



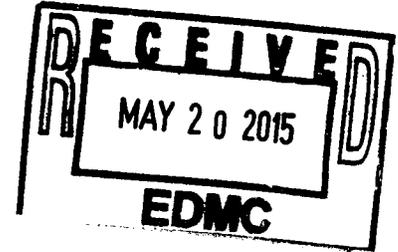
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Department of Energy
Richland Operations Office
P.O. Box 550
Richland, Washington 99352

MAY 15 2015

15-ESQ-0072

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

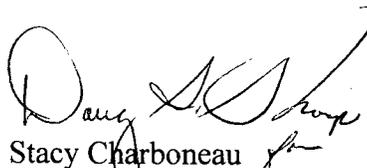


Dear Ms. Hedges:

DETERMINATION OF PERMIT MODIFICATION CLASS FOR CHANGES TO HANFORD FACILITY RESOURCE CONSERVATION AND RECOVERY ACT (RCRA) PERMIT

This letter transmits a request for a permit modification class determination, pursuant to the Washington Administrative Code, Section 173-303-830(4)(d). The U.S. Department of Energy will be proposing modifications to the Hanford Facility RCRA Permit Legal Description and Operating Boundary. The proposed modifications will reduce the foot print of the permitted contiguous facility by approximately 1,641 acres. This letter is intended to formally request and document the permit modification class determination as a Class 1-Prime. Enclosed is information to support this request. 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,


Stacy Charboneau
Manager

ESQ:ACM

Enclosures

cc: See page 2

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cc w/encls:

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J. B. Price, Ecology
D. Rowland, YN
R. R. Skinnarland, Ecology
H. T. Tilden, PNNL
M. B. Wilson, MSA
Administrative Record, TSD: H-0-1
Ecology NWP Library
Environmental Portal, LMSI, A3-95
Gonzaga University, Foley Center Library
HF Operating Record (J. K. Perry, MSA, A3-01)
Portland State University, Government Information
U.S. Department of Energy, Public Reading Room,
Washington State University, Tri Cities, Consolidated
Information Ctr.
University of Washington, Suzzallo Library,
Govt Publications Department

Request for Permit Modification Class Determination

1.0 PURPOSE

The purpose of this document is to request a permit modification class “*determination*,” per Washington Administrative Code (WAC) 173-303-830(4)(d). Specifically, the U.S. Department of Energy (DOE) is hereby requesting the Washington State Department of Ecology (Ecology) concurrence to process changes to the Hanford Facility Resource Conservation and Recovery Act (RCRA) permit as a Class 1-Prime modification.

2.0 BACKGROUND

DOE will be proposing modifications to the Hanford Facility Legal Description and Operating Boundary (RCRA Permit Attachment 2). The modifications will reduce the overall foot print of the permitted contiguous Facility by approximately 1,641 acres. The enclosed map (Enclosure 2) illustrates the general location of acreage to be excluded from the Hanford Facility Legal Description and Operating Boundary. A legal land description of the actual parcel will be provided as soon as available.

Under the dangerous waste regulations, permit modification requirements are categorized as Class 1, 2, or 3. WAC, Section 173-303-830(4)(d)(i) states:

In the case of modifications not explicitly listed in Appendix I of this section, the permittee may submit a Class 3 modification request to the department, or he or she may request a determination by the director that the modification should be reviewed and approved as a Class 1 or Class 2 modification. If the permittee requests that the modification be classified as a Class 1 or 2 modification, he or she must provide the department with the necessary information to support the requested classification.

3.0 INFORMATION TO SUPPORT REQUEST

The information in the following subsections is intended for Ecology use and consideration in determining the permit classification per WAC 173-303-830(4)(d).

3.1 Impact to Permit Requirements

The proposed changes will minimally impact permit requirements/conditions. There are no treatment, storage, or disposal unit groups located on the subject parcel. Accordingly unit-specific permit requirements/conditions are not impacted. Additionally, the changes would not alter sitewide permit requirements with the exception of Attachment 2 (Hanford Facility Legal Description and Operating Boundary).

3.2 Corrective Action

The proposed changes involve land that has undergone investigation and cleanup per permit condition II.Y.

3.3 Capacity to Protect Human Health or the Environment

The proposed changes will not reduce the capacity of the Facility to protect human health or the environment. The Hanford contiguous Facility encompasses over 500 square miles of property. Much of the property is not used for dangerous waste management activities. The parcel to be excluded from the Permit Legal Description and Operating Boundary represents a small percentage of the overall contiguous Facility and is not used for dangerous waste management. Also, the subject parcel does not serve as a substantial barrier to reduce access to parts of the Facility where dangerous waste management activities occur. Hence, the changes will not reduce the Facility's capacity to limit access to the regions where dangerous waste is actively managed.

3.4 Dangerous Waste Handling

The proposed permit modification involves land that does not contain historical reactor or operational areas. Furthermore, the land is not currently used for dangerous waste handling activities.

4.0 Summary

The information supplied above is intended for Ecology's use and consideration. DOE understands that Ecology has responsibility to determine the permit modification classification based on information supplied by the permittee per WAC 173-303-830(4)(d). If Ecology has questions or additional information needs, please contact Tony McKarns at 376-8981 or Randall Krekel at 376-4264.

General Location of 1,641 acres to be excluded from the Hanford Facility Resource Conservation and Recovery Act (RCRA) Permit.

