February 5, 2020

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Re: Proposed Class 3 Draft Permit Modification 8C.2019.1D for the Direct Feed Low-Activity Waste Operations to 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), Part III, Operating Unit Group 10, Waste Treatment and Immobilization Plant, WA7890008967

References: See page 3

Dear Addressees:

This letter transmits the proposed draft permit modification 8C.2019.1D to Part III, Operating Unit Group 10, Waste Treatment and Immobilization Plant, of the Hanford Facility Resource Conservation and Recovery Act Permit, Dangerous Waste Portion, Revision 8C, for the Treatment, Storage and Disposal of Dangerous Waste.
The Permittees are the United States Department of Energy (USDOE) as owner/operator and Bechtel National, Inc. (BNI), as co-operator. The Permittees held a public comment period regarding the Class 3 permit modification request for the Low-Activity Waste Facility and Effluent Management Facility from July 1, 2019 through August 30, 2019 (Reference 1). The Permittees held a public meeting on July 30, 2019, at the Richland Public Library at 955 Northgate in Richland, Washington.

Ecology received nine public comments from the comment period. As a result of the public comments received, and after performing a completeness determination and technical review (Reference 2 and 3), Ecology requested information from the Permittees and made modifications, as detailed below, to the draft permit:

- Ecology added permit condition III.10.C.17 to address the timeframe in which the Permittees may request technical assistance from Ecology while starting Operations.
- Ecology added language to Interim Compliance Schedule Item LAW-1. The Interim Compliance Schedule Item proposes to add the following statements to the existing item: “Submit additional documentation not available for any additional proposed permit conditions at the time of permit issuance to Ecology. Ecology will make a determination if additional permit conditions should be added.”
- Ecology also requested two drawings that have not been incorporated. The drawings are being submitted with this permit modification.


Washington Administrative Code 173-303-840(3)(d) requires at least a 45-day public comment period for the draft permit modification. Ecology will hold this public comment period from February 10, 2020 through March 26, 2020. This comment period initiates the second portion of the Class 3 Permit Modification. A public hearing is not scheduled, but Ecology will consider holding one if there is enough interest.

This proposed Class 3 draft permit modification will add the following to Operating Unit Group 10, Waste Treatment and Immobilization Plant (WTP), Part III of the Hanford Site-wide Permit: operating permit conditions to support the Direct Feed Low-Activity Waste processes, including specific permit conditions for the Low-Activity Waste Facility (LAW) and the Effluent Management Facility (EMF); updated chapters; updated Interim Compliance Schedules for the LAW and EMF; and engineering drawings to support the LAW and EMF.
The proposed draft permit modification is presented on the enclosed DVD, and on Ecology’s website at http://www.ecy.wa.gov/programs/nwp/commentperiods.htm. A DVD is also at the Hanford Public Information Repositories in Richland, Spokane, and Seattle, Washington, as well as Portland, Oregon. A hard copy 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 by contacting Ecology’s Resource Center at (509) 372-7950.

If there are any questions, please contact Mandy Jones, Permit Lead, at mandy.jones@ecy.wa.gov or (509) 372-7916 or Annette Carlson, Permit Coordinator, at annette.carlson@ecy.wa.gov, or (509) 372-7897.

Sincerely,

Stephanie Schleif
Deputy Program Manager
Nuclear Waste Program

cc: See page 4
References:


cc: cc electronic w/o enc:
    Dave Bartus, EPA
    David Einan, EPA
    Mary Beth Burandt, USDOE-ORP
    Lori Huffman, USDOE-ORP
    Christopher Kemp, USDOE-ORP
    Glyn Trenchard, USDOE-ORP
    Duane Carter, USDOE-RL
    Joe Franco, USDOE-RL
    Mostafa Kamal, USDOE-RL
    Tony McKarns, USDOE-RL
    Brittany Sparks, BNI
    Laura Cusack, CHPRC
    Moussa Jaraysi, CHPRC
    Curt Clement, MSA
    Jon Perry, MSA
    Darci Teel, MSA
    ERWM Staff, YN

cc w/enc, DVD:
    Tim Hamlin, EPA
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    Mike Livingston, WDFW
    John Martell, WDOH
    John Wiesman, WDOH
    Randy Treadwell, WSDA
    Allyson Brooks, WSDAHP

cc w/enc, DVD and hard copy:
    Hanford Administrative Record: Hanford Site-wide Permit
    NWP Central File