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Richland Operations Office
P.O. Box 550
Richland, Washington 99352

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DEPARTMENT OF ECOLOGY
NWP - RICHLAND

JAN 14 2014

14-AMRP-0075

ENTERED

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

Central Files HSWP/Class I & II mod's
File Name: _____
Cross Reference: _____
X LERF
Acc Area ETF

Dear Ms. Hedges:

PROPOSED CLASS 2 RESOURCE CONSERVATION AND RECOVERY ACT (RCRA)
PERMIT MODIFICATIONS AT THE HANFORD FACILITY LIQUID EFFLUENT
RETENTION FACILITY AND 200 AREA EFFLUENT TREATMENT FACILITY
(LERF/ETF) AND TEMPORARY AUTHORIZATION REQUEST

The U.S. Department of Energy Richland Operations Office (RL) as owner/operator and CH2M HILL Plateau Remediation Company (CHPRC) as the co-operator (hereinafter referred to as the Permittees) are proposing Class 2 modifications to unit specific addendums of the LERF/ETF permit.

The Permittees are requesting Class 2 modifications per WAC 173-303-830(4)(b) for the following LERF/ETF permit addendums:

- Addendum C, Process Information
- Addendum F, Preparedness and Prevention
- Addendum I, Inspection Requirements

This modification request proposes to revise three addenda of the LERF/ETF Hanford Facility RCRA Permit by updating the frequency at which specified alarms, leak detectors, and level/pressure indicators are monitored. In addition, modifications are proposed that allow for an additional leachate monitoring method to be used to calculate the action leakage rate. A detailed summary table of the proposed LERF/ETF RCRA modifications is attached to this request that identifies the specific modifications requested, and also provides the justifications for the various changes from WAC 173-303-830 Appendix I. A red-line strikeout of the previous versions of these attachments outlining the proposed changes is also submitted with this request.

Ms. J. A. Hedges
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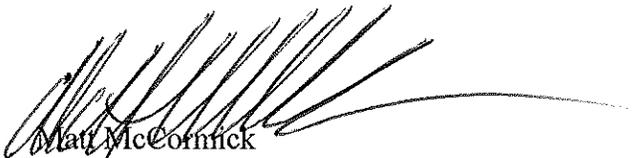
JAN 14 2014

The Permittees are requesting a temporary authorization (TA) that meets the criteria of WAC 173-303-830(4)(e)(iii)(B)(III) to prevent disruption of ongoing waste management activities. A temporary authorization to implement the requested Class 2 modifications to the Permit will allow the reduction from daily monitoring to proceed when no aqueous waste transfers or ETF processing operations are occurring. This will allow personnel to focus on more critical environmental and operational activities during the planned facility downtime in February thru April 2014, specifically to focus on the LERF cover cleanup effort. A temporary authorization request that provides additional information and justification for this TA is attached to this permit modification request. In the change summary table, the changes that are requested for a TA are identified; only those changes are requested for the TA.

The notice required by the Permittees in WAC 173-303-830(4)(e)(ii)(C) 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.

If you have any questions, please contact me, or your staff may contact Ray Corey, Assistant Manager for the River and Plateau, on (509) 373-9971.

Sincerely,



Matt McCormick
Manager

AMRP:MSC

Attachments

cc: See Page 3

Ms. J. A. Hedges
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cc w/attachs:

D. B. Bartus, EPA
G. Bohnee, NPT
F. W. Bond, Ecology
R. Buck, Wanapum
S. L. Dahl-Crumpler, Ecology
D. A. Faulk, EPA
S. Harris, CTUIR
R. Jim, YN
S. Hudson, HAB
K. Niles, ODOE
D. Rowland, YN
E. R. Skinnerland, Ecology
Administrative Record (LERF/ETF, TSD: S-2-8)
Environmental Portal
Ecology Library

cc w/o attachs:

L. M. Dittmer, CHPRC
R. H. Engelmann, CHPRC
R. A. Kaldor, MSA
T. W. Noland, MSA
R. E. Piippo, MSA
J. R. Seaver, CHPRC