

## LERF/ETF Temporary Authorization Request

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The U.S. Department of Energy Richland Operations Office (RL) and CH2M HILL Plateau Remediation Company (CHPRC) are requesting that the State of Washington Department of Ecology (Ecology) grant a temporary authorization to approve the requested Class 2 modification to the Liquid Effluent Retention Facility and 200 Area Effluent Treatment Facility (LERF/ETF) Hanford Facility Resource Conservation and Recovery Act Permit, Dangerous Waste Portion (Permit),

These changes have been discussed with the Ecology, and receipt of waste from the 242-A Evaporator is a high priority for the RL and the U.S. Department of Energy Office of River Protection. Due to pressing need to correct the deficiency in the Basin 42 Liner to avoid disruption of waste receipt from the 242-A Evaporator, a temporary authorization is requested pursuant to the Washington Administrative Code (WAC) 173-303-830(4)(e) on this submitted permit modification.

This attachment reiterates the temporary authorization requirements outlined in the WAC **in bold** and provides the required information. To support planned waste receipts from the 242-A Evaporator at LERF/ETF, temporary authorization is requested by August 31, 2014.

### **WAC 173-303-830(4)(e) Temporary authorizations.**

**(i) Upon request of the permittee, the director may, without prior public notice and comment, grant the permittee a temporary authorization in accordance with this subsection. Temporary authorizations must have a term of not more than one hundred eighty days.**

RL and CHPRC are requesting a temporary authorization for a full term of 180 days. The temporary authorization is needed to support repairs to the Basin 42 liner near the top of the basin and above the current liquid level in Basin 42. Repairs are needed prior to the 60 day public comment period due to concerns over the proper weather to perform the activities, as well as maintaining capacity to receive waste from site generators. In order to empty the basin, the contents would either need to be processed at ETF or transferred to another basin. Processing of effluent at ETF is not currently available due to upcoming repairs. Transferring the current Basin 42 contents to another Basin would also be problematic at this time. Basin 42 is stored and processed at pH range of 4-5 while Basin 43 and Basin 44 are stored and processed at a pH range of 10-11, due to their different chemical makeup of the waste water. Transferring the Basin 42 effluent to Basin 43 and Basin 44 will change the pH of all of the effluent and will result in treatment issues at ETF including release of ammonia gas and plugging of the drying vessels due to the chemistry change of the waste water. Finally, if the Basin 42 were required to be empty prior to the repair, waste receipts would be halted from the 242-A Evaporator, which would affect their operational abilities. Currently, the 242-A Evaporator processes tank retrieval waste and allow for additional room in double-shell tanks to become available.

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**(ii)(A) The permittee may request a temporary authorization for:**

**(1) Any Class 2 modification meeting the criteria in (e)(iii)(B) of this subsection**

The Permittees (RL and CHPRC) are requesting a temporary authorization request that meets the criteria of WAC 173-303-830(e)(iii)(B)(IV) to prevent disruption of ongoing waste management activities. A temporary authorization to implement this change will allow a timely correction to the Basin 42 liner and will not require the Permittees to empty the entire basin to do the repair, which is near the top of the basin and above the current liquid level in the Basin 42.

**(B) The temporary authorization request must include:**

**(I) A description of the activities to be conducted under the temporary authorization:**

The modification request proposes to revise one addenda of the LERF/ETF Hanford Facility RCRA Permit, the Process Information (Addendum C) by updating the method of repairs to the liners are LERF/ETF Basin 42. This update will facilitate the liner vendor to do the repairs while the basin still contains waste, preventing an unnecessary emptying of the basin and disruption of waste receipts from the 242-A evaporator.

**(C) The permittee must 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 notification must be made within seven days of submission of the authorization request.**

Permit Condition I.C.3 allows for the Tri-Party Agreement processes to be used at the Hanford Facility for temporary authorization notifications. The notice for the Class 2 modification and the temporary authorization will be made within 7 days after transmitting the request to Ecology.