



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10 HANFORD PROJECT OFFICE

712 Swift Boulevard, Suite 5
Richland, Washington 99352

April 12, 2001

John P. Sands
U.S. Department of Energy
PO Box 550, SSIN: H0-12
Richland, WA 99352

Re: Regulatory Pathway for Canyon Disposition Initiative

Dear Mr. Sands:

The U.S. Environmental Protection Agency (EPA) and the Washington State Department of Ecology (Ecology) have reached an agreement on the regulatory path forward for the Canyon Disposition Initiative (CDI). The CDI project will continue down the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA) pathway. Our recommendation is that the CDI facility should be used for disposal of Hanford Site remediation wastes under the CERCLA Miscellaneous Unit designation. Ecology reserves the option of adding the disposal unit to the Resource Conservation and Recovery Act (RCRA) Hanford Sitewide Permit at a later date.

The CERCLA Miscellaneous Unit designation permits flexibility in the disposition of CERCLA and RCRA past-practice waste streams. Land Disposal Restrictions (LDRs) would apply substantively, however, the Debris Rule allows for a wide range of waste types that would be available for disposal in the facility. Implementation under CERCLA offers the advantage of limiting disposal to Hanford Site remediation waste streams. The Tri-Party agencies will need to work out the specific technical requirements for a Miscellaneous Unit disposal facility.

We request a meeting with the U.S. Department of Energy (DOE) and its contractors to discuss the regulatory pathway and related issues in more detail. Please feel free to contact Ecology's and EPA's project managers to set up a meeting. You may reach Matt Mills (Ecology) at 736-5721 and Craig Cameron (EPA) at 376-8665.

Craig Cameron
U.S. EPA

Sincerely,

Matt Mills
WA Dept. of Ecology

RECEIVED
APR 17 2001

EDMC

cc: Douglas Sherwood, EPA
Rick Bond, WA DOE
Dave Bartus, EPA
Administrative Record/Canyon Disposition, U-Plant