



STATE OF WASHINGTON
 DEPARTMENT OF ECOLOGY
 PO Box 47600 • Olympia, WA 98504-7600 • 360-407-6000
 TTY 711 or 800-833-6388 (For the Speech or Hearing Impaired)

October 28, 2004

Mr. Roy J. Schepens, Manager
 Office of River Protection
 United States Department of Energy
 P.O. Box 450, MSIN: H6-60
 Richland, Washington 99352-0550

Mr. Edward Aromi, Jr., President & General Manger
 CH2M Hill Hanford Group, Inc.
 P.O. Box 1500, MSIN: H6-08
 Richland, Washington 99352-1505

Roy *ed*
 Dear Mr. Schepens and Mr. Aromi:

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EDMC

Re: Request for Temporary Authorization for Construction of Ancillary Structures at the
 Integrated Disposal Facility

The Washington State Department of Ecology (Ecology) has received and reviewed the United States Department of Energy-Office of River Protection's (USDOE-ORP) request for Temporary Authorization (TA) that was received October 8, 2004. This request is for a TA to allow the construction of ancillary structures at the Integrated Disposal Facility (IDF) site prior to issuance of an approved modification to the Hanford Sitewide Permit establishing permit approval for, and conditions related to, the IDF. This is the second TA request for IDF and it follows one that was granted by Ecology on September 7, 2004, to allow the rough excavation of IDF Cells 1 and 2 pursuant to construction drawing H-2-830829, IDF Cells 1 and 2 Subgrade Plan.

The September 7, 2004, TA was granted, in part, based on USDOE-ORP's assertion that the excavation was needed to facilitate timely implementation of closure and corrective action activities at the Hanford site. In conjunction with the September 7, 2004 TA, Ecology prepared and issued an accompanying State Environmental Policy Act (SEPA) Determination of Non-Significance (DNS) and Adoption of Existing Environmental Documents. Both the September 7, 2004, TA and its accompanying DNS focus solely on the excavation of IDF Cells 1 and 2. No authorization or approval was given or implied related to design of IDF; construction of IDF; critical systems to be installed at IDF; or whether, or what, waste may be disposed at IDF (either in form or quantity).



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As stated in the DNS supporting the September 7, 2004, TA: "Excavation of the IDF would not in any way limit future permitting decisions related to the waste forms to be disposed of at IDF, the design, construction, or operation of IDF, or any mitigation measures associated with these activities." Decisions related to these matters will be made in the future in the context of a decision on whether to modify the Hanford Sitewide Permit to establish permit conditions governing IDF. This permitting decision will be supported by future additional SEPA analysis.

Ecology finds that the requested actions in the second request for a TA do not meet the criteria for granting a TA under Washington Administrative Code 173-303-830(4)(e). Furthermore, Ecology believes that the construction activities for which USDOE-ORP has requested a second TA cannot occur without additional SEPA review, which in turn must occur in the context of USDOE-ORP's larger request for a permit modification regarding construction and operation of IDF. Based on these factors, Ecology denies USDOE-ORP's request for a second TA.

If you have any questions regarding this letter, please contact Suzanne Dahl at (509) 372-7892.

Sincerely,



Linda Hoffman
Director

cc: Phil Lamont, USDOE
James Rasmussen, USDOE
Moses Jarayssi, CHG
Greg Parson, CHG
Stuart Harris, CTUIR
Pat Sobotta, NPT
Russell Jim, YN
Todd Martin, HAB
Ken Niles, ODOE
Administrative Record: Integrated Disposal Facility/Dangerous Waste Permitting ✓
Environmental Portal