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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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July 21, 2016

16-NWP-118

Ms. Stacy Charboneau, Manager
Richland Operations Office
United States Department of Energy
PO Box 550, MSIN: A7-50
Richland, Washington 99352

Mr. John A. Ciucci, President and CEO
CH2M HILL Plateau Remediation Company
PO Box 1600, MSIN: H7-30
Richland, Washington 99352

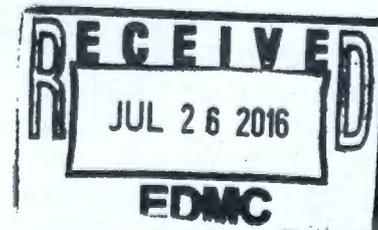
Re: Submittal of 324 Building Dangerous Waste Management Units Closure Plan, DOE/RL-96-73, Revision 4

Reference: Letter 16-ESQ-0093, dated June 30, 2016, from Stacy Charboneau, DOE-RL to Alexandra Smith, Ecology 1239063

Dear Ms. Charboneau and Mr. Ciucci:

This letter acknowledges the Department of Ecology's (Ecology) receipt of the U.S. Department of Energy – Richland Operations Office's (DOE-RL) request for a permit modification. This permit modification will incorporate the 324 Building Dangerous Waste Management Units, Closure Unit Group 11, into the *Hanford Facility Resource Conservation and Recovery Act Permit, Dangerous Waste Portion, Revision 8C, for the Treatment, Storage, and Disposal of Dangerous Waste, Part V, WA7890008967* (Site-wide Permit). The permit modification request was submitted as a Class 2 permit modification as specified in Hanford Federal Facility Agreement and Consent Order (HFFACO) M-089-06.¹ The submitted documents include the Closure Plan (DOE/RL096-73, Rev 4) and the "Part A" permit application for the 324 Building.

For modifications not listed in Washington Administrative Code (WAC) 173-303-830 Appendix I, the permittee may either (1) submit a Class 3 modification request to Ecology; or (2) request a determination by the director that the modification be reviewed and approved as a Class 1 or Class 2 modification in accordance with WAC 173-303-830(4)(d)(i).



¹ Ecology acknowledges that TPA milestone M-089-06 incorrectly specifies that DOE-RL was to submit the permit modification request to include the 324 Building closure plan into Rev. 8c of the Hanford Dangerous Waste permit as a Class 2 permit modification request.



Ms. Charboneau and Mr. Ciucci
July 21, 2016
Page 2

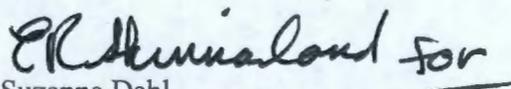
16-NWP-118

As noted in previous communications with DOE-RL, and consistent with current practice, Ecology has determined that a permit modification request to add a closure plan to the Hanford Site-wide Permit is a Class 3 permit modification in accordance with WAC 173-303-830(4)(d)(ii). As such, Ecology will process this modification in accordance with WAC 173-303-830(4)(c) and WAC 173-303-840. Therefore, following the current permittee-led 60-day comment period, Ecology will prepare a draft permit for the 324 Building Dangerous Waste Management Units, Closure Unit Group 11, and will hold its own 45-day public comment period on the draft permit (WAC 173-303-840(3)(d)).

In addition, DOE-RL needs to send out a supplemental notice to the public stating that the proposed permit modification to add 324 Building to the Site-wide permit as Closure Unit Group 11, will be processed as a Class 3 permit modification in accordance with WAC 173-303-830(4)(c) and (d).

If there are any questions, please contact Stephanie Schleif, Project Manager, at stephanie.schleif@ecy.wa.gov or (509) 372-7929 or Debra Alexander, Rev.8c Permit Coordinator, at debra.alexander@ecy.wa.gov or (509) 372-7896.

Sincerely,



Suzanne Dahl
Dangerous Waste Permit Manager
Nuclear Waste Program

cc electronic:

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Administrative Record
NWP Central File
NWP Reader File