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

DEC 23 1997

97-EAP-831

Mr. Moses N. Jaraysi
State of Washington
Department of Ecology
1315 West Fourth Avenue
Kennewick, Washington 99336-6018



Dear Mr. Jaraysi:

REQUEST FOR CLASS 1 MODIFICATION OF THE 183-H SOLAR EVAPORATION BASINS PORTION OF THE HANFORD FACILITY RESOURCE CONSERVATION AND RECOVERY ACT (RCRA) PERMIT

Attached is a Class 1 modification request, "Hanford Facility RCRA Permit Permit Modification Notification Form," for the 183-H Solar Evaporation Basins portion of the Permit. This Class 1 request requires State of Washington Department of Ecology approval for incorporation into the Permit. Specifically, the U.S. Department of Energy, Richland Operations Office (RL) and Bechtel Hanford, Inc. are requesting that a change in the schedule for groundwater monitoring at this unit be allowed.

Currently, the compliance groundwater monitoring plan, "Groundwater Monitoring Plan for the 183-H Solar Evaporation Basins, WHC-SD-EN-AP-180" which is referenced in Attachment 11 of the Permit, "183-H Solar Evaporation Basins Closure/Post-Closure Plan," requires that wells be sampled at least semiannually during the compliance period. Table 5 of the compliance monitoring plan states that semiannual sampling events will occur in two intervals, spring (March through June) and fall (September through December). It is requested that the fall sampling event be delayed from December 1997 to February 1998.

The need for this delay is to ensure compliance with the existing Permit while awaiting Modification C of the Permit to become effective (anticipated to occur by mid-January 1998). Modification C of the Permit includes a new groundwater monitoring program, "Corrective Action Groundwater Monitoring Plan for the 183-H Solar Evaporation Basins; PNNL-11573," under corrective action, Washington Administrative Code 173-303-645(11), and is referenced in Attachment 34 of Modification C of the Permit. This program is an improved groundwater monitoring program designed to integrate RCRA monitoring with Comprehensive Environmental Response, Compensation, and Liability Act interim remedial measures being taken due to chromium contamination in the 100-H Area of the Hanford Site. The new program will not require the fall sampling event.

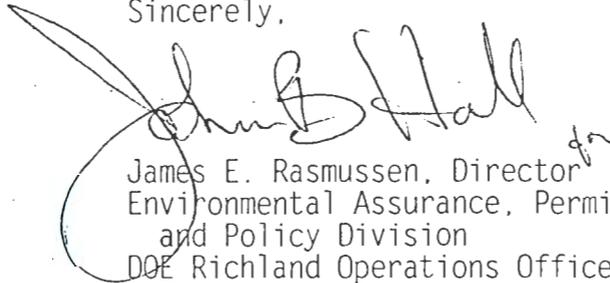
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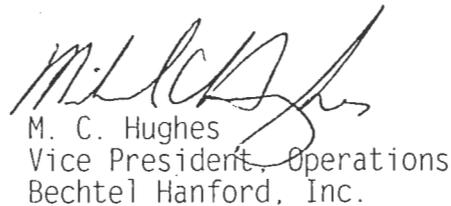
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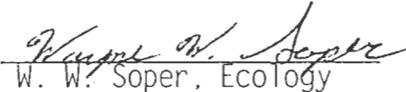
RL would appreciate a prompt response to this request. Should you have any questions regarding the document, please contact Ellen Mattlin, RL of my staff at 376-2385 or Tom Ferns of RL Restoration Projects Division on 372-0649.

Sincerely,


James E. Rasmussen, Director
Environmental Assurance, Permits,
and Policy Division
DOE Richland Operations Office

EAP:EMM


M. C. Hughes
Vice President, Operations
Bechtel Hanford, Inc.

Approval:  12-29-97
W. W. Soper, Ecology Date

Enclosure:
Class 1 Modification Request

cc w/encl:

Administrative Record H6-08

J. W. Badden, CHI
L. J. Cusack, Ecology
M. J. Hartman, PNNL
S. Leja, Ecology
M. A. Mihalic, BHI
S. M. Price, FDH
W. W. Soper, Ecology
J. G. Woolard, BHI

Hanford Facility RCRA Permit Modification Notification Form

Unit:
183-H Solar Evaporation Basins

Permit Part & Chapter:
Part III, Chapter 1

Description of Modification:

Delay in the schedule for the fall 1997 compliance groundwater monitoring sampling event from December 1997 to February 1998 in order to allow time for the Hanford Facility RCRA Permit Modification C to become effective. Modification C includes a revised postclosure permit application for the 183-H Solar Evaporation Basins which includes a groundwater monitoring program under corrective action. Once the modified Permit is effective, the corrective action groundwater monitoring program will replace the compliance monitoring program.

Modification Class: ¹ 2

please check one of the Classes:

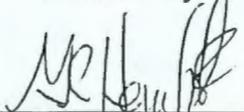
Class 1	Class 1	Class 2	Class 3
	X		

Relevant WAC 173-303-830, Appendix I Modification: C.2.

Enter wording of the modification from WAC 173-303-830, Appendix I citation:

Changes in ground water sampling or analysis procedures or monitoring schedule, with prior approval of the director

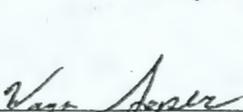
Submitted by Co-Operator:


G.C. Henckel
Date 12/17/97

Reviewed by RL Program Office:


T.W. Ferns
Date 11/26/97

Reviewed by Ecology:


W.W. Soper
Date 12-29-97

¹This is only an advanced notification of an intended Class ¹, 2, or 3 modification, this should be followed with a formal modification request, and consequently implement the required Public Involvement processes when required.

²If the proposed modification does not match any modification listed in WAC 173-303-830 Appendix I, then the proposed modification should automatically be given a Class 3 status. This status may be maintained by the Department of Ecology, or down graded to ¹, if appropriate.