



Department of Energy
Richland Operations Office
P.O. Box 550
Richland, Washington 99352

07-SED-0023

NOV 6 2006

Mr. Michael A. Bussell, Director
Office of Compliance and Enforcement
U.S. Environmental Protection Agency, Region 10
1200 Sixth Avenue, MS OCE-164
Seattle, WA 98101

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Office of Air, Waste & Toxics

Dear Mr. Bussell:

REQUEST FOR AMENDMENT OF THE NORTH LOADOUT PIT SLUDGE TREATMENT SYSTEM RISK-BASED DISPOSAL APPROVAL

- References: (1) EPA ltr. to K. A. Klein, RL, from M. A. Bussell, "Approval of the Toxic Substance Control Act (TSCA) Risk-based Disposal Approval (RBDA) Application for Treatment of Polychlorinated Biphenyls (PCBs) from the Hanford K-Basin North Loadout Pit in T-Plant," dtd. July 1, 2005.
- (2) RL ltr. to R. Kreizenbeck, EPA, from K. A. Klein, "Toxic Substances Control Act Application for Risk-Based Disposal Approval for Treatment of Polychlorinated Biphenyls (PCB) from the Hanford K-Basins North Loadout Pit in T Plant," 05-ESD-0056, dtd. May 19, 2005.

The U.S. Department of Energy, Richland Operations Office (RL) is requesting a change to Condition 5 of the Risk-Based Disposal Approval (RBDA) (Reference 1). This request has been discussed previously with Dave Bartus, U.S. Environmental Protection Agency, Region 10 (EPA). The RBDA discusses notifications and management requirements for the North Loadout Pit (NLOP) sludge treatment system for periods between treatment campaigns, but does not include management requirements during temporary periods of inactivity during a single treatment campaign. RL requests that EPA amend the condition to provide for submittal of a plan for management prior to or during such a period of temporary inactivity within a single treatment campaign. The requirements of the original RBDA would resume when the treatment process resumes. The requested change is, however, fully consistent with the intent of Condition 5. The suggested change for condition 5 text is underlined below:

"Within 60 days of completion of treatment activities under this authorization, RL shall submit to EPA, plans and schedules for either reuse of the treatment system, or for final decontamination and/or disposal of the treatment system. Plans and schedules for re-use shall demonstrate a reasonable certainty and time-frame for reuse, and shall provide for draining of free liquids and securing of valves and connections to prevent unintended spills or releases of PCB remediation waste during periods between active treatments. EPA will incorporate any necessary requirements into this approval through appropriate modifications to approval conditions.

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During temporary periods of inactivity during a single treatment campaign, RL may modify management requirements of the treatment system following submittal of the updated plans and schedules applicable to the period of inactivity. Plans shall specify any RBDA requirements that will not be met during the period of inactivity and describe alternative measures to be taken. The requirements of the original RBDA would recommence when treatment activities resume."

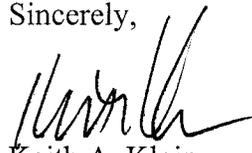
In addition, RL is requesting EPA approval for a current temporary period of inactivity and proposes a process for management actions during future temporary periods of inactivity that might occur throughout the campaign. The treatment system is being used under provisions of an RBDA (References 1 and 2) to solidify K Basin sludge waste from the NLOP and package into 55-gallon containers. The RBDA provides for the treatment of the NLOP sludge, the sand from the K Basin sand filter, and the grouting of the Large Diameter Containers (LDCs) used to transport the waste. Currently, treatment of the NLOP sludge portion of the campaign is complete. Therefore, the NLOP treatment system is currently inactive. RL plans to maintain the treatment system in its current temporary inactive status through the timeframe provided in Condition 1 of the approval through July 1, 2009.

During this temporary period of inactivity, the LDC overpack will not contain an LDC and the drum loading/mixing area enclosure will not contain or handle PCB waste drums. Except for some holdup material in the transfer pump enclosure and the buffer tank, Fluor Hanford, Inc. (FHI) has drained free liquids from the treatment system to the extent practicable and secured valves and connections to prevent unintended spills or releases of PCB remediation waste during this period. RL proposes to deactivate the leak detection probes, and in their place perform a visual check of the system every 30 days. These visual checks will be of areas around treatment system (e.g., the empty overpack, drum loading/mixing enclosure, the buffer tank). For any future periods of inactivity during the campaign, FHI will secure the treatment system as described above.

RL and FHI request a written response from EPA indicating that 1) the amendment to the RBDA and 2) these temporary changes in treatment system management, as described, are acceptable. Once the sand filter sand is transported to T Plant and the treatment system reactivated, the requirements of the original RBDA will resume and the leak detection equipment will be reactivated. Following completion of the full scope of treatment authorized by the RBDA, plans and schedules for final disposal and/or decontamination of the treatment system will be submitted according to Condition 5.

If you have any questions, please contact me or your staff may contact D. S. Shoop, Assistant Manager of Safety and Engineering, at (509) 376-0108.

Sincerely,



Keith A. Klein
Manager

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cc: See Page 3

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cc: D. Bartus, EPA Region X
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