



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

15-AMRP-0070

JAN 28 2015

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

Dear Ms. Hedges:

PETITION FOR SITE-SPECIFIC VARIANCE FROM LAND DISPOSAL TREATMENT STANDARDS

This letter is in reference to RL letter to J. A. Hedges, Ecology, from D. S. Shoop, RL and J. A. Ciucci, CHPRC, "Submittal of Updated Part A Form Closure Plan for Waste Encapsulation and Storage Facility (WESF) Closing Dangerous Waste Management Unit," 15-AMRP-0028, dated December 2, 2014.

In accordance with 40 CFR 268.44(h)(2), "Land Disposal Restrictions," "Variance from a Treatment Standard," the U.S. Department of Energy Richland Operations Office (RL) and CH2M HILL Plateau Remediation Company (CHPRC) are submitting this Petition for a site-specific variance from the Land Disposal Restriction (LDR) concentration-based treatment standards. The LDR treatment standards are contained in 40 CFR 268.40, "Land Disposal Restrictions," "Applicability of Treatment Standards," and incorporated by reference in WAC-173-303-140, "Dangerous Waste Regulations," "Land Disposal Restrictions." This Petition applies to six waste items in two of the WESF hot cells. These waste items resulted from the cleanup of the WESF after encapsulation operations were completed in 1985.

The WESF Closure Plan was submitted as a Class 3 permit modification request on December 2, 2014, (Reference). This closure plan identifies that the hot cells will be clean closed by removal (page H-32) at a future date in coordination with the entire WESF Facility. To support a needed ventilation system replacement and future removal of the hot cells, Hot Cells A through F will be grouted.

The attached Petition is being submitted to ensure the action to grout wastes in place does not create future waste that does not satisfy LDR treatment standards since after grouting cannot be practically treated. This Petition describes why it is technically and environmentally inappropriate to treat the referenced waste items to a concentration based LDR treatment standard. In accordance with 40 CFR 268.44(m), an alternative treatment is proposed that is sufficient to minimize threats to human health and the environment posed by land disposal of the waste.

JAN 28 2015

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

Sincerely,



Stacy Charboneau
Manager

AMRP:JAR

Attachment

cc w/attach:

L. T. Blackford, CHPRC
A. E. Cawrse, CHPRC
L. J. Cusack, CHPRC
S. L. Dahl-Crumpler, Ecology
D. L. Flyckt, CHPRC
M. N. Jaraysi, CHPRC
J. R. Seaver, CHPRC
R. R. Skinnarland, Ecology
Ecology NWP Library
Environmental Portal
Administrative Record
HF Operating Record (J. K. Perry, MSA, A3-01)