



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

20-PFD-0057

October 14, 2020

Mr. David Einan, Manager
Office of Environmental Cleanup
Site Cleanup Unit 4
U.S. Environmental Protection Agency
825 Jadwin Avenue, Suite 210
Richland, Washington 99352

Dear Mr. Einan:

EXTENSION REQUEST FOR THE CONTINUED OPERATION OF THE EXISTING STAGING AREA AT THE ENVIRONMENTAL RESTORATION DISPOSAL FACILITY

In accordance with the provisions of the Environmental Restoration Disposal Facility (ERDF) Record of Decision (ROD) Amendment signed on January 31, 2002, CH2M HILL Plateau Remediation Company (CHPRC) has a previously established staging area at the ERDF to allow for staging of remediation waste for treatment prior to disposal. The staging area that has been approved is located on the south side of ERDF near the concrete batch plant.


Waste was first placed in the staging area in June 2012, and the U.S. Environmental Protection Agency (EPA) has approved extensions of the operating period in accordance with provisions invoked by the ROD amendment. The current operating period of the staging area will expire on November 28, 2020. Because the Department of Energy has identified an ongoing need for remediation wastes to be managed and treated in the staging area, we request your approval to continue operating the existing staging area until November 28, 2023.

In accordance with regulations [40 CFR 264.552 (f)(2)] pertaining to storage Corrective Action Management Units (CAMUs) invoked by the ROD amendment, operation of the ERDF staging area in excess of 2 ½ years is subject to groundwater monitoring, corrective action, and liner requirements or alternatives associated with disposal CAMUs. Due to the location of the staging area, the current ERDF groundwater monitoring program is considered adequate to provide appropriate monitoring for the staging area. Liner requirement alternatives will be satisfied by continuing to manage liquid wastes in accordance with the ROD amendment provisions for the staging area; non-liquid wastes within the staging area will be inspected weekly and any releases observed will be immediately cleaned up and reported to EPA.

If you have any questions please contact me, or your staff may contact Brian Stetter of my staff, on (509) 376-5828.

Sincerely,

Mark S.
French

 Digitally signed by Mark S.
French
Date: 2020.10.14 10:31:05
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Mark S. French, Director
Project and Facilities Division
Richland Operations Office

PFD:BAS

cc:

J. Bell, NPT
R. Buck, Wanapum
L. Contreras, YN
B. L. Lawrence, CHPRC
S. G. Austin, CHPRC
S. L. Brasher, MSA
S. W. Davis, MSA
S. Leckband, HAB
N. M. Menard, Ecology
M. Murphy, CTUIR
S. E. Parnell, CHPRC
S. N. Schleif, Ecology
A. K. Smith, Ecology
M Woods, ODOE
C Cameron, EPA
Administrative Record (ERDF)
Environmental Portal