



**U.S. Department of Energy
Hanford Site**

March 3, 2021

21-ESQ-000616

Mr. David Bowen, Program Manager
Nuclear Waste Program
Washington State Department of Ecology
3100 Port of Benton Boulevard
Richland, Washington 99354

Dear Mr. Bowen:

**SUBMITTAL FOR TEMPORARY AUTHORIZATION TO IMPLEMENT CLASS 3
MODIFICATION FOR CONSTRUCTION OF THE STORAGE AND TREATMENT PADS
AT THE INTEGRATED DISPOSAL FACILITY OPERATING UNIT GROUP 11**

The U.S. Department of Energy, Richland Operations Office (RL) is requesting a Temporary Authorization (TA) from the Washington State Department of Ecology to implement a previously submitted Class 3 Permit Modification Request in response to our December 6, 2019, letter 20-AMRP-0007, on Submittal of Hanford Facility Dangerous Waste Integrated Disposal Facility (IDF) Operating Unit Group 11 Permit to allow construction activities to begin for the IDF Treatment and Storage Pads.

This letter transmits the TA request for the IDF that meets the criteria of Washington Administrative Code 173-303-830 (4)(e)(iii)(B)(III). The Permittees are requesting a TA for a full term of 180 days. To facilitate the timely implementation of construction activities, authorization is requested by March 30, 2021.

If you have any questions, please contact me, or your staff may contact Glyn D. Trenchard, Acting Assistant Manager for Safety and Environment, RL, on (509) 373-4016.

Sincerely

Brian T. Vance Digitally signed by Brian T. Vance
Date: 2021.03.03 10:04:46 -08'00'

Brian T. Vance
Manager

ESQ:DBC

Attachment

cc: See page 2

cc w/attach:

D. B. Bartus, EPA

J. Bell, NPT

R. Buck, Wanapum

L. C. Buelow, EPA

C. E. Cameron, EPA

S. L. Dahl-Crumpler, Ecology

D. R. Einan, EPA

M. E. Jones, Ecology

L. Contreras, YN

M. Murphy, CTUIR

M. Woods, ODOE

S. N. Schleif, Ecology

N. W. Ware, Ecology

Administrative Record (TSD: D-2-11)

Ecology NWP Library

Environmental Portal

HF Operating Record (J. K. Perry, HMIS)

Attachment
21-ESQ-000616

INTEGRATED DISPOAL FACILITY UNIT GROUP 11
TEMPORARY AUTHORIZATION REQUEST

3 pages including cover sheet

Integrated Disposal Facility

The U.S. Department of Energy, Richland Operation Office and Central Plateau Cleanup Company (hereinafter referred to as the Permittees) are requesting that the Washington State Department of Ecology (Ecology) grant a temporary authorization to implement a previously submitted Class 3 Permit Modification Request to the Integrated Disposal Facility (IDF) Unit Group 11 Permit to allow construction activities of the IDF Treatment and Storage Pads to begin.

The Permittees have discussed the Permit Modification Request (PMR) changes with Ecology during the PMR development. Initiation of construction activities for the IDF Treatment and Storage Pads is a high priority in order to support the Direct Feed Low-Activity Waste (DFLAW) mission through acceptance, storage, and disposal of the mixed low-level waste generated at the Hanford Site Waste Treatment and Immobilization Plant (WTP). A temporary authorization is requested pursuant to Washington Administrative Code (WAC) 173-303-830(4)(e) for the previously submitted modification.

This attachment reiterates the temporary authorization requirement outlined in WAC 173-303 **in bold** and provides the required information. To facilitate the timely implementation of construction activities, authorization is requested by March 30, 2021.

WAC 173-303-830(4)(e) Temporary Authorizations.

- (i) Upon request of the permittee, the director may, without prior public notice and comment, grant the permittee a temporary authorization in accordance with this subsection. Temporary authorizations must have a term of not more than one hundred eighty days.**

The Permittees are requesting a temporary authorization for a full term of 180 days. The Permittees need the temporary authorization to initiate IDF Treatment and Storage Pad construction activities.

- (ii)(A) The permittee may request a temporary authorization for:**

(II) Any Class 3 modification that meets the criteria in (e)(iii)(B)(I) or (II) of this subsection or that meets the criteria in (iii)(B)(III) through (V) of this subsection and provides improved management or treatment of a dangerous waste already listed in the facility permit.

The Permittees are requesting a temporary authorization that meets the criteria of WAC 173-303-830(4)(e)(iii)(B)(III) to prevent disruption of ongoing waste management activities.

Preparing IDF for operations is an integral step in the start-up of DFLAW. The mixed low-level waste from WTP will be transported to the IDF Treatment and Storage Pads, awaiting disposal. Constructing the Treatment and Storage Pads will prevent disruption of ongoing waste management activities.

(ii)(B) The temporary authorization request must include:

(I) A description of the activities to be conducted under the temporary authorization;

Specific activities for the temporary authorization request are the construction of the Treatment and Storage Pads. The technical information in the IDF dangerous waste permit modification request (REG-1089) and supplemental information (20-ESQ-0069), provide the required regulatory information specific to the construction of the pads.

(ii)(B) The temporary authorization request must include:

(II) An explanation of why the temporary authorization is necessary

Initiation of construction activities for the IDF Treatment and Storage Pads supports Tri-Party Agreement Milestone series M-062-57. This Milestone addresses the operational start-up of IDF necessary to support DFLAW. To ensure IDF readiness in Calendar Year 2022, the Permittees are requesting a temporary authorization to start construction of the IDF Treatment and Storage Pads. Performing construction during the spring and summer months is most conducive to proper curing, and minimizes the risk for weather-related construction delays. Starting construction of the pads in spring of 2021 will ensure structural integrity of the pads and guarantee timely completion of the facility modifications needed to support DFLAW.

(ii)(B) The temporary authorization request must include:

(III) Sufficient information to ensure compliance with the standards in WAC 173-303-280 through 173-303-395 and WAC 173-303-600 through 173-303-680

The requirements addressed in WAC 173-303-280 through WAC 173-303-395 and WAC 173-303-600 through WAC 173-303-680 cover a wide range of facilities that store, treat, or dispose of dangerous wastes. The IDF PMR and Appendix C9 of the IDF permit include design drawings, construction specifications, and other details needed to prevent hazards to human health and the environment.

(ii)(C) The permittee must send a notice about the temporary authorization request to all persons on the facility mailing list maintained by the director and to appropriate units of state and local governments as specified in WAC 173-303-840(3)(e)(i)(D). This notification must be made within seven days of submission of the authorization request.

Permit Condition I.C.3.c allows for the use of Hanford Federal Facility and Consent Order Community Relations Plan publications and/or list servers for public involvement to satisfy the notification requirements for temporary authorization requests required under WAC 173-303-830(4)(e)(ii)(C). The public notice for the temporary authorization request will be issued within 7 days after transmittal of the request to Ecology.