



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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

December 7, 2001

Mr. James E. Rasmussen
United States Department of Energy
Office of River Protection
P.O. Box 450, MSIN: H6-60
Richland, Washington 99352

Dear Mr. Rasmussen:

Re: Letter to Michael-A. Wilson, Washington State Department of Ecology, from James E. Rasmussen, United States Department of Energy, "U.S. Department of Energy Draft Hanford Federal Facility Agreement and Consent Order Submittal of Hazardous Waste Facility Permit Part A Application Form 3 Revision 7 Milestone M-23-21," dated October 30, 2001, 01-OMD-043

The Washington State Department of Ecology (Ecology) reviewed Revision 7 of the Single Shell Tank (SST) Hazardous Waste Facility Permit Part A submitted in the referenced letter. This letter serves as notification that Ecology deems the milestone to be complete, subject to the necessary clarifications below. Ecology will deem the Hazardous Waste Permit Part A Application Form 3 Revision 7 acceptable, provided it is modified to include the clarifications listed below.

- Ecology is not conferring any blanket approval of liquid additions prior to satisfaction of Milestone M-45 requirements. The framework for evaluating addition of liquids for purposes of retrieval from the SSTs is set forth in the Milestone M-45 series. Ecology anticipates that the Functions and Requirements (F&R) documents to be prepared before retrieval of each SST will include sufficient information to allow Ecology to determine if additions of liquids for retrieval will be allowed. Ecology will transmit written approvals or disapprovals for the F&R documents that will include determinations on the addition of liquids. Once Ecology has provided formal approval for liquid additions according to M-45, Ecology may request revisions of the SST system description attached to the Part A. Ecology requests that Section C, Process Codes S02, T01, paragraph 4, sentence 2, item b) be revised to reflect this issue as follows: "Liquids are added for the purposes of retrieval. Retrieval liquids may be added to the SSTs only following appropriate Ecology approvals pursuant to M-45 and any subsequent applicable M-45 milestones."

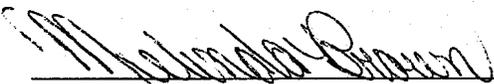
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- Section C, Process Codes S02, T01 paragraph 4, sentence 1 states that treatment occurs when cooling liquids are added to the SSTs. On March 27, 2001, Ecology approved the cessation of psychrometric monitoring of tanks 241-C-105 and 241-C-106,¹ based upon information provided by the Office of River Protection (ORP) affirming that liquids were no longer added to those tanks.² Ecology is aware that the United States Department of Energy (USDOE) designated nine (9) tanks that contain strontium-rich sludge as high heat load tanks; however, those tanks are ventilated to maintain temperatures below Technical Safety Requirements.³ From the information provided, Ecology cannot determine if ORP intends to stop adding cooling water, to resume additions of cooling water, or to document past practices. Clarification is required.
- Same section, process codes and paragraph, sentence 2 states that saltwell pumping transfers may use hose-in-hose overground transfer lines instead of direct buried lines. The hose-in-hose lines are not listed in Table 7 Active Transfer Lines. If the lines are included in the SST system for saltwell pumping, they should be described in Table 7. Ecology assumes that uses of such lines for other than saltwell pumping will be described in system descriptions included in Double Shell Tank Part B permit applications, per Washington Administrative Code (WAC) 173-303-806(4)(c)(iv). Clarification is required.

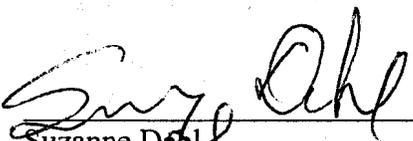
Please submit an edited copy of the Part A, Form 3 to reflect these clarifications within thirty (30) days.

If you have any questions on this matter, please contact Melinda Brown at (509) 736-3027 or Suzanne Dahl at (509) 736-5705.

Sincerely,



Melinda Brown
Tank Waste Storage Project Manager
Nuclear Waste Program



Suzanne Dahl
Tank Waste Disposal Project Manager
Nuclear Waste Program

MB:SD:sb
cc: (see next page)

¹ Letter, Melinda Brown to Mr. Harry L. Boston and Ms. Mary P. DeLozier, "Transmittal of Concurrence with Decision to Cease Collecting Psychrometric Survey Data for Single Shell Tanks 241-C-105 and 241-C-106," dated March 27, 2001.

² Letter, James E. Rasmussen to Mr. Michael A. Wilson, "Cessation of Psychrometric Survey Data Collection From Tanks 241-C-105 and 241-C-106," dated February 26, 2001, 01-OPD-016.

³ HNF-EP-0182, Rev. 154, Table D-1. Temperature Monitoring in Watch List Tanks, pp. D-2 through D-3.

Mr. James E. Rasmussen

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cc: Dave Bartus, EPA
Doug Sherwood, EPA
Joel Hebdon, USDOE
Keith Klein, USDOE
Ellen Mattlin, USDOE
Tony McKarns, USDOE
Mary Burandt, USDOE-ORP
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Pat Sobotta, NPT
Russell Jim, YN
Ken Niles, OOE
Administrative Record: Single Shell Tank Part A



STATE OF WASHINGTON

DEPARTMENT OF ECOLOGY

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CC Recd: 10/28/2002

October 21, 2002

Mr. James E. Rasmussen
Office of River Protection
United States Department of Energy
P.O. Box 450, MSIN: H6-60
Richland, Washington 99352

Dear Mr. Rasmussen:

- Re: (1) Letter, Michael A. Wilson, Washington State Department of Ecology, from James E. Rasmussen, United States Department of Energy, "Transmittal of one Part A, Form 1, and four Part A, Form 3s, to document change in co-operator name from Lockheed Martin Hanford Corporation (LMHC) to CH2M Hill Hanford Group, Inc. (CHG) for four treatment, storage and disposal units," dated December 22, 1999 (00-OSS-105)
- (2) Letter, James E. Rasmussen, United States Department of Energy, from Melinda Brown, Washington State Department of Ecology, dated December 7, 2001
- (3) Letter, Michael A. Wilson, Washington State Department of Ecology, from James E. Rasmussen, United States Department of Energy, "Single-Shell Tank (SST) System Resource Conservation and Recovery Act (RCRA) Part A Form 3 Revision 7 Comment Response," dated January 10, 2002 (02-EMD-002)

The Washington State Department of Ecology (Ecology) has received and reviewed the United States Department of Energy's (USDOE's) Part A Permit Application Revisions (Rev.) (Form 3s) (Reference 1 and 3).

The following modifications are approved: Single-Shell Tank System (SST) Rev. 6, Double-Shell Tank System (DST) Rev. 10, 204-AR Rev. 6, and Grout Treatment Facility Rev. 7. These approved modifications only reflect co-operator name changes.

Ecology reviewed the SST Rev. 7, Part A permit application and provided a response on December 7, 2001 (Reference 2). On January 10, 2002, USDOE provided a response to Ecology comments (Reference 3). Following subsequent discussions, USDOE and Ecology have agreed: (1) to incorporate clarification of liquid additions for the purposes of retrieval and cooling

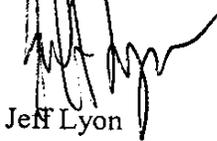
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(Bullets 1 and 2 of December 7, 2001, letter). Retrieval liquids may be added to the SSTs only following appropriate Ecology approvals pursuant to M-45 and any subsequent applicable M-45 milestones; and (2) reference to Hose in Hose Transfer Lines (HIHTL) will not be required in the SST Part A. With this letter, Ecology is denying the SST Rev. 7, Part A application. Ecology requests submission of an updated revision for the SST Part A permit application within 90 days of receipt of this letter.

Until Ecology receives and approves USDOE's HIHTL Management Plan, Ecology will approve the use of HIHTL on a case-by-case basis. USDOE has agreed to submit this plan to Ecology by December 20, 2002, and will include plans for management and final disposition of HIHTLs. The approved HIHTL Management Plan will be maintained in both the SST and DST Operating Record. The SST Closure Plan documentation and the August 2003 DST Part B Permit Application will include, by reference, the HIHTL Management Plan.

If you have any questions or comments regarding this letter, please contact Laura Ruud at (509) 736-5715, Jean Vanni at (509) 736-3046, or myself at (509) 736-3098.

Sincerely,



Jeff Lyon
Tank Waste Storage Project Manager
Nuclear Waste Program

JV: nc

cc: Nick Ceto, EPA
Dave Bartus, EPA
Joel Hebdon, USDOE
Keith Klein, USDOE
Mary Burandt, USDOE-ORP
Woody Russell, USDOE-ORP
Delmar Noyes, USDOE-ORP
Felix Miera, CHG
Phil Miller, CHG
Mark Reiss, CHG
Kathleen Tollefson, CHG
Roger Bowman, FH
Jeff Hertzell, FH
Owen Kramer, FH
Todd Martin, HAB
Richard Gay, CTUIR
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Administrative Record