



U.S. Department of Energy

**Office of River Protection**

0062552

P.O. Box 450  
Richland, Washington 99352

AUG 12 2004

04-TPD-081

Mr. Michael A. Wilson, Program Manager  
Nuclear Waste Program  
State of Washington  
Department of Ecology  
3100 Port of Benton Blvd.  
Richland, WA 99352

RECEIVED  
AUG 24 2004

EDMC

Dear Mr. Wilson:

**MODIFICATION OF THE HANFORD SITEWIDE PERMIT TO PROVIDE TEMPORARY AUTHORIZATION FOR SOIL EXCAVATION OF THE INTEGRATED DISPOSAL FACILITY (IDF)**

The Dangerous Waste Portion of the *Hanford Facility Resource Conservation and Recovery Act (RCRA) Permit for the Treatment, Storage, and Disposal (TSD) of Dangerous Waste* (Permit), WA7890008967, is in the process of being modified to include the IDF as a new unit. The U.S. Department of Energy (DOE), Office of River Protection (ORP) submitted a certified RCRA Part B Permit application for this facility to the State of Washington Department of Ecology (Ecology) on June 23, 2003, and submitted a modification to this application on June 3, 2004. A schedule for permitting activities is included in the *Part B Permitting Plan for the Integrated Disposal Facility* (RPP-18416, Rev. 1) signed by Ecology, ORP, and CH2M HILL Hanford Group, Inc. representatives on April 7, 2004. As part of this permitting plan, the parties agreed that "rough excavation of the trench can occur prior to receipt of a final status permit," as well as contractor mobilization, IDF site stripping, clearing and grubbing, water and power hookups, and road construction activities.

As we discussed in our August 6, 2004, meeting, we have prepared the attached request for a temporary authorization in accordance with Washington Administrative Code (WAC) 173-303-830(3)(e) for rough excavation to proceed at the IDF. Approval of the temporary authorization is critical to meeting contractual commitments that have already been placed for this activity and are consistent with the permitting plan.

WAC 173-303-830(3)(e)(ii)(C) requires that DOE "send a notice about the temporary authorization request to all persons on the facility mailing list maintained by the director and to appropriate units of state and local governments as specified in WAC 173-303-840 (3)(e)(i)(D)." This section also requires that the notification be made within seven days of submission of the authorization request. ORP will submit notice of this temporary authorization in accordance with this requirement seven days from the date of this letter.

Mr. Michael A. Wilson  
04-TPD-081

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If you have any questions, please contact me, or your staff may contact John H. Swailes, Assistant Manager, Tank Farms Project, (509) 376-0933.

Sincerely,

  
Roy J. Schepens  
Manager

TPD: PEL

Attachment

cc w/attach:

M. N. Jarayssi, CH2M HILL

S. Harris, CTUIR

L. J. Cusack, Ecology

J. J. Lyon, Ecology

N. Ceto, EPA

T. Martin, HAB

P. Sobotta, NPT

K. Niles, Oregon Energy

J. B. Hebdon, RL

R. Jim, YN

Administrative Record

CH2M Correspondence Control

Environmental Portal, LMSI

REQUEST FOR A TEMPORARY AUTHORIZATION TO PROCEED WITH ROUGH  
EXCAVATION OF THE INTEGRATED DISPOSAL FACILITY (IDF)

The specific information necessary for the State of Washington Department of Ecology (Ecology) to determine whether a temporary authorization in accordance with Washington Administrative Code (WAC) 173-303-830(3)(e)(ii)(A)(I) may be granted is as follows:

1. A description of the activities to be conducted under the temporary authorization

Site preparation and rough excavation of the IDF trench to the extent that readiness is achieved for future placement of liner and leachate collection systems.

2. An explanation of why the temporary authorization is necessary

The temporary authorization is being requested pursuant to the criterion contained in WAC 173-303-830(3)(e)(iii)(B)(I) which states that a temporary authorization may be requested if it is necessary to achieve the objective of facilitating timely implementation of closure or corrective action activities. Approval of a temporary authorization will enable the U.S. Department of Energy, Office of River Protection to maintain its schedule for cleanup and closure of the Hanford Tank Farms as required by the *Hanford Federal Facility Agreement and Consent Order*. This schedule is dependent on having a disposal pathway that is permitted to receive mixed low-level waste that will result from cleanup and closure activities. Activities under the temporary authorization will be limited to only site preparation and rough excavation of the trench, and no work will begin on the Resource Conservation and Recovery Act (RCRA) critical systems until the Part B permit application is approved.

3. Sufficient information to ensure compliance with the standards in WAC 173-303-280 through 173-303-395 and 173-303-600 through 173-303-680

The requirements of WAC 173-303-280 through 173-303-395 do not apply to the activity of rough excavation of the IDF trench. Rough excavation activities will meet the requirements for follow-on installation of landfill design features (i.e., liner and leachate collection systems) as defined in the certified RCRA Part B Permit application for the IDF submitted to Ecology. These features are to be designed in compliance with WAC 173-303-665 requirements. Trench excavation dimensions are provided in Revision 1 of the IDF Part B Permit Application, Appendix 4A, Drawing H-2-830829, Sheet 1.