



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

0055971

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DEC 12 2001

Mr. Michael A. Wilson, Program Manager
Nuclear Waste Program
State of Washington
Department of Ecology
P.O. Box 47600
Olympia, Washington 98504

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Dear Mr. Wilson:

**HANFORD FACILITY RESOURCE CONSERVATION AND RECOVERY ACT (RCRA)
PERMIT MODIFICATION AND REQUEST FOR TEMPORARY AUTHORIZATION FOR
POSTCLOSURE MONITORING AT THE 300 AREA PROCESS TRENCHES**

The U.S. Department of Energy, Richland Operations Office (RL), requests a permit modification in accordance with Washington Administrative Code (WAC) 173-303-830, which includes changes determined to be a Class 2 Modification. RL is requesting the State of Washington Department of Ecology (Ecology) grant a temporary authorization to implement these changes for a period of 180 days as specified in WAC 173-303-830(4)(e). The permit modification request is expected to be processed in the next modification cycle of the Hanford Facility RCRA Permit, Dangerous Waste Portion (ID# WA7890008967).

The documentation changes associated with the permit modification and temporary authorization reflect revisions being made to the RCRA groundwater monitoring program for the 300 Area Process Trenches (Part VI, Chapter 1). The enclosed Groundwater Monitoring Plan for the 300 Area Process Trenches (PNNL-13645), Enclosure 1, has been revised to incorporate changes to the groundwater monitoring network, to introduce a statistical approach for calculating control limits and to implement the corrective action monitoring plan for the unit.

A temporary authorization request, in accordance with WAC 173-303-830(4)(e)(ii)(B), must include the following:

1. A description of the activities to be conducted under the temporary authorization;
2. an explanation of why the temporary authorization is necessary; and
3. sufficient information to ensure compliance with the standards in WAC 173-303-280 through 173-303-395 and 173-303-600 through 173-303-680.

DEC 12 2001

Under a temporary authorization, RL would implement PNNL-13645 by adding five wells to enhance the area to be monitored down gradient of the process trenches; and eliminate groundwater sampling at two background wells. Additionally, the new statistical approach would be implemented, with the objective of determining whether the concentrations of the constituents of concern are decreasing with time as expected in the 300-FF-5 Record of Decision. The approach has been approved by Dr. D. Goswami, of your staff (refer to Enclosure 2, the letter dated May 7, 2001). By granting a temporary authorization, Ecology will allow RL to implement PNNL-13645. This temporary authorization would not affect the 300 Area Process Trenches compliance with the standards in WAC 173-303-280 through 173-303-395 and 173-303-600 through 173-303-680. The trenches are undergoing postclosure monitoring, and will maintain compliance with the enforceable portions of the 300 Area Process Trenches Modified Closure Plan, DOE/RL-93-73.

To request a temporary authorization, RL is required by WAC 173-303-830(4)(e)(ii)(C) to send a notice addressing the temporary authorization request to all persons on the facility mailing list. Enclosure 3 contains language that will be included in the December "Hanford Update" to satisfy the notice requirement. Enclosure 4, is a copy of the permit modification form that will be submitted with the next permit modification cycle.

RL requests that Ecology review the enclosed information, and if Ecology determines that the request is acceptable, please respond with a letter granting the temporary authorization. Should you have any comments or questions, please contact Gloria Williams of my staff, on (509) 372-0586, or Marvin J. Furman, GWVZ, on (509) 373-9630.

Sincerely,



Joel B. Hebdon, Director
Regulatory Compliance Analysis Division

RCA:GAW

Enclosures

cc w/encls:

J. V. Borghese, BHI
D. Goswami, Ecology
M. Goldstein, EPA
R. Jim, YN
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S. A. Thompson, FHI
Administrative Record, H6-08
Ecology Library, Kennewick
Environmental Portal LMSI