



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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April 30, 2002

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

Dear Mr. Hebdon:

RE: Letter, Joel Hebdon, USDOE, to Laura Ruud, Ecology, "Dangerous Waste Permit Application Part A, Form 3, Revision 4, for the 600 Area Purgewater Storage and Treatment Facility," dated March 25, 2002.

The Washington State Department of Ecology (Ecology) has received and reviewed the U.S. Department of Energy's (USDOE) request to revise the above-referenced Part A. Ecology is denying USDOE's request because the criteria that allow for changes while operating under interim status standards have not been met pursuant to WAC 173-303-805(7).

USDOE's letter stated that chromium was discovered at levels that exceeded the Toxicity Characteristic Leaching Procedure limit for dangerous waste constituents. Based on that discovery, USDOE proposed a revision to the Part A to include the D007 waste code. However, in order for Ecology to consider the addition of a new waste code, the owner/operator must submit a revised Part A permit application **prior to** such treatment, storage, or disposal (WAC 173-303-805(7)(a)(i)). USDOE did not meet this criterion.

As you know, Ecology and USDOE are preparing the Modification E settlement package for public comment, which includes a proposed date of January 2003 to decide the path forward for the 600 Area Purgewater Storage and Treatment Facility. However, due to the current non-compliant situation at this unit, Ecology requests a meeting to discuss the circumstances that lead to the discovery of chromium, the ongoing waste management practices, as well as possible corrective measures.

Also, for your information, Ecology is currently involved in a policy review of how best to provide regulatory oversight of waste management units not currently included in the operating unit or closure chapters of the site-wide permit, given the fact that the Hanford Facility was issued a final status permit in 1994. This policy review is focusing on those units, such as the

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Purgewater Storage and Treatment Facility, that continue to operate under interim status standards. Ecology hopes to complete this policy review during 2002.

Please contact me at (509) 736-5715 to schedule the meeting or to talk further about this situation.

Sincerely,



Laura Ruud  
Environmental Specialist  
Nuclear Waste Program

LR:nc

cc: Dave Bartus, EPA  
Dennis Faulk, EPA  
Cliff Clark, USDOE  
Roger J. Landon, BHI  
Fred A. Ruck, FH  
Rick Gay, CTUIR  
Russell Jim, YN  
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Mike Dunning, Attorney General's Office