



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Richland Field Office

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March 9, 2023

23-NWP-013

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

John R. Eschenberg
President and Project Manager
Central Plateau Cleanup Company LLC
PO Box 1464, MSIN: A7-01
Richland, Washington 99352

Re: Proposed Agency-Initiated Permit Modification 8C.2023.1D of the *Hanford Facility Resource Conservation and Recovery Act Permit, Dangerous Waste Portion, Revision 8C, for the Treatment, Storage, and Disposal of Dangerous Waste* WA7890008967, 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

References: See page 4

Dear Brian T. Vance and John R. Eschenberg:

This letter transmits the Department of Ecology's (Ecology) proposed Agency-Initiated Permit Modification 8C.2023.1D to the 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, 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) WA7890008967.

The Permittees are the United States Department of Energy (USDOE) as owner/operator and Central Plateau Cleanup Company LLC (CPCCo) as co-operator. The following is a timeline for modifications involving these units:

- A Class 3 permit modification was initially required in response to the Environmental Protection Agency's (EPA) Consent Agreement and Final Order (CAFO) against the USDOE for violations of the Resource Conservation and Recovery Act (RCRA) of 1976 program at the Hanford Facility's Solid Waste Operations Complex (Reference 1).
- The Permittees requested a Class 3 Permit Modification on October 11, 2013 (Reference 2) for the CAFO units and on October 18, 2013 (Reference 3) 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) Dangerous Waste Management Units (DWMUs) on August 9, 2018 (Reference 4) 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 5).
- The Permittees provided additional supplemental information to support these closure plans on October 15, 2018 (Reference 6).
- On December 6, 2021, Ecology issued a modification (No. 8C.2021.1F) to the Site-wide Permit (Reference 7).
- On January 5, 2022, USDOE and CPCCo appealed the modification to the Pollution Control Hearings Board (PCHB) (Reference 8).

The proposed Agency-Initiated Permit Modification changes to both the Unit-Specific Permit Conditions and Closure Plans set forth in the Settlement Agreement (Reference 8). The changes are as follows:

- The 24-hour notice requirements in the following unit specific permit conditions will be modified to four (4) business days: V.27.B.2 (CUG 27, 277-T Building), V.28.B.2 (CUG 28, 277-T Outdoor Storage Area), V.29.B.2 (CUG 29, 271-T Cage), V.30.B.2 (CUG 30, 211-T Pad), V.37.B.2 (CUG 37, 221-T Sand Filter Pad), V.39.B.2 (CUG 39, 2401-W Waste Storage Building), and V.41.B.2 (CUG 41, 221-T Railroad Cut).
- The types of sampling and number of samples will be modified in the following closure plans: CUG 27, 277-T Building, CUG 28, 277-T Outdoor Storage Area, CUG 29, 271-T Cage, CUG 30, 211-T Pad, and CUG 39, 2401-W Waste Storage Building.
- The concrete decontamination method will be modified in the following closure plans: CUG 27, 277-T Building, CUG 28, 277-T Outdoor Storage Area, CUG 29, 271-T Cage, and CUG 30, 211-T Pad.

Ecology will hold a public comment period from March 13 through April 28, 2023. The Washington Administrative Code (WAC) 173-303-840(3)(d) requires at least a 45-day public comment period for a draft permit modification. A public hearing is not scheduled, but Ecology will consider holding one if there is enough interest.

Before making any final permitting decisions, Ecology will consider all comments on the changes proposed in the permit files received during the public comment period for the draft permit modification.

The proposed permit modification is available on Ecology's website at:
<https://ecology.wa.gov/Waste-Toxics/Nuclear-waste/Public-comment-periods>.

The files will be removed from the website following the closure of the public comment period.

Brian T. Vance and John R. Eschenberg
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A copy of the proposed permit modification is available at the Hanford Public Information Repositories in Richland, Spokane and Seattle, Washington as well as Portland, Oregon. A copy of the proposed permit modification is also available 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 DVD, hard copy, or to view documents in Ecology's Resource Center. Please contact Ecology at hanford@ecy.wa.gov, (509) 578-9298, or (509) 380-4555.

If there are any questions, please contact Morgan Baker, CAFO Permit Lead, at (509) 392-1461 Morgan.Baker@ecy.wa.gov or Debra Alexander, Project Manager, at (509) 212-3505 or Debra.Alexander@ecy.wa.gov.

Sincerely,



Stephanie Schleif
Deputy Program Manager
Nuclear Waste Program

lm/lb

Enclosure: Hyperlink above

1. <https://ecology.wa.gov/Waste-Toxics/Nuclear-waste/Public-comment-periods>.

cc: See Page 5

References:

1. 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
2. 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)"
3. 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"
4. 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"
5. 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"
6. 19-AMRP-0009, dated October 15, 2018, "Supplemental Information to Support the Solid Waste Operations Complex (SWOC) Dangerous Waste Management Unit Closure Plans"
7. 21-NWP-156, dated December 6, 2021, "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"
8. Pollution Control Hearings Board [PCHB] No. 22-001

cc electronic w/enc:

David Einan, EPA	Cindy Preston, WSDNR
Tim Hamlin, EPA	Debra Alexander, Ecology
Michelle Mullin, EPA	Morgan Baker, Ecology
Duane Carter, USDOE	Jennifer Cantu, Ecology
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Curt Clement, HMIS	Stacie Sexton, Ecology
Jon Perry, HMIS	Ed Soto, Ecology
Darci Teel, HMIS	Gonzaga University Foley Center Library
Michael Stephenson, PNNL	Portland State University Library,
Roger Szelmezcza, WRPS	Government Information
Mason Murphy, CTUIR	University of Washington Suzzallo Library,
Jack Bell, NPT	Government Publications
Alyssa Buck, Wanapum	USDOE Public Reading Room, CIC
Laurene Contreras, YN	Environmental Portal
ERWM Staff, YN	Hanford Administrative Record,
Susan Coleman, HAB	Hanford Site-wide Permit
David Reeploeg, Hanford	Hanford Facility Operating Record
Communities	BNI Correspondence Control
Max Woods, ODOE	CPCCo Correspondence Control
Robin Priddy, BCAA	HAB Correspondence Control
Matthew Drumheller, USACE	HLMI Correspondence Control
Trevor Fox, USFW	HMIS Correspondence Control
Mike Livingston, WDFW	PNNL Correspondence Control
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