



Stephanie Schleif
Washington Department of Ecology
3100 Port of Benton Blvd.
Richland, WA 99354

2014-LTR-1005
May 1, 2014

Ms. Linda Meyer
US EPA – Region 10
1200 Sixth Ave, Ste. 900, AWT-121
Seattle, WA 98101

Re: Perma-Fix Northwest Richland, Inc.
Site Identification Number WAR000010355
Mixed Waste Facility (MWF)
Temporary Authorization Request (TAR) for Permit Modification Request 134
Replacement of the In-Container Mixer & Clarification on Wastestream Processing

Dear Ms. Schleif & Ms. Meyer,

Perma-Fix Northwest Richland, Inc. (PFNW-R) is requesting a Temporary Authorization approval in accordance with WAC 173-303-830(4)(e)(ii)(A)(II) to replace the permitted miscellaneous treatment unit In-Container Mixer (ICM) and to start treatment of raw sludge and solid phase waste in the ICM per permit modification request 134. Given immediate compliance concerns, a TAR is being submitted to prevent disruption of ongoing waste management activities, further protect human health and the environment, and avoid interruption of immediate business needs.

Description of Activities

If this temporary authorization request (TAR) is approved, PFNW-R will continue with the installation of the new ICM in accordance with (IAW) permit condition V.C and WAC 173-303-640(3) and as agreed in WDOE's letter 14-NWP-027, dated February 5, 2014. In addition, PFNW-R shall clarify the language in the Permit and Attachments on the ability to process raw sludge and solid-phase wastes stored in the Waste Storage Building directly in the ICM. Moreover, the proposed revisions to the drawings show that all Treatment Line 200 Series wastes can be treated directly in the ICM. PFNW-R will submit a certification for the installation of the ICM IAW permit condition V.C.1. PFNW-R will also send to Ecology prior to treatment of mixed waste or mixed TSCA-regulated PCB waste a letter signed by PFNW-R and a registered professional engineer stating that the facility has been modified in compliance with the permit. In addition, Ecology will inspect the modified facility and find it is in compliance with the conditions of the permit or Ecology will waive the inspection, or has not within fifteen (15) days notified PFNW-R of intent to inspect in accordance with permit condition I.D.9. Finally after the steps are met, PFNW-R will commence treatment of mixed waste as detailed in PMR 134.

Justification for TAR

PFNW-R is requesting this TAR in accordance with WAC 173-303-830(4)(e)(iii)(B)(II) and (III). PFNW-R currently has a waste stream on-site that, if not treated in the ICM will exceed the permit

condition found under Sect. 4.2 of the Waste Analysis Plan (Attachment CC of the Permit) which says, waste will be treated and shipped off site "...within 365-days after waste receipt or generation." Due to the potential for radiological contamination, this waste stream cannot be processed in any of the other approved processes currently permitted and needs to be treated in the replaced ICM.

Should you have any questions regarding this matter, please contact me at (509) 375-7026 or Barry Nichols at (509) 375-7001.

Thank you,



Richard Grondin
Perma-Fix Northwest Richland, Incorporated
Vice President and General Manager

Enclosure

1. Certification Statement

Cc:

Rick Bond	WDOE
Andrea Prignano	WDOE

2014-LTR-1005

Enclosure 1

Certification Statement

The following certification statement fulfills the requirements of Hazardous Waste Management Act, in accordance with WAC 173-303-810(13)(a), and Toxic Substance Control Act, in accordance with 40 CFR 761.3, for Perma-Fix Northwest Richland, Inc. permit for the Storage and Treatment of Mixed Waste and for the Storage and Disposal of Mixed-Toxic Substance Control Act (TSCA) Regulated Polychlorinated Biphenyl (PCB) Wastes.

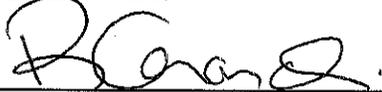
The certification below covers the documentation and submission of the information submitted in letter No. 2014-LTR-1005, dated May 1, 2014.

As the Vice President/General Manager of the Mixed Waste Facility, I have the authority to certify on behalf of the corporation.

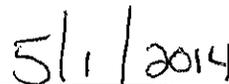
HWMA CERTIFICATION
[WAC 173-303-810(13)(a)]

“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.”

PFNW-R Inc.



Richard Grondin Vice President/General Manager



Date: May 1, 2014