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

06-AMRC-0110

**FEB 08 2006**



Ms. Jane A. Hedges, Program Manager  
Nuclear Waste Program  
State of Washington  
Department of Ecology  
3100 Port of Benton Boulevard  
Richland, Washington 99354

Dear Ms. Hedges:

**REQUEST FOR TEMPORARY AUTHORIZATION TO OPERATE 331-C STORAGE UNIT**

On December 15, 2005, the U.S. Department of Energy, Richland Operations Office (RL) and Pacific Northwest National Laboratory (PNNL) submitted a certified Class 3 permit modification request to Ecology for the 331-C Storage Unit (331-C). Ecology consideration of this permit modification is currently underway.

In order to vacate the 305-B facility as soon as practicable, RL and PNNL plan to relocate PNNL's permitted hazardous waste storage operations to 331-C after facility modifications to 331-C are complete and all necessary approvals are secured. This is estimated to be March 2006.

In order to allow operations to be relocated while the permit modification is being processed a 180-day temporary authorization to operate under the current Hanford Resource Conservation and Recovery Act (RCRA) Permit is needed from Ecology. This letter contains the elements of a temporary authorization request, as given in WAC 173-303-830(4)(e)(ii)(B).

Description of activities to be conducted under the temporary authorization: Storage of hazardous waste, as described in the 331-C permit application submitted on December 15, 2005.

Explanation of the necessity of the temporary authorization: RL and PNNL intend to vacate the 305-B facility as soon as possible in support of the expedited 300 Area removal actions as described in U.S. Environmental Protection Agency (EPA) Action Memorandum #1 for the 300 Area Facilities. In order to relocate 305-B operations to 331-C in advance of Ecology's final permit decision, a temporary authorization is needed.

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Information to ensure compliance with WAC standards: The hazardous waste management operations in 331-C will comply with the operational requirements of the Hanford RCRA Permit, WAC 173-303, and the 331-C permit application. These operational requirements are generally identical to those currently in effect at 305-B.

PNNL and RL will provide timely notice to the parties specified in WAC 173-303-830(4)(e)(ii)(C), as required. The notification requirement is met through publication in the Hanford Update, as described in Permit condition I.C.3:

“For notifications required by the Permittees to persons on the facility mailing list described in WAC 173-303-830(4)(a)(i)(B), -830(4)(b)(ii), -830(4)(c)(ii), and -830(4)(e)(ii)(C), use of appropriate HFFACO Community Relations Plan publications and/or list servers for public involvement satisfy the notification requirements.”

The temporary authorization request appears to meet the criteria for approval given in WAC 173-303-830(4)(e)(iii)(B)(I), i.e. the authorization is necessary before Ecology action is likely to be taken on a modification request in order to facilitate timely implementation of closure activities.

If you have questions or need further information concerning this request, please contact me or your staff may contact Kevin Bazzell, of my staff, on (509) 373-0463.

Sincerely,



David T. Evans, Acting Assistant Manager  
for the River Corridor

AMRC:RFG

cc: T. L. Aldridge, PNSO  
G. Bohnee, NPT  
F. W. Bond, Ecology  
G. P. Davis, Ecology  
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Administrative Record (331-C Storage Unit)  
Environmental Portal, A3-01