



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

14-ESQ-0096

JUL 09 2014

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

Dear Ms. Hedges:

CLASS 3 MODIFICATION AND TEMPORARY AUTHORIZATION REQUEST FOR THE 325 HAZARDOUS WASTE TREATMENT UNITS (HWTUs) PORTION OF THE HANFORD FACILITY RESOURCE CONSERVATION AND RECOVERY ACT (RCRA) PERMIT

Attached to this letter is a Class 3 (major) permit modification package and a temporary authorization request for addition of three new units (the Cask Handling Area, the Truck Lock, and the 3714 Pad) to the 325 HWTUs Operating Unit Group (OUG) of the Hanford Facility RCRA Permit. This OUG is owned and operated by the U.S. Department of Energy Richland Operations Office (RL) and co-operated by Pacific Northwest National Laboratory (PNNL).

The permit modification is being requested in order to process waste that must be stabilized or otherwise managed in larger containers (e.g., boxes) prior to disposal. The temporary authorization is being requested chiefly to allow RL and PNNL to stabilize, and prepare for disposal, two containers of mixed waste containing barium in excess of land disposal restrictions (LDR) standards. Ecology has previously approved a site-specific LDR variance for this material, but the macroencapsulation container specified in the variance cannot be disposed at the Hanford burial grounds (also as specified in the variance) without placing the macroencapsulated container in a box and filling it with grout to meet anti-subsidence requirements. The LDR variance states that the waste will be treated at the 325 HWTUs prior to disposal. RL and PNNL wishes to process this waste during the current fiscal year rather than continue to store the waste.

The modification package contains the following information:

- Revisions to the unit-specific permit conditions for the 325 HWTUs (Hanford Facility RCRA Permit Part III, OUG 5)
- Revisions to Addenda A, B, C, E, F, G, H, and I of Part 3, OUG 5. (Revision of Addendum J is not needed.)

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- Supplemental information not part of Part III, OUG 5 but required to be included in a major modification request by Washington Administrative Code (WAC) 173-303-830(4)(c)(i)(D). This includes certification statements from RL and PNNL.
- The temporary authorization request containing the information required by WAC 173-303-830(4)(e)(ii)(B).

A redline/strikeout version of the revisions to the unit-specific conditions and the Addenda being revised is available and will be transmitted to your staff electronically. The redline/strikeout also contains a description and rationale for each change.

If you have any questions, please contact me, or your staff may contact Jeffrey A. Frey, Acting Assistant Manager for Safety and Environment, on (509) 376-7727.

Sincerely,



Doug S. Shoop
Acting Manager

ESQ:ACM

Enclosures

cc w/encls:

Administrative Record, TSD: (325 Hazardous Waste Treatment Units, T-3-4) (Hard Copy)
Ecology NWP Library (Hardcopy)
Environmental Portal, LMSI, A3-95 (CD ROM)
HF Operating Record (J. K. Perry, MSA, H7-28) (CD ROM)

cc w/o encls:

C. M. Andersen, PNNL
G. Bohnee, NPT
F. W. Bond, Ecology
S. L. Dahl-Crumpler, Ecology
S. Harris, CTUIR
R. Jim, YN
T. M. McDermott, PNSO
A. L. Prignano, Ecology
H. T. Tilden, PNNL