

207-A South Retention Basin  
Temporary Authorization Request

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207-A South Retention Basin Temporary Authorization Request

The U.S. Department of Energy (DOE), Richland Operations Office (RL) and CH2M Hill Plateau Remediation Company (CHPRC) (hereinafter referred to as the Permittees) are requesting that the Washington State Department of Ecology (Ecology) grant a temporary authorization to implement a Class 3 permit modification. The permit modification request provides for incorporation of the 207-A South Retention Basin into Part V of the Hanford Facility Dangerous Waste Permit. The 207-A South Retention Basin is an inactive surface impoundment with closure addressed through milestone M-037-10 of the Hanford Federal Facility Agreement and Consent Order.

A closure plan is being submitted with the permit modification request. A temporary authorization to conduct closure activities prior to final approval of the closure plan is hereby requested with a term of 180 days. To allow field activities to commence as soon as possible, authorization is requested by July 15, 2015.

The closure plan was developed in a collaborative effort with Ecology staff and initiation of closure is believed to be in the best interests of the permittees, regulators, and the public.

This attachment reiterates the temporary authorization requirements outlined in the WAC **in bold** and provides the required information.

**WAC 173-303-830(4)(e) Temporary authorizations.**

- (i) Upon request of the permittee, the director may, without prior public notice and comment, grant the permittee a temporary authorization in accordance with this subsection. Temporary authorizations must have a term of not more than one hundred eighty days.**

The Permittees are requesting a temporary authorization for a full term of 180 days. The temporary authorization is needed to perform field work associated with the 207-A South Retention Basin closure plan.

- (ii)(A) The permittee may request a temporary authorization for:**  
**(II) Any Class 3 modification that meets the criteria in (e)(iii)(B)(I) or (II) of this subsection**

The Permittees are requesting a temporary authorization request that meets the criteria of **WAC 173-303-830(e)(iii)(B)(I) to facilitate timely implementation of closure or corrective action activities.** A temporary authorization to implement this change will allow performance of 207-A South Retention Basin closure activities.

- (ii)(B) The temporary authorization request must include:**

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**(I) A description of the activities to be conducted under the temporary authorization:**

Specific activities included in this temporary authorization request are described in the 207-A South Retention Basin Closure Plan submitted with the June 2015 permit modification request. Those activities include:

- Removal and disposal of the retention basin and underlying soil;
- Collection of soil samples below the basin footprint to verify that cleanup standards have been met;
- Laboratory analysis of samples;
- Data review to confirm that MTCA (WAC 173-340) Method B clean-closure standards are met;
- Remove any contaminated environmental media present if detected during initial sampling;
- Resample, as necessary, to confirm that clean-closure levels have been met.

**(ii)(B) The temporary authorization request must include:**

**(II) An explanation of why the temporary authorization is necessary**

The temporary authorization is necessary to expedite the clean closure of this site. Hanford Site priorities have made funding available now. These changes have been discussed with the Ecology and a temporary authorization is needed to allow the work to move forward in a timely manner.

**(ii)(B) The temporary authorization request must include:**

**(III) Sufficient information to ensure compliance with the standards in WAC 173-303-280 through 173-303-395 and WAC-173-303-600 through 173-303-680**

The 207-A South Retention Basin was emptied in 1987 and has not been used since that time. The requirements addressed in WAC-173-303-280 through 173-303-395 and WAC-173-303-600 through 173-303-680 cover a wide range of requirements for facilities that store, treat, or dispose of dangerous wastes. Many of those standards are not applicable. Standards that are applicable will continue to be met during the closure activities. Facility recordkeeping and reporting requirements are addressed in the closure plan and will be followed.

**(ii)(C) The permittee must send a notice about the temporary authorization request to all persons on the facility mailing list maintained by the director and to appropriate units of state and local governments as specified in WAC 173-303-840 (3)(e)(i)(D). This notification must be made within seven days of submission of the authorization request.**

The notice for the temporary authorization is being made with the notification for the permit modification request and will thus be within 7 days after transmitting the request to Ecology.

**U.S. Department of Energy, Richland Operations Office and CHWM HILL Plateau Remediation Company Certification**

The following certification statement is provided for the submittal of the 207-A South Retention Basin Closure Plan contained in letter 15-AMRP-0228.

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.

*W.E. Kaly*  
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For John A. Ciucci, President  
and Chief Executive Officer  
CH2M HILL Plateau Remediation Company

*6-24-15*  
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Date

*Stacy L. Charboneau*  
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Stacy L. Charboneau, Manager  
U.S. Department of Energy  
Richland Operations Office

*6/25/15*  
\_\_\_\_\_  
Date