DFLAW Operating Permit Modification

Public comment period
Feb. 10 – March 26, 2020

Please submit comments
Electronically (preferred) via:
http://nw.ecology.commentinput.com/?id=h8CRV
By U.S. Mail, or hand-delivery:
Daina McFadden
3100 Port of Benton Blvd.
Richland WA 99354

Public hearing
A public hearing is not scheduled, but if there is enough interest, we will consider holding one. To request a hearing or for more information, contact:
Daina McFadden
509-372-7950
Hanford@ecy.wa.gov

Special accommodations
To request ADA accommodation including materials in a format for the visually impaired, call Ecology at 360-407-6831 or visit https://ecology.wa.gov/accessibility.
People with impaired hearing may call Washington Relay Service at 711.
People with speech disability may call TTY at 877-833-6341.

Public comment invited

The Waste Treatment Plant (WTP) is located on the Hanford Site in southeastern Washington. The plant will immobilize in glass (vitrify) 56-million gallons of dangerous radioactive and chemical waste currently stored in 177 underground storage tanks at Hanford.

The permittees are:
U.S. Department of Energy, Office of River Protection
P.O. Box 450
Richland, Washington 99352

Bechtel National, Inc.
2435 Stevens Center Place
Richland, Washington 99354


The proposed modification incorporates operating details to support DFLAW operating configuration for the Low-Activity Waste and Effluent Management Facilities.

Background
The WTP includes multiple facilities: Analytical Laboratory (Lab), Low-Activity Waste (LAW) Facility, High-Level Waste (HLW) Facility, Pretreatment Facility (PTF), Effluent Management Facility (EMF) and Balance of Facilities (BOF).
The WTP will be operated in two processing configurations. For near-term operations, WTP will be operated in the DFLAW configuration requiring the Lab, LAW, and EMF to become operational first to process the low-activity waste from tank farms.

In the DFLAW configuration, the waste is pretreated to remove cesium and solids before the waste is sent to the LAW facility. In this configuration, the pretreated waste will bypass the PTF and be fed directly from the tank farms to the LAW facility. The LAW facility is where the low-activity fraction of the waste will be solidified by vitrification.

The liquid effluents generated in the LAW facility and the Lab are transferred and treated at EMF, which will reduce the effluent volume by evaporation. WTP will later be operated in the baseline configuration when the PTF and the High-Level Waste Facility become operational.

The final step in the WTP phased permitting approach is the development of the operational permits for each facility. The Lab completed this step in 2017 and has an operating permit. This current permit modification provides the operational details for LAW and EMF.

**Proposed Changes**

This permit modification will add a description of operations to the WTP Dangerous Waste Permit for LAW and EMF. The modification describes operations, provides clarification between the baseline and DFLAW configurations, and adds details to ensure the operating permit is compliant with all dangerous waste regulations. The modification proposes changes to the following:

- Unit-Specific Permit Conditions
- Part A Form
- Chapter 3, Waste Analysis Plan
- Chapter 3A, Waste Analysis Plan for the Baseline Configuration
- Chapter 3B, Quality Assurance Project Plan
- Chapter 3C, Waste Analysis Plan for the DFLAW Configuration
- Chapter 4, Process Information
- Chapter 4E, Low-Activity Waste Facility
- Chapter 4G, Direct Feed Low-Activity Waste (Effluent Management Facility)
- Chapter 4I, Balance of Facilities
- Chapter 6, Procedures to Prevent Hazards
- Chapter 6A, Inspection Plan
- Chapter 7, Building Emergency Plan
- Chapter 8, Personnel Training
- Updates to multiple appendices, including the interim compliance schedules

Supporting information for this modification includes:

- Dangerous Waste Training Plan – Supplemental information developed to meet Washington Administrative Code requirements. This document will be placed in the operating record and will not be included as part of the Dangerous Waste Permit.
- Chapter 12, Reporting and Recordkeeping – This chapter is proposed to be removed from the Dangerous Waste Permit because the information is duplicated in Permit Conditions II.I, Facility Operating Record, and throughout the WTP Permit.
Interim compliance schedule items completed with this permit modification include: LAW-3 through LAW-7, LAW-11, LAW-14, LAW-15, LAW-17, LAW-25, LAW-45, as well as EMF-3 through EMF-7, EMF-11, and EMF-45.

**Reviewing the proposed changes**

Ecology invites you to review and comment on this proposed DFLAW Operating Permit Modification. See page 1 for comment period dates and information on how to submit comments.

Copies of the application for the proposed permit and supporting documentation will be available during the public comment period online at Ecology’s website at [https://ecology.wa.gov/Waste-Toxics/Nuclear-waste/Public-comment-periods](https://ecology.wa.gov/Waste-Toxics/Nuclear-waste/Public-comment-periods). The documents will also be available at the Hanford Public Information Repositories listed on page 4.

Ecology will consider and respond to all significant comments received during the public comment period. We will document our responses and issue a response to comments document when we make our final permitting decision.
Hanford’s Information Repositories and Document Review Locations

**Washington**

**Richland**
Ecology Nuclear Waste Program
Resource Center
3100 Port of Benton Blvd.
Richland, WA 99354
509-372-7950

U.S. Department of Energy
Administrative Record
2440 Stevens Drive, Room 1101
Richland, WA 99354
509-376-2530

Washington State University Tri-Cities
Department of Energy Reading Room
2770 Crimson Way, Room 101L
Richland, WA 99354
509-375-7443

**Seattle**
University of Washington
Suzzallo Library
P.O. Box 352900
Seattle, WA 98195
206-543-5597

**Spokane**
Gonzaga University
Foley Center
502 E Boone Avenue
Spokane, WA 99258
509-313-6110

**Oregon**

**Portland**
Portland State University
Millar Library
1875 SW Park Avenue
Portland, OR 97207
503-725-4542