



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

19-AMRP-0021

**NOV 01 2018**

Ms. Alexandra K. Smith, Program Manager  
Nuclear Waste Program  
Washington State Department of Ecology  
3100 Port of Benton Boulevard  
Richland, Washington 99354

Dear Ms. Smith:

**SUBMITTAL OF HANFORD FACILITY DANGEROUS WASTE CLASS 3 PERMIT  
MODIFICATION REQUEST FOR SOLID WASTE OPERATIONS COMPLEX (SWOC)  
DANGEROUS WASTE MANAGEMENT UNITS CLOSURE PLANS PART TWO**

- References:
- (1) Ecology ltr. to J. R. Franco, RL, from S. L. Dahl, "Re: Dangerous Waste Management Unit (DWMU) 277-T Building Closure Plan Comment Disposition and Performance Standards for Future Solid Waste Operations Complex (SWOC) Closure Plans," 17-NWP-100, dtd. August 14, 2017.
  - (2) RL ltr. to J. A. Hedges, Ecology, from M. S. McCormick, "Submittal of Additional Closure Plans for the Closing Dangerous Waste Management Units (DWMUs) at the T-Plant Complex," 14-ESQ-0003 dtd. October 18, 2013.
  - (3) RL ltr. to J. A. Hedges, Ecology, "Response to Consent Agreement and Final Order (CAFO) Concerning the Submittal of Closure Plans for Closing Dangerous Waste Management Units (DWMUs)," 13-ESQ-0074, dtd. October 11, 2013.

A Class 3 Permit Modification Request for the SWOC Closure Plans to satisfy the Consent Agreement and Final Order was submitted in October 2013, References (2) and (3). This letter transmits the Review Comment Record and revised closure plans in support of the Washington State Department of Ecology held 45-day public comment period and development of the draft permit. The revised closure plans include:

- 221-T Sand Filter Pad Dangerous Waste Management Unit Closure Plan
- 221-T R5 Waste Storage Area Dangerous Waste Management Unit Closure Plan
- 277-T Outdoor Storage Area Dangerous Waste Management Unit Closure Plan
- 221-T Railroad Cut Dangerous Waste Management Unit Closure Plan

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The permittees have worked closely with your staff on these revisions. Changes include sampling and extraction methods regarding clean debris surface, language for the exclusion of an exposure pathway, and Data Quality Objective language to reflect the U.S. Environmental Protection Agency process, Reference (1).

This transmittal includes the following attachments:

- Attachment 1: Certification for Submittal of Class 3 Permit Modification Request for SWOC Dangerous Waste Management Units Closure Plans Part Two
- Attachment 2: Addendum H – Consolidated Closure Plan for the Solid Waste Operations Complex Closure Units Part Two
- Attachment 3: 277-T Outdoor Storage Area Closure Plan Review Comment Record Response

If you have any questions, please contact me or your staff may contact Bill Hamel, Assistant Manager for the River and Plateau, on (509) 373-9971.

Sincerely,

  
Doug S. Shoop  
Manager

AMRP:DBC

Attachments (3)

cc w/attachs:

L. J. Cusack, CHPRC  
S. L. Dahl-Crumpler, Ecology  
M. N. Jaraysi, CHPRC  
S. K. Johansen, CHPRC  
K. A. Elsethagen, Ecology  
Administrative Record (TS-2-7)  
Ecology NWP Library  
Environmental Portal  
HF Operating Record (J. K. Perry, MSA)

cc w/o attachs:

D. B. Bartus, EPA  
J. Bell, NPT  
R. Buck, Wanapum  
D. R. Einan, EPA  
M. Johnson, CTUIR  
R. Longoria, YN  
K. Niles, ODOE  
D. Rowland, YN