



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Richland Field Office

3100 Port of Benton Blvd., Richland, WA 99354 • 509-372-7950

July 21, 2022

22-NWP-108

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

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

Re: Reopening of the Proposed Class 3 Permit Modification 8C.2022.2D 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 (OUG 11), Integrated Disposal Facility (IDF Permit), WA7890008967

References: See page 3

Dear Brian T. Vance and John Eschenberg:

This letter transmits the Department of Ecology's (Ecology) reopening of the proposed Class 3 Permit Modification 8C.2022.2D to the IDF Permit.

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

The Permittees held a 60-day public comment period regarding the proposed Class 3 Permit Modification request for the IDF Permit from December 16, 2019, through February 14, 2020. A public meeting was held on January 21, 2020, at the Richland Public Library, at 5:30 p.m. Ecology reviewed the Class 3 Permit Modification submittal and determined it was incomplete (Reference 2).

Ecology received 26 public comment submittals during the public comment period. As a result of the public comments received, and after requesting the additional information from the Permittees and performing a technical review (References 3, 4, and 5), Ecology made modifications in preparation for the draft permit.

Ecology issued a Response to Comments document from the Permittees' public comment period. Our Response to Comments document is on the enclosed DVD (Ecology Publication 21-05-021) and on 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 a draft permit. Ecology transmitted the draft permit on September 8, 2021, and held a public comment period from September 13 through October 28, 2021 (Reference 6). This comment period initiated the second portion of the Class 3 Permit Modification. A public hearing was not held.

Based on the public comments received during this 45-day public comment period, Ecology determined that several draft permit files needed to be updated to support this permit modification. Ecology will reopen the public comment period for an additional 45-days including the necessary associated documentation, as detailed in WAC 173-303-840(7). The re-opened public comment period will run from July 25 through September 9, 2022.

This re-opened public comment period for the IDF Permit will include Appendix C6, "Construction Specifications", which was not included in the previous 45-day public comment period. Additionally, Ecology made updates to incorporate the changes approved through a Class ¹ permit modification (PCN-IDF-2021-01). Ecology re-incorporated language that was previously deleted in error and included a figure that was previously not available for public review due to a technical issue. Ecology made additional changes in the following draft permit files:

- Unit-Specific Permit Conditions
- Addendum C, "Process Information"
- Appendix C1, "Phase I Critical Systems Design Report"
- Appendix C3, "Design Drawings"
- Addendum D, "Groundwater Monitoring Plan"
- Appendix DA, "Quality Assurance Project Plan"
- Appendix DB, "Sampling Protocol"
- Appendix DC, "Well Construction" (previously titled "Well As-Built Diagrams and Proposed Well Locations")
- Addendum E, "Security"
- Addendum G, "Personnel Training"
- Appendix HA, "Sampling and Analysis Plan"
- Addendum I, "Inspection Plan"

On April 6, 2022, Ecology received a Temporary Authorization (TA) request from the Permittees detailing a limited scope of construction activity to begin for the IDF Storage Pad (Reference 7). On April 27, 2022, Ecology responded to the TA request and approved the work requested by the Permittees (Reference 8).

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 available 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 Naoko Schiffern, Lead Permit Writer, at (509) 380-1993 or naoko.schiffern@ecy.wa.gov, or Dan McDonald, Project Manager, at (509) 942-4972 or dan.mcdonald@ecy.wa.gov.

Sincerely,



Stephanie Schleif
Deputy Program Manager
Nuclear Waste Program

ns/aa
Enclosure

References:

1. Letter 20-AMRP-0007, 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-ESQ-0069, dated June 22, 2020, "Supplemental Information for the Integrated Disposal Facility Operating Unit Group 11 Class 3 Permit Modification Request"
4. 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"
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"
6. Letter 21-NWP-124, dated September 8, 2021, "Proposed Class 3 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), WA 7890008967"
7. Letter 22-ECD-000808, dated April 5, 2022, "Submittal for Temporary Authorization to Implement Class 3 Modification for Construction of the Storage Pad at the Integrated Disposal Facility Operating Unit Group 11"
8. Letter 22-NWP-068, dated April 27, 2022, "Submittal for Temporary Authorization to Implement Class 3 Modification for Construction of the Storage Pad at the Integrated Disposal Facility Operating Unit Group 11"

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Site-wide Permit
Hanford Facility Operating Record
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CPCCo Correspondence Control
EPA Region 10 Hanford Field Office
Correspondence Control
HAB 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