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Richland Operations Office
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DEPARTMENT OF ECOLOGY
NWP - RICHLAND

13-ESQ-0074

OCT 11 2013

Ms. J. A. Hedges, Program Manager
Nuclear Waste Program
State of Washington
Department of Ecology
3100 Port of Benton Boulevard
Richland, Washington 99354

Central Files _____
File Name: _____
Cross Reference: _____

Dear Ms. Hedges:

RESPONSE TO CONSENT AGREEMENT AND FINAL ORDER CONCERNING (CAFO) THE SUBMITTAL OF CLOSURE PLANS FOR CLOSING DANGEROUS WASTE MANAGEMENT UNITS (DWMUs)

On June 26, 2013, the U.S. Department of Energy (DOE) and the U.S. Environmental Protection Agency (EPA) executed a CAFO (Docket No: RCRA-10-2013-0113) requiring initiation of closure of several Hanford Site DWMUs. CAFO Section 3.11 identifies the DWMUs affected, and Section 4.4 of the CAFO requires the following:

“b. Within 120 days of the effective date of the Final Order, Respondent shall submit to Ecology a permit modification request in accordance with WAC 173-303-830 for the units listed above in Paragraph 3.11 that includes a written closure plan that satisfies the closure plan requirements at WAC 173-303-610 or, in the event that one or more of the units is duly authorized by a permit for the treatment, storage, and/or disposal of dangerous waste within 120 days of the effective date of the Final Order, then Respondent shall submit a closure plan for those units to Ecology within 120 days of the effective date of the Final Order that satisfies applicable closure plan permit requirements. Respondent also must submit a copy of the closure plan submittals and all subsequent revisions to EPA.”

This DOE letter is submitting the permit modification request, including closure plans for the Treatment, Storage, and Disposal units identified in CAFO Paragraph 3.11, Low Level Burial Grounds Trenches 31-34-94 (Attachment 1), T-Plant Complex (Attachment 2) and the Central Waste Complex-Waste Receiving and Processing (CWC-WRAP), including the 2401W Building (Attachment 3) (CAFO Paragraph 3.13). This permit modification request includes the following:

- Part A permit applications for the unit groups: CWC-WRAP, T-Plant Complex, Low-Level Burial Grounds (LLBG) Trenches 31-34-94
- Closure Plans for the CAFO Paragraph 3.11 units and for Building 2401W (Paragraph 3.13)
- Addendum G Training Plans for the CWC-WRAP, T-Plant Complex, LLBG Trenches 31-34-94

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- Addendum I Inspection Plans for the CWC-WRAP, T-Plant Complex, LLBG Trenches 31-34-94.

DOE requested in a separate letter 13-AMRP-0311, dated September 26, 2013, that Ecology address the additional unit identified in CAFO Paragraph 3.13 (T-Plant Railroad Tunnel) by granting an extension for the submittal of a closure plan. Ecology approved that request in the letter 13-NWP-108, dated October 4, 2013.

A copy of the permit modification request, including copies of the closure plans, is also being submitted to the EPA Region 10 per the CAFO requirements.

A sixty-day public comment period will be held on the permit modification request as required by Washington Administrative Code (WAC) 173-303-830(4)(c)(ii)(A). The notice required by the Permittees in WAC 173-303-830(4)(c)(ii) will be included in the appropriate Hanford Federal Facility Agreement and Consent Order publication or list server, as described in Hanford Facility RCRA Permit Condition I.C.3. A public meeting will be held on December 9, 2013, per WAC 173-303-830(3)(c)(iv).

If you have any questions, please contact me, or your staff may contact Stacy L. Charboneau, Assistant Manager for Safety and Environment on (509) 373-3841

Sincerely,


Matt McCormick
Manager

ESQ:ACM

Attachments

cc w/attachs:

E. Kowalski, EPA Region 10
Ecology NWP Library
Environmental Portal, LMSI, A3-95
Administrative Record, TSD: T-2-7, TS-2-4, D-2-9
HF Operating Record (J. K. Perry, MSA, H7-28)

cc w/o attachs:

D. B. Bartus, EPA
L. T. Blackford, CHPRC
A. E. Cawrse, CHPRC
S. J. Dahl, Ecology
B. J. Dixon, CHPRC
M. N. Jaraysi, CHPRC
S. S. Lowe, Ecology
J. B. Price, Ecology
A. L. Prignano, Ecology
F. A. Ruck III, CHPRC
J. R. Seaver, CHPRC

U.S. Department of Energy, Richland Operations Office Certification

The following certification statement is provided for the submittal of the permit modification package contained in letter 13-ESQ-0074.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.



10/14/13

Matt McCormick, Manager
U.S. Department of Energy
Richland Operations Office

Date

CH2M HILL Plateau Remediation Company (CHPRC) Certification

The following certification statement is provided for the submittal of the permit modification package contained in letter 13-ESQ-0074.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.



John C. Fulton,
President and Chief Executive Officer
CH2M HILL Plateau Remediation Company

10-3-2013

Date