

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

**BEFORE THE POLLUTION CONTROL HEARINGS BOARD  
IN AND FOR THE STATE OF WASHINGTON**

UNITED STATES DEPARTMENT OF  
ENERGY, AND CENTRAL PLATEAU  
CLEANUP COMPANY, LLC,

Appellants,

v.

STATE OF WASHINGTON,  
DEPARTMENT OF ECOLOGY,

Respondent.

PCHB No. 22-\_\_

**NOTICE OF APPEAL**

Pursuant to Chapter 43.21B RCW, Chapter 34.05 RCW, and Chapter 371-08 WAC, the United States Department of Energy (DOE), and the Central Plateau Cleanup Company, LLC (CPCCo), by and through their attorneys James A. Tupper, Jr., and Tupper Mack Wells PLLC, Grace King (DOE) and Monica Sheets (DOE), and Christopher Page (CPCCo), hereby appeal the Department of Ecology modification of Resource Conservation and Recovery Act (RCRA) Permit WA789008967 issued on December 6, 2021.

**I. Appealing Parties**

1.1 Appealing Parties:

Owner and Operator  
U.S. Department of Energy  
Hanford Site  
P.O. Box 550  
Richland, WA 99352  
(509) 376-7395

NOTICE OF APPEAL



**Tupper Mack Wells PLLC**  
2025 First Avenue, Suite 1100  
Seattle, Washington 98121  
TEL 206.493.2300 FAX 206.493.2310



1  
2 Co-Operator

3 Central Plateau Cleanup Company, LLC  
4 Scott Sax, President and Program Manager  
5 P.O. Box 1464  
6 Richland, WA 99352  
7 (509) 372-3845

8 1.2 Representation:

9 James A. Tupper, Jr.  
10 Douglas S. Morrison  
11 Tupper Mack Wells PLLC  
12 2025 First Avenue, Suite 1100  
13 Seattle, WA 98121  
14 Tupper@tmw-law.com  
15 Morrison@tmw-law.com  
16 (206) 493-2300

17 Grace J. King  
18 WSBA 49887  
19 Attorney for Appellant, U.S. DOE  
20 Grace.king@rl.doe.gov  
21 (509) 316-8436

22 Monica D. Sheets  
23 CO Bar #21820  
24 Attorney for Appellant, U.S. DOE  
25 Monica.Sheets@rl.doe.gov  
26 (509) 376-3500

Christopher B. Page  
General Counsel  
Central Plateau Cleanup Company, LLC  
P.O. Box 1464  
Richland, WA 99352  
Christopher\_b\_page@rl.gov  
(509) 376-6613

II. Identification of Parties

2.1 United States Department of Energy, Hanford and the Central Plateau Cleanup Company, LLC, Appellants.

2.2 State of Washington, Department of Ecology, Respondent.



1 **III. Decisions Under Appeal**

2 Ecology issued Modification No. 8C.2021.1F to RCRA Permit No. WA789008967  
3 (“Modification”) on December 6, 2021, with an effective date of January 6, 2022. Attached as  
4 Exhibit A. The conditions and addenda for the Modification are available online at: Hanford  
5 Dangerous Waste Permit Modification | Washington State Department of Ecology

6 **IV. Grounds for Appeal**

7 4.1 The closure requirements imposed by Ecology in its Permit Modification to Part  
8 V of the Hanford Facility Resource Conservation and Recovery Act Permit, Dangerous Waste  
9 Portion, Revision 8C, for the Treatment, Storage, and Disposal of Dangerous Waste,  
10 WA7890008967, to add Closure Unit Group 27, 277-T Building; Closure Unit Group 28, 277-T  
11 Outdoor Storage Area; Closure Unit Group 29, 271-T Cage; Closure Unit Group 30, 211-T Pad;  
12 and Closure Unit Group 39, 2401-W Waste Storage Building establish unreasonable closure  
13 standards and sampling requirements.

14 4.2 The Appellants originally submitted closure plans for the units included in the  
15 Modification in 2013 in accordance with the Consent Agreement and Final Order issued by the  
16 U.S. EPA. Since 2013 considerable state and federal resources were expended to develop and  
17 document closure strategies for these units. In October 2017 the Appellants and Ecology reached  
18 agreement on closure performance standard values and exposure pathways for soil sampling.  
19 Ecology provided formal acceptance of the Appellants’ proposed closure strategy for treating  
20 concrete surfaces to a clean debris surface, using the 277-T Building unit as an example (17-  
21 NWP-150). Ecology had also provided concurrence with the sufficiency of the Appellants’  
22 review of facility operating records. On June 19, 2018, Ecology confirmed that the closure  
23 strategy for the units was approved and that the closure plans could move forward with formal  
24 transmittal.

25 4.3 The Appellants submitted revised closure plans to Ecology for the units covered  
26 in the Modification in August and November 2018. In December 2018, after the Appellants had



1 formally transmitted the revised closure plans with the understanding that agreement on all  
2 closure performance standard issues had been achieved, Ecology verbally informed the  
3 Appellants that it no longer agreed with the closure strategies for these units. In place of previous  
4 agreements, Ecology stated that waste management records were insufficient and proposed new  
5 closure strategies. Ecology requested that the Appellants revise and resubmit the closure plans to  
6 reflect Ecology's new position on closure standards. The Appellants informed Ecology that they  
7 would not be making the closure plan revisions to incorporate Ecology's additional sampling  
8 strategies, as there was no reasonable basis for the additional work to demonstrate clean closure  
9 at these particular closing units.

10 4.4 Ecology changed multiple elements of the sampling strategy required to  
11 demonstrate clean closure in the Modification including the number of samples, location of  
12 samples, and sampling media. The Modification requirements are not based on regulatory  
13 requirements, agency guidance, and are otherwise unreasonable. The Appellants contest  
14 Ecology's changes to the strategy for achieving clean closure at the T Plant and CWC closing  
15 units for the reasons identified in the statement of facts.

#### 16 V. Statement of Facts

17 5.1 Ecology has exceeded its authority and otherwise acted unreasonably to change  
18 the closure plan including the closure standards and sampling requirements for units covered by  
19 the Modification.

20 5.2 The sampling proposed by the Appellants was based on defensible, documented,  
21 explainable professional judgment as the owner and operators of the Hanford Facility. The  
22 Appellants conducted a review of facility operating records consisting of thousands of pages to  
23 confirm what dangerous waste was stored at each unit and if there were any spills or releases  
24 associated with that dangerous waste storage. Furthermore, the Appellants offered to include  
25 Ecology in this records review effort, but the offer was declined.

26 5.3 In accordance with applicable closure requirements, Appellants conducted a





1 visual inspection of each unit to further determine the number and location of samples based on  
2 conditions observed in the field. During the visual inspection, the Appellants looked for signs of  
3 a spill or release in accordance with applicable EPA and Ecology guidance documents. The  
4 Appellants looked for visible stains (EPA QA/G-5S, Section 4.7), areas with loose containment  
5 or separated joints (EPA QA/G-5S, Section 4.7), and cracks or other openings that could allow  
6 the release of a dangerous waste (Ecology Publication #94-111). Where any such signs were  
7 observed, indicating a pathway for potential contamination to spread, they were identified as  
8 sampling locations.

9       5.4 Ecology performed an inspection of the units in November of 2018, five years  
10 after the Appellants' visual inspections were performed. Ecology revised the sampling strategy  
11 for soil without any evidence that leaks or spills of dangerous or mixed waste occurred, or that  
12 there was a viable pathway. Ecology then issued closure plans that include additional sampling  
13 locations without justification via records or observations from the visual inspection consistent  
14 with signs for contamination spread identified in applicable EPA and Ecology guidance  
15 documents. There is no sound technical or scientific basis for Ecology's "professional judgment"  
16 in the absence of this information.

17       5.5 Ecology has unlawfully and unreasonably applied multiple closure performance  
18 standards in the Modification. The closing units are comprised of a variety of surfaces, including  
19 concrete, asphalt, and gravel. Closure performance standards were based on Model Toxics  
20 Control Act (WAC 173-340) Method B soil cleanup levels for unrestricted land use. For the  
21 concrete sampling media added in Ecology's sampling design, Ecology applied the same MTCA  
22 (WAC 173-340) Method B soil cleanup levels to the concrete media. MTCA soil cleanup  
23 standards do not apply to concrete. Concrete should meet the clean debris surface standard  
24 defined in Table 1 of 40 CFR 268.45, and should not have to meet additional closure  
25 performance standards if no contamination is observed. Appellants further contend that the  
26 accepted physical extraction criteria of removing 0.6 cm of concrete as provided in the



1 Appellants' closure plan is more defensible and less subjective than random concrete chip  
2 sampling as provided in the Modification.

3 5.6 Ecology unlawfully and unreasonably changed the closure plans through the  
4 Modification after Appellants finalized and submitted the closure plans. Appellants have been in  
5 discussion with Ecology since the closure plans were first submitted in 2013, and the closure  
6 strategy has evolved dramatically since that time. After the final closure plans were submitted to  
7 Ecology in August 2018, Ecology changed the closure strategy again, and shared their revised  
8 closure strategies in December 2018. The Appellants informed Ecology that they would defend  
9 the closure strategies agreed to in the submitted final closure plans, and that they would not  
10 make additional changes. Ecology responded by informing the Appellants that they would  
11 rewrite the closure plans themselves to incorporate the strategy changes they deemed  
12 appropriate. For the next eighteen months, Ecology revised the closure plans and eventually  
13 issued them in a draft Modification.

14 5.7 The current RCRA permit per permit condition II.K.6 allows for Deviations from  
15 a unit closure plan required by unforeseen circumstances encountered during closure activities,  
16 which do not impact the overall closure strategy, but provide equivalent results, shall be  
17 documented in the unit-specific Operating Record and made available to Ecology upon request,  
18 or during the course of an inspection. These deviations will also be documented in the  
19 Independent Qualified Registered Profession Engineers certification of closure. There is no  
20 justification for a 24-hour notice of changes.

21 5.8 Appellants reserve the right to add additional grounds for an appeal of the  
22 Modification at the time of the prehearing conference in this matter and as allowed under the  
23 rules of practice for the board.

## 24 VI. Relief Sought

25 Appellants respectfully request that the Board grant the following relief:

- 26 1. Enter a stay of the Modification pending final resolution of this appeal.



1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

- 2. Enter an order invalidating the Modification.
- 3. Such other and further relief as the Board deems appropriate.

Respectfully submitted this 5th day of January 2022.

TUPPER MACK WELLS PLLC

s/James A. Tupper, Jr.  
James A. Tupper, Jr. WSBA No. 16873  
Douglas S. Morrison, WSBA No. 18769

s/ Christopher B. Page  
Christopher B. Page  
General Counsel  
Central Plateau Cleanup Company, LLC  
P.O. Box 1464  
Richland, WA 99352  
Christopher\_b\_page@rl.gov

*Attorneys for Central Plateau Cleanup Co. LLC*

U.S. DEPARTMENT OF ENERGY

s/ Grace J. King  
Grace J. King, WSBA No. 49887  
Monica D. Sheets, CO Bar #21820  
Grace.king@rl.doe.gov  
509-316-8436  
Monica.Sheets@rl.doe.gov  
(509) 376-3500

*Attorneys for U.S. Department of Energy*



1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

DECLARATION OF SERVICE

I declare on oath that on this date I filed the foregoing Notice of Appeal and attached Exhibits with the Pollution Control Hearings Board by electronic mail to:

pchb-shbappeals@elaho.wa.gov

and by mailing the original and one (1) copy, via first-class registered U.S. Mail, postage prepaid, addressed as follows:

Pollution Control Hearings Board  
P. O. Box 40903  
Olympia, WA 98504-0903  
elaho@elaho.wa.gov

I further declare that I served a copy of this appeal on the Department of Ecology by mailing the same via U.S. Mail, postage prepaid, addressed as follows:

Department of Ecology  
Attn: Appeals Processing Desk  
300 Desmond Drive, SE  
Lacey, WA 98503

Signed at Seattle, Washington, this 5th day of January, 2022.

s/Susan Barragan  
Susan Barragan, Legal Assistant

4879-7461-1720, v. 3





# EXHIBIT A





STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

3100 Port of Benton Blvd • Richland, WA 99354 • (509) 372-7950  
711 for Washington Relay Service • Persons with a speech disability can call (877) 833-6341

December 6, 2021

21-NWP-156

Brian T. Vance, Manager  
Richland Operations Office  
United States Department of Energy  
PO Box 550, MSIN: H5-30  
Richland, Washington 99352

Scott Sax, President and Project Manager  
Central Plateau Cleanup Company LLC  
PO Box 1464, MSIN: A7-01  
Richland, Washington 99352

Re: Final Class 3 Permit Modification 8C.2021.1F to the *Hanford Facility Resource Conservation and Recovery Act Permit, Dangerous Waste Portion, Revision 8C, for the Treatment, Storage, and Disposal of Dangerous Waste*, Part V, Closure Unit Group 27, 277-T Building; Closure Unit Group 28, 277-T Outdoor Storage Area; Closure Unit Group 29, 271-T Cage; Closure Unit Group 30, 211-T Pad; Closure Unit Group 37, 221-T Sand Filter Pad; Closure Unit Group 39, 2401-W Waste Storage Building; and Closure Unit Group 41, 221-T Railroad Cut, WA7890008967

References: See page 5

Dear Brian T. Vance and Scott Sax:

This letter issues the Department of Ecology's (Ecology) final permit decision on the draft 8C.2018.6D permit modification (Reference 1), now issued as the final 8C.2021.1F permit modification.

Ecology incorporated the final 8C.2021.1F permit modification in Part V of the *Hanford Facility Resource Conservation and Recovery Act Permit, Dangerous Waste Portion, Revision 8C, for the Treatment, Storage, and Disposal of Dangerous Waste* (Site-wide Permit). The following Closure Unit Groups (CUGs) were incorporated: Central Waste Complex (CWC) CUG-39, 2401-W Waste Storage Building, and T Plant Complex (T Plant) CUG-27, 277-T Building; CUG-28, 277-T Outdoor Storage Area; CUG-29, 271-T Cage; CUG-30, 211-T Pad; CUG-37, 221-T Sand Filter Pad; and CUG-41, 221-T Railroad Cut. In accordance with Washington Administrative Code (WAC) 173-303-840(8)(b), these T Plant and CWC CUGs are effective January 6, 2022.



The Permittees are the United States Department of Energy (USDOE) as owner/operator and Central Plateau Cleanup Company LLC as co-operator. This Class 3 permit modification was required in response to the Environmental Protection Agency Consent Agreement and Final Order (CAFO) against the USDOE for violations of the Resource Conservation and Recovery Act of 1976 (RCRA) program at the Hanford Facility's Solid Waste Operations Complex (Reference 2). The Permittees requested a Class 3 Permit Modification on October 11, 2013 (Reference 3), for the CAFO units and on October 18, 2013 (Reference 4), for the non-CAFO units. The Permittees submitted revised closure plans for 211-T Pad (CUG-30), 277-T Building (CUG-27), 271-T Cage (CUG-29), and 2401-W Waste Storage Building (CUG-39) DWMUs on August 9, 2018 (Reference 5) and for 221-T Sand Filter Pad (CUG-37), 277-T Outdoor Storage Area (CUG-28), and 221-T Railroad Cut (CUG-41) on November 1, 2018 (Reference 6). The Permittees provided additional supplemental information to support these closure plans on October 15, 2018 (Reference 7).

The CAFO units include 277-T Outdoor Storage Area (CUG-28); 271-T Cage (CUG-29); 211-T Pad (CUG-30); 221-T Sand Filter Pad (CUG-37); and 2401-W Waste Storage Building (CUG-39). The non-CAFO units include 277-T Building (CUG-27) and 221-T Railroad Cut (CUG-41).

The Addenda provided for each of the unit groups include the Addendum H, Closure Plan and the Unit-Specific Permit Conditions.

As required by WAC 173-303-840(3)(d), Ecology held a 45-day public comment period from June 8, 2020, through July 24, 2020 (Reference 1). Ecology reopened the public comment period from September 21, 2020, through November 4, 2020 (Reference 8). Ecology received 830 public comments during the public comment period.

Ecology reviewed the comments, and a *Response to Comments* document is on the enclosed DVD (Ecology Publication 21-05-027) and on Ecology's publication website at <https://apps.ecology.wa.gov/publications/summarypages/2105027.html>.

The permit modification can be accessed at the Ecology website:  
<https://fortress.wa.gov/ecy/nwp/permitting/8C.2021.1F/>.

The permit modification is also on the enclosed DVD. A DVD is located at the Hanford Public Information Repositories in Richland, Spokane, and Seattle, Washington, as well as Portland, Oregon. A hard copy and DVD is on file at the locations listed below:

Department of Ecology  
Nuclear Waste Program  
3100 Port of Benton Boulevard  
Richland, Washington 99354

United States Department of Energy  
Administrative Record  
2440 Stevens Center Place  
Richland, Washington 99354



Individuals can request copies of the DVD and hard copies by contacting Ecology's Resource Center at (509) 372-7950.

In accordance with WAC 173-303-830(4)(f)(ii), Ecology's decision to grant or deny a Class 3 Permit Modification request under this section may be appealed under the permit appeal procedures of WAC 173-303-845.

### **Your Right to Appeal**

You have a right to appeal this permit modification to the Pollution Control Hearings Board (PCHB) within 30 days of the date of receipt of this Permit. The appeal process is governed by Chapter 43.21B of the Revised Code of Washington (RCW) and Chapter 371-08 of the WAC. "Date of receipt" is defined in RCW 43.21B.001(2).

To appeal you must do all of the following within 30 days of the date of receipt of this Permit:

- File your appeal and a copy of this Permit with the PCHB (see addresses in this letter). Filing means actual receipt by the PCHB during regular business hours.
- Serve a copy of your appeal and this Permit on Ecology in paper form -- by mail or in person (see addresses below). E-mail is not accepted.

You must also comply with other applicable requirements in Chapter 43.21B of the RCW and Chapter 371-08 of the WAC.

#### **1. To file your appeal with the Pollution Control Hearings Boards**

**Mail appeal to:**

**OR**

**Deliver your appeal in person to:**

The Pollution Control Hearings Board  
PO Box 40903  
Olympia, Washington 98504-0903

The Pollution Control Hearings Board  
1111 Israel Road, Southwest, Suite 301  
Tumwater, Washington 98501

#### **2. To serve your appeal on the Department of Ecology**

**Mail appeal to:**

**OR**

**Deliver your appeal in person to:**

The Department of Ecology  
Appeals Processor  
PO Box 47608  
Olympia, Washington 98504-7608

The Department of Ecology  
Appeals Processor  
300 Desmond Drive Southeast  
Lacey, Washington 98503





Brian T. Vance and Scott Sax  
December 6, 2021  
Page 4 of 6

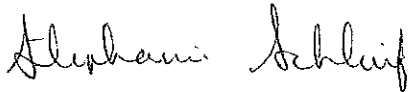
21-NWP-156

**3. Send a copy of your appeal to:**

Kelly Elsethagen  
Department of Ecology  
Nuclear Waste Program  
3100 Port of Benton Boulevard  
Richland, Washington 99354

If there are any questions, please contact Kelly Elsethagen, Project Manager, at [kelly.elsethagen@ecy.wa.gov](mailto:kelly.elsethagen@ecy.wa.gov) or (509) 372-7923 or Debra Alexander, Hanford Facility Revision 8C Dangerous Waste Permit Coordinator, at [debra.alexander@ecy.wa.gov](mailto:debra.alexander@ecy.wa.gov) or (509) 372-7896.

Sincerely,



Stephanie Schleif  
Deputy Program Manager  
Nuclear Waste Program

mkb/jlg

cc: See page 6  
Enclosure



References:

1. Letter 20-NWP-090-Reissue, dated June 3, 2020, "Proposed Class 3 Permit Modification 8C.2018.6D to the *Hanford Facility Resource Conservation and Recovery Act Permit, Dangerous Waste Portion, Revision 8C, for the Treatment, Storage, and Disposal of Dangerous Waste*, Part V, Closure Unit Group 27, 277-T Building; Closure Unit Group 28, 277-T Outdoor Storage Area; Closure Unit Group 29, 271-T Cage; Closure Unit Group 30, 211-T Pad; Closure Unit Group 37, 221-T Sand Filter Pad; Closure Unit Group 39, 2401-W Waste Storage Building; and Closure Unit Group 41, 221-T Railroad Cut, WA7890008967"
2. In the Matter of: U.S. Department of Energy, Docket Number: RCRA-10-2013-0113, Consent Agreement and Final Order, Before the United States Environmental Protection Agency, June 26, 2013
3. Letter 13-ESQ-0074, dated October 11, 2013, "Response to Consent Agreement and Final Order Concerning (CAFO) the Submittal of Closure Plans for Closing Dangerous Waste Management Units (DWMUs)"
4. Letter 14-ESQ-0003, dated October 18, 2013, "Submittal of Additional Closure Plans for Closing Dangerous Waste Management Units (DWMUs) at the T-Plant Complex"
5. Letter 18-AMRP-0150, dated August 9, 2018, "Response to Review Comment Records (RCRs) for Hanford Facility Dangerous Waste Class 3 Permit Modification Request for the Solid Waste Operations Complex (SWOC) Dangerous Waste Management Units Closure Plans"
6. Letter 19-AMRP-0021, dated November 1, 2018, "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"
7. Letter 19-AMRP-0009, dated October 15, 2018, "Supplemental Information to Support the Solid Waste Operations Complex (SWOC) Dangerous Waste Management Unit Closure Plans"
8. Letter 20-NWP-153, dated September 17, 2020, "Reopening of the Public Comment Period for Proposed Class 3 Permit Modification 8C.2018.6D to the *Hanford Facility Resource Conservation and Recovery Act Permit, Dangerous Waste Portion, Revision 8C, for the Treatment, Storage, and Disposal of Dangerous Waste*, Part V, Closure Unit Group 27, 277-T Building; Closure Unit Group 28, 277-T Outdoor Storage Area; Closure Unit Group 29, 271-T Cage; Closure Unit Group 30, 211-T Pad; Closure Unit Group 37, 221-T Sand Filter Pad; Closure Unit Group 39, 2401-W Waste Storage Building; and Closure Unit Group 41, 221-T Railroad Cut, WA7890008967"



cc electronic w/o enc:

Dave Bartus, EPA  
David Einan, EPA  
Kaylin Burnett, USDOE  
Duane Carter, USDOE  
Lori Huffman, USDOE  
Mostafa Kamal, USDOE  
Tony McKarns, USDOE  
Paul Pak, USDOE  
Daniel Pearson, USDOE  
Brian Stickney, USDOE  
Glyn Trenchard, USDOE  
Sheila Davis, BNI  
Brittany Sparks, BNI  
Robert Bullock, CPCCo  
Marc Jewett, CPCCo  
Curt Clement, HMIS  
Jon Perry, HMIS  
Darci Teel, HMIS  
Eric Van Mason, HLMI  
Michael Stephenson, PNNL  
Roger Szelmeczka, WRPS  
ERWM Staff, YN  
Debra Alexander, Ecology  
Jennifer Cantu, Ecology  
Annette Carlson, Ecology  
Suzanne Dahl, Ecology  
Edward Holbrook, Ecology  
Nina Menard, Ecology  
John Price, Ecology  
Stephanie Schleif, Ecology

cc electronic w/enc and DVD:

Tim Hamlin, EPA  
Lori Huffman, USDOE  
Tony McKarns, USDOE  
Sheila Davis, BNI  
Brittany Sparks, BNI  
Mason Murphy, CTUIR  
Jack Bell, NPT  
Rex Buck Jr., Wanapum

Laurene Contreras, YN  
Steve Wiegman, HAB  
David Reeploeg, Hanford  
Communities  
Max Woods, ODOE  
Robin Priddy, BCAA  
Matthew Drumheller, USACE  
Trevor Fox, USFW  
Mike Livingston, WDFW  
Lauren Jenks, WDOH  
John Martell, WDOH  
Randy Treadwell, WSDA  
Allyson Brooks, WSDAHP  
Cindy Preston, WSDNR  
Gonzaga University Foley Center  
Library  
Portland State University Library,  
Government Information  
University of Washington Suzzallo  
Library, Government Publications  
USDOE Public Reading Room, CIC  
Environmental Portal  
Hanford Administrative Record,  
Hanford Site-wide Permit  
Hanford Facility Operating Record  
BNI Correspondence Control  
CPCCo Correspondence Control  
EPA Region 10 Hanford Field Office,  
Correspondence Control  
HMIS Correspondence Control  
PNNL Correspondence Control  
USDOE Correspondence Control  
WRPS Correspondence Control

cc w/enc, DVD and hard copy:

Hanford Administrative Record:  
Hanford Site-wide Permit

cc w/enc, hard copy:

NWP Library: Hanford Site-wide  
Permit

