

Pacific Gas and Electric Company

Humboldt Bay Power Plant

TOM A. MOULIA

Plant Manager

1000 King Salmon Avenue

Eureka, CA 95503

707/444-0700

April 2, 1997

PML-97-033



U. S. Nuclear Regulatory Commission

ATTN: Document Control Desk

Washington, D.C. 20555

Docket No. 50-133, OL-DPR-7

Humboldt Bay Power Plant, Unit 3

Gentlemen:

Re: Disposition of Hazardous Waste at IT Panoche and Vine Hill Facilities

This is to confirm the final disposition of specific hazardous wastes shipped to the IT Corporation Panoche (Benicia) and Vine Hill (Martinez) facilities from PG&E's Humboldt Bay Power Plant (HBPP) in July, 1986. The information provided herein is on one of three shipments of hazardous waste containing minute quantities of radioactive isotopes to the IT facilities in the 1980's. Prior to the July, 1986 shipment, approval was granted by the Nuclear Regulatory Commission (NRC) and the California State Department of Health Services, Radiological Health Branch (DHS) to dispose of the wastes as hazardous waste at the Panoche facility.

IT has completed a review of the PG&E shipments and has provided information on the final disposition of the three shipments. The information provided herein is consistent with that provided by IT directly to Ms. Wei-Wei Chui on January 13, 1997 (copy enclosed).

The July 1986 shipment (referred to as Shipment 4 in the enclosure) included four loads of wastewater pond sludge and one load of flyash. On April 25, 1985 PG&E requested NRC approval to dispose of the waste as hazardous waste at the IT Panoche facility. Approval was granted on September 3, 1985 from the NRC. Approval was also granted by the California Department of Health Services on January 21, 1986. The flyash was received at the Panoche facility in July, 1986. The sludge was accepted at the Vine Hill facility, where it was accumulated with other commercial waste. Much of the mixed accumulated solids were routinely removed from Vine Hill and transferred to the Panoche facility for final disposal. IT's records indicate that the solids from at least one load have remained at the Vine Hill facility. PG&E assumes that the Vine Hill facility is the final disposition site for any waste that was not transferred to the Panoche facility.

Should you have any questions concerning this information, please contact me at (707) 444-0700.

Sincerely,

A handwritten signature in cursive script, appearing to read 'Tom Moulia'.

TOM A. MOULIA

9704090288 970402
PDR ADOCK 05000133
P PDR



090074

Enclosure

cc: Mr. Jim Pappas
No. California Permitting Branch Chief
Department of Toxic Substances Control
700 Heinz Ave., Suite 200
Berkeley, CA 94710-2737

Edgar Bailey, Chief
Radiological Health Branch
Department of Health Services
601 North 7th Street
Sacramento, CA 95814

RDudley (NRC)
VEverett (NRC)
SShu (DHS)



4585 Pacheco Boulevard
Martinez, California 94553-2233
510-372-9100
Fax: 510-372-5220

January 13, 1997

HUMBOLDT BAY POWER PLANT			
TEAM MEETING			
DATE	REVIEW	COMMENT	MNC
JAN 17 1997			WEN
			LOW
JAN	PROG	MANU	FOO
BAR	Q1	Q2	LIB
PER	IMP	USE	HAN

Ms. Wei-Wei Chui
Department of Toxic Substances Control, Region 2
700 Heinz Ave., Suite 200
Berkeley, CA 94710-2737

Supplemental Information Requests - IT Panoche Facility
PG&E Humbolt Bay Power Plant Waste Streams

Dear Ms. Chui:

During the public comment period for the draft Environmental Impact Report (EIR) and Closure Plans for the IT Panoche Facility, a question was raised related to certain wastes generated by the PG&E Humbolt Bay Power Plant. The genesis of these comments was an August 23, 1996 letter from PG&E to Mr. Greg Yuhas summarizing waste shipments from Humbolt Bay to the IT Panoche and Vine Hill facilities. Since the close of the public comment period, PG&E has provided clarifying information to DTSC in an October 18, 1996 letter, and to Mr. Yuhas and IT in letters dated October 22, 1996. In addition to this information, DTSC has verbally requested IT provide supplemental information regarding waste shipments to the Panoche facility.

IT has completed a detailed file review of the PG&E shipments and confirmed acceptance and management procedures for each of the specific waste shipments sent by PG&E to either the Vine Hill Complex or Panoche facility. In addition to the information provided to DTSC in PG&E's October 18, 1996 letter, the following detail is provided relative to shipments 3, 4, and 5.

Shipment 3 - Five loads of sludge from the oil water separator were received at the Panoche facility between August 31 and September 5, 1984. This material was sent to Panoche due to the metals concentrations and all five loads were accepted into Waste Management Unit (WMU) 17.

Shipment 4 - This shipment included four loads of wastewater treatment pond sludge and one load of ash deposits from the firebox at the fossil fuel plant. The wastewater pond sludges were all accepted at IT's Vine Hill Complex. Solids from this waste stream accumulated in the Vine Hill surface impoundments along with numerous other solids associated with commercial waste receipts. Much of the mixed accumulated solids were routinely removed from Vine Hill and transferred to the Panoche facility for final disposal in WMUs 17 and 18. The single load of firebox ash was received at the Panoche facility and disposed of in WMU 17 on July 15, 1986.

Shipment 5 - This shipment was sent from Humbolt Bay to the IT Vine Hill Complex. Solids residues from this load were not sent to Panoche; no wastes were received at Panoche after December 1986.

Ms. Wei-Wei Chui

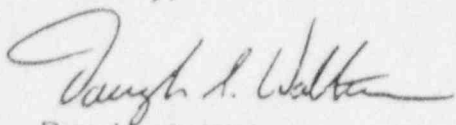
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January 13, 1997

The waste materials shipped to the IT facilities were not considered mixed (radioactive and hazardous) waste. The referenced materials were reviewed for PG&E by both the California State Department of Health Services (DOHS) and the Nuclear Regulatory Commission (NRC), prior to each agency approving shipment to the IT facilities. These agencies approved shipment to IT's Class 1 facilities for disposal because of their hazardous waste characteristics under 40 CFR 261 (primarily metals concentrations). The NRC and DOHS approvals recognized that the wastes were not required to be regulated as radioactive waste subject to the provisions of 10 CFR 20 and 10 CFR 61 because the levels of radioactivity were at or near background levels, and well below regulatory limits.

IT has conducted a further file review of the significant information available regarding waste shipments made to the facility and we are unaware of any other waste materials similar to the PG&E shipments which were accepted at the Panoche facility. As originally indicated in the closure plans, IT believes that no nuclear wastes were managed at the facility. If DTSC identifies any specific waste streams or generators for which you seek additional information, we would be happy to accommodate your requests.

Sincerely,



Douglas S. Waltermire
Manager of Environmental Affairs

cc: Phil Blum, DTSC Glendale
Don Rothenbaum, McLaren/Hart
Kitty Hammer, City of Benicia
Brigitta Corsello, Solano County

NIZ/LTR 97-0007 R11W