



U.S. Department of Energy Hanford Site

March 18, 2021

21-ESQ-000802

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 OF THE REQUEST TO REMOVE THE LEACHATE MONITORING PLAN AND SUB-SURFACE LIQUIDS MONITORING AND OPERATIONS PLAN FROM PERMIT MODIFICATION C3-IDF-2019-01

- References:
1. Ecology letter from S. Schleif to B. T. Vance, RL, and T. L. Blackford, CHPRC, "Department of Ecology's (Ecology) Completeness Determination for the Operations Class 3 Permit Modification for the Hanford Facility Resource Conservation and Recovery Act Permit, Dangerous Waste Portion, Revision 8C, for the Treatment, Storage, and Disposal of Dangerous Waste, Part III, Operating Unit Group 11, Integrated Disposal Facility (IDF) Permit, WA 7890008967," 20-NWP-047, dated March 6, 2020.
 2. RL letter from B. T. Vance to A. K. Smith, Ecology, "Submittal of Hanford Facility Dangerous Waste Class 3 Permit Modification Request to Update the Operating Permit for the Integrated Disposal Facility (IDF) Operating Unit Group (OUG) 11" 20-AMRP-0007, dated December 6, 2019.

In December 2019, the U.S. Department of Energy, Richland Operations Office (RL) and CH2M HILL Plateau Remediation Company submitted a permit modification request, Reference 2., which included Appendix C7, "Leachate Monitoring Plan" and C8, "Sub-Surface Liquids Monitoring and Operations Plan."

These appendices were included as prescribed by the Integrated Disposal Facility (IDF) unit-specific permit conditions. Per Permit Condition III.11.F.1.a, a Leachate Monitoring Plan (LMP) shall be submitted to the Washington State Department of Ecology (Ecology) at least 120 days prior to initial waste placement in the IDF. The LMP is required to include sampling and analysis of the leachate pursuant to generator requirements (Washington Administrative Code 173-303-200) and to meet waste acceptance criteria. Permit Condition III.11.F.3.a requires a Sub-Surface Liquids Monitoring and Operations Plan (SLMOP) be submitted to Ecology at least 180 days prior to initial waste placement in the IDF.

In March 2020, Ecology required the Leachate Collection Tanks to be permitted as a Dangerous Waste Management Unit (DWMU) prior to initial receipt of waste at IDF, Reference 1. This would change management of leachate from generator accumulation to DWMU storage, and a new permit modification request will be submitted to address applicable requirements. Based on this change, the Permittees have decided to withdraw the LMP and SLMOP documents from the current permit modification request, Reference 2., in order to align these documents with the management of leachate under the Hanford Facility Resource Conservation and Recovery Act Permit.

The Permittees request to remove the LMP and SLMOP from permit modification C3-IDF-2019-01. The Permittees will re-submit these Attachments in the future permit modification to add the Leachate Collection Tanks as a DWMU.

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
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Brian T. Vance
Manager

ESQ:DBC

cc: D. B. Bartus, EPA
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S. N. Schleif, Ecology
N. W. Ware, Ecology
M. Woods, Oregon DOE
Administrative Record (TSD: D-2-11)
Ecology NWP Library
Environmental Portal, G3-35
HF Operating Record (J. K. Perry, HMIS)