



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

September 8, 2021

21-NWP-124

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: Proposed Class 3 Permit Modification 8C.2020.1D 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 11, Integrated Disposal Facility (IDF Permit), WA7890008967*

References: See page 3

Dear Brian T. Vance and Scott Sax:

This letter transmits the Department of Ecology's (Ecology) proposed Class 3 Permit Modification 8C.2020.1D to Part III, Operating Unit Group 11, Integrated Disposal Facility, of the *Hanford Facility Resource Conservation and Recovery Act Permit, Dangerous Waste Portion, Rev. 8c for the Treatment, Storage and Disposal of Dangerous Waste*.

The Permittees are the United States Department of Energy (USDOE) as owner/operator and Central Plateau Cleanup Company LLC (CPCCo) as co-operator. The Permittees initially proposed the Class 3 Permit Modification C3-IDF-2019-01 on December 6, 2019 (Reference 1).

USDOE held a public comment period regarding the Class 3 Permit Modification request for the Integrated Disposal Facility from December 16, 2019 through February 14, 2020. They held a public meeting on January 21, 2020, at the Richland Public Library, at 5:30 p.m. Ecology reviewed USDOE's draft Class 3 Permit Modification submittal and determined it is complete (Reference 2).

Ecology received 26 public comments from USDOE's comment period. As a result of the public comments received and after performing a technical review (Reference 3), Ecology requested the following information from the Permittees and made the following modifications to the draft submittal:

- Additional engineering drawings and documents necessary to support the drafting of the IDF Permit. The drawings and documents are being submitted with this draft permit modification.
- Details to support the waste acceptance criteria for the IDF.
- Additional waste streams description. Appendix BB, Waste Streams Descriptions, is being submitted with this draft permit modification.

- Ecology deleted Appendices C7, Leachate Monitoring Plan, and C8, Sub-Surface Liquids Monitoring and Operation Plan, from the draft permit modification at the request of the Permittees.
- Ecology removed Chapter 2.0 from the IDF Permit.
- Ecology removed Chapter 6.0, Procedures to Prevent Hazards and replaced it with three Addenda, Security, Preparedness and Prevention and Inspection Plan.
- Ecology replaced the existing contingency plans with the Facility Response Plan.
- Ecology deleted Chapter 13.0 and ensured this information was incorporated into the permit text.
- Ecology added and/or updated permit conditions to support the start of Active Life at the IDF.

Ecology issued a *Response to Comments* document from the public comment period. Ecology's *Response to Comments* document is on the enclosed DVD (Ecology Publication 21-05-021) Ecology's publication website at <https://apps.ecology.wa.gov/publications/summarypages/2105021.html>.

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 September 13 through October 28, 2021. 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 Permit Modification would update all chapters of the IDF Permit. The modification would provide detailed information to support the operation and maintenance of the IDF. The proposed modification also incorporates new and modified information, which includes authorization for use of the second IDF disposal cell to dispose of mixed waste and the addition of a storage pad and a treatment pad. The permit modification would allow the Permittees to dispose of Immobilized Low-Activity Waste and other secondary waste to support tank waste treatment and the Direct Feed Low-Activity Waste mission, which plays an important part of the Hanford cleanup process.

The proposed permit modification is on the enclosed DVD and on Ecology's website at <https://ecology.wa.gov/Waste-Toxics/Nuclear-waste/Public-comment-periods>. 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 and hard copies by contacting Ecology's Resource Center at (509) 372-7950.

Brian T.Vance and Scott Sax
September 8, 2021
Page 3 of 4

21-NWP-124

If there are any questions, please contact Nancy Ware, Permit Lead, at nancy.ware@ecy.wa.gov or (509) 372-7912, or Mandy Jones, Permit Coordinator, at mandy.jones@ecy.wa.gov or (509) 372-7916.

Sincerely,



Stephanie Schleif
Deputy Program Manager
Nuclear Waste Program

nw/ag
Enclosure

References:

1. Letter 20-AMRP-007, dated December 6, 2019, “Submittal of Hanford Facility Dangerous Waste Class 3 Permit Modification Request to Update the Operating Permit for the Integrated Disposal Facility (IDF) Operating Unit Group (OUG) 11”
2. Letter 20-NWP-047, dated March 6, 2020, “Department of Ecology’s(Ecology) Completeness Determination for the Operations Class 3 Modification for the Hanford Facility Resource Conservation and Recovery Act Permit, Dangerous Waste Portion, Revision 8C, for the Treatment, Storage, and Disposal of Dangerous Waste, Part III, Operating Unit Group 11, Integrated Disposal Facility (IDF) Permit, WA7890008967”
3. Letter 20-NWP-176, dated November 16, 2020, “Technical Review for the Class 3 Permit Modification Request to Update the Operating Permit for the Hanford Facility Resource Conservation and Recovery Act Permit, Dangerous Waste Portion, Revision 8C, for the Treatment, Storage, and Disposal of Dangerous Waste, Part III, Operating Unit Group 11, Integrated Disposal Facility (IDF) Permit, WA7890008967”
4. Letter 20-ESQ-0069, dated June 22, 2020, ‘Supplemental Information for the Integrated Disposal Facility Operating Unit Group 11 Class 3 Permit Modification Request’
5. Letter 21-ECD-001740, dated June 9, 2021, “Response to Technical Deficiencies for the Integrated Disposal Facility Operating Unit Group 11 Class 3 Permit Modification Request”

cc: See pages 4

cc electronic w/o enc:

Dave Bartus, EPA
David Einan, EPA
Kaylin Burnett, USDOE-ORP
Lori Huffman, USDOE-ORP
Paul Pak, USDOE-ORP
Glyn Trenchard, USDOE-ORP
Duane Carter, USDOE-RL
Mostafa Kamal, USDOE-RL
Tony McKarns, USDOE-RL
Gary Pyles, USDOE-RL
Brian Stetter, USDOE-RL
Brian Stickney, USDOE-RL
Sheila Davis, BNI
Brittany Sparks, BNI
Robert Bullock, CPCCo
Erika Garcia, CPCCo
Leah Hare, CPCCo
Randy Havenor, CPCCo
Marc Jewett, CPCCo
Curt Clement, HMIS

Jon Perry, HMIS
Darci Teel, HMIS
Roger Szelmeczka, WRPS
ERWM Staff, YN
Michael Stephenson, PNNL
Debra Alexander, Ecology
Jennifer Cantu, Ecology
Annette Carlson, Ecology
Suzanne Dahl, Ecology
Jay Decker, Ecology
Tracy Gao, Ecology
Dib Goswami, Ecology
Katie Hall, Ecology
Edward Holbrook, Ecology
Mandy Jones, Ecology
Nina Menard, Ecology
John Price, Ecology
Stephanie Schleif, Ecology
Dan Thompson, Ecology
Nancy Ware, Ecology
Jerry Yokel, Ecology

cc electronic w/enc, DVD:

Tim Hamlin, EPA
Lori Huffman, USDOE-ORP
Duane Carter, USDOE-RL
Mostafa Kamal, USDOE-RL
Tony McKarns, USDOE-RL
Gary Pyles, USDOE-RL
Brian Stetter, USDOE-RL
Brian Stickney, USDOE-RL
Sheila Davis, BNI
Brittany Sparks, BNI
Robert Bullock, CPCCo
Erika Garcia, CPCCo
Leah Hare, CPCCo
Randy Havenor, CPCCo
Marc Jewett, CPCCo
Mason Murphy, CTUIR
Jack Bell, NPT
Rex Buck, Jr., Wanapum
Laurene Contreras, YN
Susan Leckband, 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 Facility Operating Record
BNI Correspondence Control
CPCCo Correspondence Control
EPA Region 10 Hanford Field Office,
Correspondence Control
HMIS Correspondence Control
PNNL Correspondence Control
USDOE-ORP Correspondence Control
USDOE-RL Correspondence Control
WRPS Correspondence Control

cc w/enc, DVD and hard copy:

Hanford Administrative Record: Hanford Site-wide Permit