



Department of Energy

Richland Operations Office
P.O. Box 550
Richland, Washington 99352

95-WPD-014

MAR 29 1995

RECEIVED APR 01 1995

Merilyn B. Reeves, Chairman
Hanford Advisory Board
800 NW Sixth Avenue
Suite 342
Portland, Oregon 97209-3715

Dear Ms. Reeves:

DOE, RICHLAND OPERATIONS OFFICE (RL) RESPONSE TO HANFORD ADVISORY BOARD (HAB) ADVICE ON OFFSITE MIXED WASTE ACCEPTANCE UNDER THE FEDERAL FACILITIES COMPLIANCE ACT (FFCA) PROCESS

- References:
- (1) Ltr. from Hanford Advisory Board to John Wagoner, "Offsite Mixed Waste Acceptance," dtd. February 8, 1995.
 - (2) Ltr. 95-SWT-061, from June M. Hennig (RL) to Jeff Breckel (Ecology) "Mixed Waste Receipt at Hanford from offsite generators under the Federal Facilities Compliance Act (FFCA)," dtd. February 3, 1995.

This letter provides RL's response to the advice received from the HAB on Offsite Mixed Waste Acceptance under the FFCA process specified in Reference 1. The following are RL's responses to the eleven (11) specific criteria that the HAB developed:

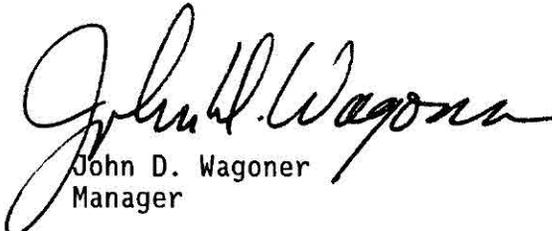
1. All offsite low-level mixed waste (LLMW) receipts at the Hanford Site are in accordance with applicable Hanford permit requirements and are in compliance with Washington Dangerous Waste laws. All waste generators must meet the rigorous requirements of the "Hanford Site Solid Waste Acceptance Criteria," WHC-EP-0063-4, prior to being able to ship waste to the Hanford Site.
2. No LLMW will be received at the Hanford Site from offsite generators unless existing storage capacity is available and it will not have a negative affect on Hanford Site LLMW treatment.
3. This issue has to be addressed in consultation with the State of Washington. RL has sent Reference 2 (attached) to the State requesting a meeting to discuss this issue and other matters concerning offsite mixed waste receipt at Hanford under the FFCA. To date, there has been no official response from the State. RL is willing to work with the State to work out a resolution to this specific issue and some of the following specific responses to the HAB advice.
4. See #3 above.
5. See #3 above.
6. See #3 above.

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7. The review of where treatment facilities should be located has taken place during the FFCA process by the DOE. The proposed treatment configuration has been given considerable technical consideration and will be reflected in the site's Proposed Site Treatment Plans (PSTP), due out on March 30, 1995.
8. See #3 above.
9. "DOE welcomes comments and concerns raised by these in-bound shipments to the Hanford Site. DOE plans to ship this material similar to commercial shipments. Since these shipments are from other DOE sites, DOE will coordinate your concerns through Mr. Larry Blalock, Acting Director, Transportation Emergency Management Division of the Office of Transportation Emergency Management, and Analytical Services located in Washington, D.C. This office will coordinate stakeholder comments affecting multiple DOE sites on transportation emergency planning."
10. RL has disclosed the applicable draft information concerning the types and quantities of mixed wastes proposed to be sent to Hanford for treatment under other sites' Draft Site Treatment Plans. Copies of upcoming PSTPs from all sites that have chosen Hanford treatment facilities for treatment of their mixed waste, will be available in DOE Reading Rooms for public comments after March 30, 1995. FFCA mixed waste requirements are being included in the Programmatic Environmental Impact Statement and should be available for public comment in the near future. States and stakeholder comments will be taken into consideration prior to any finalization of the site's PSTPs.
11. DOE is committed to paying any fees required in accordance with applicable law. The waste acceptance criteria contains no prohibition for payment of appropriate fees.

Please direct any questions that you may have on this subject to E. D. MacAlister, of the Waste Programs Division, on (509) 373-0462.

Sincerely,


John D. Wagoner
Manager

WPD:EDM

Attachments

1. Offsite Mixed Waste Acceptance
2. Mixed Waste Receipt at Hanford from offsite generators under the Federal Facilities Compliance Act (FFCA)

cc w/att: J. Breckel, Ecology
P. Bubar, EM-352

Response to HAB Consensus Advice #13 (February 3, 1995)
Off-Site Mixed Waste Acceptance
Letter from J. Wagoner, DOE, March 29, 1995



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Richland Operations Office
P.O. Box 550
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FEB 03 1995

95-SWT-061

Mr. Jeff Breckel, Special Liaison
State of Washington
Department of Ecology
Mail Stop PV-11
Olympia, WA 98504-7600

MIXED WASTE RECEIPT AT HANFORD FROM OFFSITE GENERATORS UNDER THE FEDERAL FACILITIES COMPLIANCE ACT (FFCA)

Dear Mr. Breckel:

The U.S. Department of Energy, Richland Operations Office (RL) is cooperating with other DOE Sites in development of their Site Treatment Plans (STP) as required by the Federal Facilities Compliance Act (FFCA). In this effort, both DOE-HQ, States, and Hanford Advisory Board (HAB) have developed Protocol, Guidelines and Advice for the receipt of offsite mixed waste at the Hanford Site. These documents contain some contradictory policy issues.

RL needs to discuss these issues with the State of Washington Department of Ecology (Ecology) to resolve the offsite FFCA mixed waste receipt issues for the Hanford Site. Other DOE Sites that have chosen Hanford's mixed waste stabilization treatment must be informed as to what the policy decisions will be concerning pretreatment storage and post-treatment residual management. RL has recently received proposed guidelines from other Sites that contained their plans for treatment of their mixed waste at Hanford. RL needs to expedite a response to these sites to allow them adequate time to include the proper information within their PSTP.

It is recommended that RL and Ecology meet to discuss these issues at the upcoming DOE/NGA FFCA meeting being held in Washington, D.C., on February 7-8, as both parties will be at the meeting, and this would save time and money that would be necessary for both parties to meet at a later date. Your response to this recommendation prior to the above meeting would be greatly appreciated.

Please direct any questions that you may have on this subject to Mr. E. D. MacAlister, of my staff, on 373-0462.

Sincerely,

A handwritten signature in cursive script, appearing to read "June M. Hennig".

June M. Hennig, Director
Waste Programs Division

WMD:EDM