing shop towels.
- Accumulation/storage areas for used shop towels that are contaminated with flammable materials must be managed according to Hanford Site contractor procedures. "No Smoking" signs shall be legible and placed at all accumulation areas.
- Used shop towels may NOT be accumulated for longer than 180 days before being recycled. (Currently, the vendor providing laundering services collects used shop towels on a monthly basis.)
- The amount of hazardous substance on used shop towels should be minimized. All free liquids must be removed before placing used shop towels into the accumulation container. Liquids must not be poured into containers of used shop towels. Free liquids must be reused or evaluated for designation and management as dangerous waste.
- No radioactive or PCB contaminated shop towels shall be returned to the commercial laundry service provider.
- The CCRC will manage the Used Shop Towel program for the Hanford Site. This includes establishing contracts or payment methods, reconciling inventories, maintaining a list of participating facilities, and assuring that the off-site recycling facility is meeting local sewer discharge limits and other applicable environmental regulations.

5.2 Used Oil

Used oil recycling services will be available through the CCRC for Hanford Site projects and contractors. The CCRC will manage this contract for generators of "on-specification" or "off-specification" used oil destined for recycling provided that the used oil is not required to be managed as a dangerous waste. It is Hanford's intent that used oil be managed in accordance with all applicable provisions of WAC 173-303-515. The following sections are provided to assist generators and are not intended to be a comprehensive list of regulatory requirements:

- Recycle containers and above ground tanks shall be labeled or marked with the words "Used Oil."
- Storage of used oil in underground storage tanks will be in accordance with WAC 173-360 as applicable.
- Storage of used oil in locations and quantities subject 40 CFR Part 112 shall be in accordance with Spill Prevention, Control and Countermeasures Plan requirements.
- Containers and above ground tanks used to store used oil at generator facilities will be in good condition with no visible leaks.

- Response to a release of used oil to the environment will be in accordance with 40 CFR 279.22.
- Containers will be closed except when adding or removing used oil. Containers and tanks will not be opened, handled, managed, or stored in a manner that may cause the container or tank to leak or rupture.
- The pick up of used oil by an authorized used oil transporter will be performed as needed. The CCRC will coordinate such shipments.
- A completed Radiological Release Certification Form (e.g., HNF-EP-0063 or equivalent) shall accompany each shipment.
- A used oil recycling contract will be managed by the CCRC for Hanford Site projects. This includes establishing contracts or payment methods, reconciling inventories, maintaining a list of participating facilities, and assuring that the off-site recycling facility is meeting all applicable environmental regulations.
- The CCRC will maintain disposal records for three years.
- Used oil will be recycled by an authorized used oil processor or re-refiner.

5.3 Spent Antifreeze

A spent antifreeze recycling contract will be managed by the CCRC for Hanford Site projects and contractors. It is Hanford's intent that spent antifreeze be managed in accordance with all applicable provisions of WAC 173-303-522. The following sections are provided to assist generators and are not intended to be a comprehensive list of regulatory requirements:

- Recycle containers shall be labeled "Spent Antifreeze."
- During accumulation, spent antifreeze will be stored in a manner to prevent releases to the environment. This includes, but is not limited to, storing wastes in compatible containers, on impermeable surfaces, or in secondary containment structures.
- The pick up of spent antifreeze will be performed as needed. The CCRC will coordinate such shipments.
- A completed Radiological Release Certification Form (e.g., HNF-EP-0063 or equivalent) shall accompany each shipment.
- A spent antifreeze recycling contract will be managed by the CCRC for Hanford Site projects. This includes establishing contracts or payment methods, reconciling inventories, maintaining a list of participating facilities, and assuring that the off-site recycling facility is meeting all applicable environmental regulations.
- Proof of reclamation/recycling will be maintained by the CCRC for at least five years from the date of reclamation/recycling.
- Spent antifreeze will be sent to an off-site reclamation/recycling facility.

Appendix A



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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

September 20, 2002

Mr. Joel Hebdon
Regulatory Compliance and Analysis Division
United States Department of Energy
P.O. Box 550, MSIN A5-15
Richland, Washington 99336

Dear Mr. Hebdon:

Re: Page Revision to HNF-EP-0863, the Management Plan for Recyclable Materials
Administered by the Hanford Centralized Consolidation/Recycling Center (CCRC)

The Washington State Department of Ecology (Ecology) has received and reviewed the United States Department of Energy-Richland Operations Office (USDOE) request for a revision of the "Management Plan for Recyclable Materials Administered by Hanford's Centralized Consolidation/Recycling Center" (Management Plan) regarding crushed fluorescents tubes. Ecology concurs with the change proposed. Please proceed with Revision 2 of the Management Plan (HNF-EP-0863).

In regards to Ecology's "Interim Enforcement Policy, Conditional Exclusion for Cathode Ray Tubes and Related Electronic Wastes", Hanford is subject to follow requirements by generators; requirements for generators, including accumulating wastes for no more than one hundred eighty (180) days on site.

Ecology encourages USDOE and Hanford Site contractors to continue reducing environmental risks and applauds your on-going pollution prevention practices and policies.

If you have any questions, please contact Michelle Anderson-Moore at (509) 736-5714.

Sincerely,

Michael A. Wilson, Manager
Nuclear Waste Program

- cc: D.K. Duvon, BHI
- J.T. Quigley, CHG
- B.J. Dixon, FHI ✓
- R.H. Gurske, FHI
- A.G. Misko, FHI
- E. Grohs, PNNL
- K. Niles, OOE
- Administrative Record

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April 2, 2001

Mr. Joel Hebdon, Director
Regulatory Compliance and Analysis
United States Department of Energy
Richland Operations Office
P.O. Box 550, MSIN: A5-58
Richland, Washington 99352

Re: Management Plan for Recyclable Material Administered by the Hanford Centralized Consolidation/Recycling Center (CCRC)

Dear Mr. Hebdon:

The Washington State Department of Ecology received a letter from Mr. Steven H. Wisness on January 16, 2001, requesting concurrence of the referenced Management Plan for Recyclable Material Administered by the Hanford CCRC. It is Ecology's understanding that the United States Department of Energy (USDOE) intends to continue the successful practices for recycling the waste streams as described in the management plan. These activities have been conducted since 1995 as a pilot program with the concurrence of Ecology.

As with the pilot program, Ecology continues to be committed to support the recycling efforts within this program. We find that, based on the demonstrated successful management practices since 1995, there is continued basis for application of enforcement discretion and/or specific regulatory interpretations, which support the activities.

The referenced letter specifically describes the need to delay identification of specific recyclable materials as solid wastes prior to determining their waste status at the CCRC. Contingent on materials being managed within the requirements of the management plan, Ecology continues to support this interpretation. Ecology must stress that this interpretation is applicable only to the waste streams described in the agreed to management plan.

An additional requirement discussed during development of the management plan was the need to ensure adequate training of individuals who generate or manage the recyclable wastes, specifically those which would be classified as "Universal Wastes" described in Washington Administrative Code (WAC) 173-303-573. As you know, Hanford employees are trained in many hazardous waste management requirements. In addition to the requirements of the

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Joel Hebdon
April 2, 2001
Page 2

Hanford Site-Wide Permit and Unit Specific Training Plans, management of Universal Waste adds new training requirements. Ecology discussed these training requirements with USDOE with the conclusion that existing training programs, along with briefings for familiarization with the elements of the management plan, would exceed, or be equivalent to, the Universal Waste training requirements in WAC 173-303-573 (12). Therefore, no specific additional training programs would be necessary in the management plan. This is called to your attention primarily to ensure that USDOE and its contractors understand that maintaining this equivalency is necessary for maintaining Ecology's concurrence with the management plan.

It is Ecology's understanding that upon receipt of this concurrence letter, USDOE will finalize the management plan and it will replace the existing pilot project management documents for the described waste streams. Subsequent updates to the document will be administered using USDOE's document control processes and will require Ecology concurrence. Ecology believes this will provide an adequate process for future maintenance of the management plan.

If you have any questions regarding this letter, please contact Steve Moore in Ecology's Kennewick Office at (509) 736-3023.

Sincerely,



Michael A. Wilson
Program Manager
Nuclear Waste Program

MW:SM

cc: Anna Beard, USDOE-RL
Brian J. Dixon, Dyncorp
Candice Marple, Dyncorp
Roger Bowman, FH
Mary Lou Blazek, OOE
Administrative Record: CCRC

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