



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, WA 98101

0051876

Reply To
Attn Of: WCM-127

Debra A. Isom
Lockheed Martin Services Inc.
2440 Stevens Center
Mail Stop H6-08
Richland, WA 99352



Re: Permit Modification Information for Administrative Records and Information
Repositories
100-NR-1 and 100-NR-2 Corrective Action
EPA/Ecology ID No. WA7 8900 8967

Dear Ms. Isom:

Please find enclosed nine (9) copies of materials concerning permit modifications to the EPA component of the Hanford Federal Facility Resource Conservation and Recovery Act (RCRA) Permit for distribution to administrative records and information repositories. These materials incorporate the selected RCRA corrective action remedy for the 100-NR-1 and 100-NR-2 operable units into the permit. The materials enclosed include the administrative record index, supporting administrative record materials, and a new copy of the EPA portion of the permit. This new permit copy has the added permit conditions in shaded text.

Should you have any questions or comments, please feel free to contact me at (206) 553-2804 or at bartus.dave@epa.gov.

Sincerely,

Dave Bartus, Senior Policy Analyst
Office of Waste and Chemicals Management

Enclosures (9)

cc: Jack Boller, WOO (w/o enclosures)
Nina Kocourek, EPA (w/o enclosures)
Laura Rudd, Ecology (w/o permit)

Administrative Record Index
EPA Region 10
100-NR-1 and 100-NR-2 Corrective Action
Hanford Federal Facility
WA7 89000 8967

- 1) Class 1 permit modification request, James E. Rasmussen, Energy to Michael Bussell, EPA, September 17, 1999.
- 2) "Hanford Update," December 1998.
- 3) Memorandum, "Hanford 100-NR-1 and 100-NR-2 Corrective Action Permit Modification," Dave Bartus to File, October 15, 1999.



Department of Energy
 Richland Operations Office
 P.O. Box 550
 Richland, Washington 99352
SEP 17 1998

*WAF 8967
 (M.B. hasn't seen)*

*WA896-
 9-17-98
 3a*

98-EAP-514

Mr. Michael A. Bussell, Director
 Office of Waste and Chemical Management
 U.S. Environmental Protection Agency
 Region 10
 1200 Sixth Avenue
 Seattle, Washington 98101

Dear Mr. Bussell:

PERMIT MODIFICATIONS TO THE HANFORD FEDERAL FACILITY RESOURCE CONSERVATION AND RECOVERY ACT (RCRA) PERMIT, HAZARDOUS AND SOLID WASTE AMENDMENTS (HSWA) PORTION FOR THE 100-NR-1 AND 100-NR-2 OPERABLE UNITS

Pursuant to permit condition III.A.2.A of the HSWA component of the Hanford Federal Facility RCRA Permit, the U.S. Department of Energy (DOE) is modifying this permit to incorporate the final remedy and schedule of compliance for the 100-NR-1 and 100-NR-2 Operable Units. Each of these units contains RCRA Past Practice units, subject to RCRA Corrective Actions for releases from solid waste management units. DOE is hereby providing notification of a Class I Permit modification pursuant to 40 Code of Federal Regulations 270.42.

The proposed permits language is: "III.B.3 The following RCRA Past Practice (RPP) units require further investigation and/or corrective as described in Attachment G of this Permit". This proposed change along with Attachment G are enclosed.

If you have any questions, please contact Ellen M. Mattlin, of my staff, on (509) 376-2385.

Sincerely,

James E Rasmussen

James E. Rasmussen, Director
 Environmental Assurance, Permits,
 and Policy Division

RECEIVED

SEP 24 1998

OFFICE OF WASTE & CHEM. MGMT.

EAP:EMM

Enclosure

cc w/encl:
 J. R. Wilkinson, CTUIR
 L. J. Cusack, Ecology
 P. R. Staats, Ecology
 D. B. Bartus, EPA

D. R. Sherwood, EPA
 Donna L. Powaukee, NPT
 Russell Jim, YIN

RECEIVED

SEP 22 1998

OFFICE OF WASTE & CHEM. MGMT.

Proposed changes to EPA's HSWA Permit

III.B.1.b **The following RCRA Past Practice (RPP) units on the Hanford Site require further investigation as described in Attachment G of this Permit.**

III.B.1.b.(i) **100-NR-1 Operable Unit, (Attachment G, Chapter 1)**

III.B.1.b.(ii) **100-NR-2 Operable Unit, (Attachment G, Chapter 2)**

.III.B.1.b.(xxiii) Other Solid Waste Management Units

Attachment G
CHAPTER 1

100-NR-1 Operable Unit

The 100-NR-1 Operable Unit (OU) includes solid waste management units and one time spill sites which are undergoing corrective action. As prescribed by condition III.B.1.b.(i) of this permit, this Chapter sets forth the corrective action requirements for the 100-NR-1 OU.

G.1.A COMPLIANCE WITH APPROVED CORRECTIVE MEASURES STUDY

The Permittees shall comply with all sections set forth in the Corrective Measures Study (CMS) for the 100-NR-1 Operable Units, DOE/RL-95-111, Rev. 0. Enforceable portions of the CMS are listed below; all subsections, figures, and tables included in these portions are also enforceable unless stated otherwise;

- Section 7.0 Comparative Analysis of Remedial Alternatives
- Section 9.0 Recommended Corrective Measures
- Section 9.1 RCRA Corrective Action Performance Standards
- Section 9.2 Corrective Measure for NR-1
 - Section 9.2.1 Recommended Action and Justification
 - Section 9.2.2 Cleanup Standards
 - Section 9.2.3 Cost
 - Section 9.2.4 Schedule
 - Section 9.2.5 Personnel Training
- Appendix A Applicable or Relevant and Appropriate Requirements
- Appendix B Cost Estimates
- Appendix C Integration of Decommissioning and Remedial Activities for the 100-N Area

Attachment G
CHAPTER 2

100-NR-2 Operable Unit

The 100-NR-2 Operable Unit (OU) is the groundwater below 100-NR-1 OU which has been contaminated as a result of past intentional disposal operations and unintentional spills of hazardous substances. As prescribed by condition III.B.1.b.(ii) of this permit, this Chapter sets forth the corrective action requirements for the 100-NR-2 OU.

G.2.A COMPLIANCE WITH APPROVED CORRECTIVE MEASURES STUDY

The Permittees shall comply with all sections set forth in the Corrective Measures Study (CMS) for the 100-NR-2 Operable Units, DOE/RL-95-111, Rev. 0. Enforceable portions of the CMS are listed below; all subsections, figures, and tables included in these portions are also enforceable unless stated otherwise;

Section 7.0	Comparative Analysis of Remedial Alternatives
Section 9.0	Recommended Corrective Measures
Section 9.1	RCRA Corrective Action Performance Standards
Section 9.3	Corrective Measure for NR-2
Section 9.3.1	Recommended Action and Justification
Section 9.3.2	Cleanup Standards
Section 9.3.3	Cost
Section 9.3.4	Schedule
Section 9.3.5	Personnel Training
Appendix A	Applicable or Relevant and Appropriate Requirements
Appendix B	Cost Estimates
Appendix C	Integration of Decommissioning and Remedial Activities for the 100-N Area



HANFORD UPDATE

Tri-Party Agreement

A bulletin on Hanford cleanup and compliance

December 1998

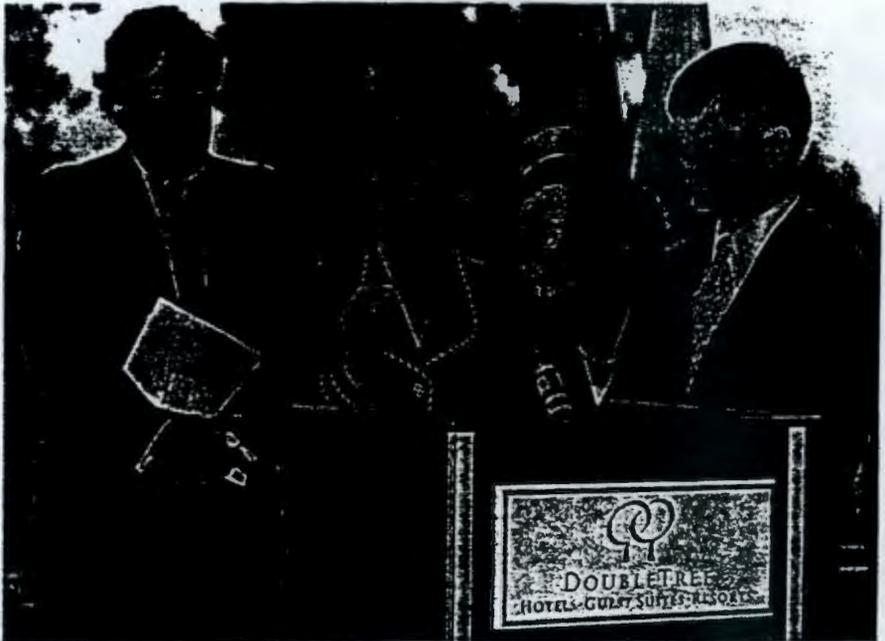
Department of Energy and Washington Ecology Reach 'Breakthrough' Agreement

In a press conference along the banks of the Columbia River October 14, U.S. Secretary of Energy Bill Richardson, Washington Governor Gary Locke and Attorney General Christine Gregoire announced an agreement in principle to resolve the State's intent to sue over missed milestones for pumping Hanford's single-shell waste tanks. Two missed Tri-Party Agreement milestones for pumping waste out of the underground storage tanks prompted the state to threaten legal action last June.

In February, Locke and Gregoire said the state needed to see progress in three areas: the removal of spent fuel from the K Basins; the treatment of high-level radioactive waste in the underground storage tanks; and the pumping of high-level waste liquids from the remaining 29 single-shell tanks. The third and last issue was resolved with the October 14th agreement.

"Secretary Richardson has shown tremendous leadership by making these commitments to clean up Hanford," said Gov. Locke. "We now have a consent decree outlining cleanup timetables and, for the first time, cleanup priorities will be determined by the level of risk."

"We are pleased to reach an agreement that will continue our efforts to clean up Hanford with a realistic schedule, accommodating safety and



Energy Secretary Bill Richardson (far left), State Attorney General Christine Gregoire, Washington Senator Patty Murray, and Governor Gary Locke announce an agreement on Hanford tank pumping.

technical issues that may arise," Richardson said.

The agreement recognizes that such unanticipated technical or safety issues may constitute good cause for amending the milestone schedule. A tank cleanup schedule will be completed by Mid-December, 1998.

"Hanford poses one of the largest and most important challenges we face in coming to terms with the environmental legacy of the nuclear arms race," Richardson said. "We will work aggressively to meet the challenge to protect the people, the wildlife and ultimately the largest freshwater artery of the Pacific Northwest the Columbia River."

Hanford Board Seeks At-Large Member

Hanford cleanup agencies are seeking a public at-large member to join the 30-seat Hanford Advisory Board. The primary mission of the Board is to provide informed recommendations and advice to the Department of Energy, the Environmental Protection Agency, and the Washington Department of Ecology on major policy issues related to the cleanup of the Hanford Site. The goal of the Board is to develop consensus policy recommendations and advice.

Most Board members are selected from recognized legal entities and organizations, including local governments, Indian Tribes, labor unions, and economic development, public health, and environmental groups. There are four "public-at-large" seats, filled by people who have expressed a general interest in Hanford cleanup issues and who might otherwise contribute to ethnic, geographic, racial, or gender diversity of the Board. Under the Board's charter, these at-large seats should be used to bring additional leadership skills and technical, economic, and agricultural expertise to the board.

Board members will be expected to spend a significant amount of time and effort on Board activities. The board is scheduled to meet for two full days 8 times each year. In addition, the Board's three standing committees meet approximately once each month for a half-to-full day. The majority of meetings will be held in the Tri-Cities area; the balance will be held in other parts of Washington and Oregon. Review of written materials, conference calls, orientation sessions and tours may add to this time and travel commitment.

Telephone, travel, meal and lodging expenses will be reimbursed by USDOE. Lost work time and other expenses, however, cannot be covered.

Nomination/Application forms can be obtained by calling the Hanford Cleanup Toll-Free number: 1-800-321-2008. Applications must be received no later than 5 p.m. Monday, February 1, 1999. Ecology and EPA will review nominations and applications, and will then recommend one person to the Department of Energy for appointment.

Contact: Max Power (360) 407-7118

Department of Energy to Modify RCRA Permit

The Department of Energy, Richland Operations Office (RL) is modifying the Hanford Federal Facility Resource Conservation and Recovery Act (RCRA) Permit, Hazardous and Solid Waste Amendments (HSWA) Portion. The Permit is being modified to incorporate the final remedy and schedule of compliance for the 100-NR-1 and 100-NR-2 Operable Units. Each of these

units contains RCRA Past Practice units, subject to RCRA Corrective Actions for releases from the solid waste management units. RL is hereby providing notification of a Class 1 Permit modification pursuant to 40CFR 270.42.

Contact: Ellen Mattlin, Department of Energy, at (509) 376-2385



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 10

1200 Sixth Avenue
Seattle, WA 98101

OCT 15 1999

Reply To
Attn Of: WCM-127

MEMORANDUM

SUBJECT: Hanford 100-NR-1 and 100-NR-2 Corrective Action Permit Modification
EPA/Ecology ID No. WA7 8900 8967

FROM: Dave Bartus, Senior Policy Analyst *DBB*
Office of Waste and Chemicals

TO: File

On September 17, 1998, the U.S. Department of Energy requested a Class 1 permit modification to the Environmental Protection Agency (EPA) portion of the Hanford Federal Facility Resource Conservation and Recovery Act (RCRA) permit, pursuant to 40 Code of Federal Register (CFR) 270.42. Pursuant to 40 CFR 270.42(a)(ii), the Permittee provided notice to the facility mailing list in the December, 1998 edition of the "Hanford Update." (Note: An opportunity for public notice and comment on substantive elements associated with this modification were provided as part of the 100-NR-1 and 100-NR-2 Operable Unit Proposed Plan, from March 16 to April 29, 1998). EPA Region 10 received no comments or other response from this Class 1 modification notification, and therefore considers the requested modification effective.