



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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September 24, 2020

20-NWP-155

Brian T. Vance, Manager
Office of River Protection
United States Department of Energy
PO Box 450, MSIN: H6-60
Richland, Washington 99352

John R. Eschenberg, President
Washington River Protection Solutions
PO Box 850, MSIN: H3-04
Richland, Washington 99352

Re: Reopening of the Proposed Class 3 Permit Modification, 8C.2020.3D 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 1, Low-Activity Waste Pretreatment System (LAWPS), WA7890008967

References: See page 3

Dear Brian T. Vance and John R. Eschenberg:

This letter transmits the reopening of the proposed permit modification 8C.2020.3D to Part III, Operating Unit Group 1 (OUG 1), Low-Activity Waste Pretreatment System (LAWPS), to the *Hanford Facility Resource Conservation and Recovery Act Permit, Dangerous Waste Portion, Rev 8C, for the Treatment, Storage, and Disposal of Dangerous Waste* (Site-wide Permit).

The Permittees are the United States Department of Energy-Office of River Protection (USDOE-ORP) as owner/operator and Washington River Protection Solutions as co-operator.

USDOE-ORP held a 60-day public comment period regarding the proposed Class 3 Permit Modification request for the LAWPS OUG 1 from May 1 through June 30, 2019 (Reference 1). USDOE-ORP held a public meeting on May 29, 2019, at the Richland Public Library. The Department of Ecology (Ecology) received four public comment submittals during USDOE-ORP's comment period.

Ecology performed a completeness determination and technical review as required in Washington Administrative Code (WAC) 173-303-840(1)(b) (References 2 and 4) and determined the permit application incomplete. Ecology documented the technical deficiencies, and additional items, through a Response Comment Record. After receiving additional documentation from the Permittees that made the application complete (Reference 3), Ecology worked with the Permittees to resolve the technical deficiencies. The Permittees submitted a revised set of final files on April 16, 2020 (Reference 5) to support the permit modification.

Ecology has determined that this permit application is complete and we have made the following modifications to support the development of the draft permit:

- Added Appendices with supporting design media (specifications, calculations, reports, and engineering drawings).
- Added Unit-Specific Permit Conditions focused on the construction and operation requirements found in WAC 173-303-630, *Use and management of containers* and WAC 173-303-640, *Tank systems*.
- Added two new Interim Compliance Schedule Items, LAWPS-1 and LAWPS-2 to support the long-term disposal of the Ion Exchange Columns and receipt of additional technical details necessary to support operations of the LAWPS OUG.

Ecology issued a Response to Comments document from USDOE-ORP's public comment period. Ecology's Response to Comments document is provided on the enclosed DVD (Ecology Publication 20-05-017) and on Ecology's website at <https://fortress.wa.gov/ecy/publications/SummaryPages/2005017.html>.

WAC 173-303-840(3)(d) requires at least a 45-day public comment period for a draft permit. Ecology held a public comment period from June 22 through August 7, 2020. This comment period initiated the second portion of the Class 3 Permit Modification. A public hearing was not held.

During the 45-day public comment period, Ecology received a comment that required Ecology to update the State Environmental Policy Act (SEPA) documentation necessary to support this modification. The SEPA Determination of Significance and Notice of Adoption was hosted on the SEPA register and a notice was sent to the public listserv on August 24, 2020.

Ecology is reopening the public comment period for the LAWPS OUG 1, for an additional 45 days, to begin September 28 through November 12, 2020, according to WAC 173-303-840(7).

The proposed Class 3 Permit Modification would add the LAWPS OUG 1, to the Site-wide Permit. This permit modification includes the same permit documents as previously provided during the comment period held from June 22 through August 7, 2020. The proposed modification (8C.2020.3D) provides design and construction details for the LAWPS OUG 1 and the associated SEPA decision documents.

The complete proposed permit modification is on the enclosed DVD and on Ecology's website: <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 Yoana Lucatero, Lead Permit Writer, at (509) 372-7917 or yluc461@ecy.wa.gov, or Mandy Jones, Permit Coordinator, at (509) 372-7916 or mjon461@ecy.wa.gov.

Sincerely,

 Digitally signed
by Schleif,
Stephanie (ECY)

Stephanie Schleif
Deputy Program Manager
Nuclear Waste Program

yl/ag
Enclosure

cc: See page 4

References:

1. Letter 19-ECD-0028, dated April 24, 2019, "Submittal of the Proposed Class 3 Modification of the Hanford Facility Dangerous Waste Part B Permit Application for the Low-Activity Waste Pretreatment System (TS-2-8)"
2. Letter 19-NWP-103, dated July 3, 2019, "Department of Ecology's (Ecology) Completeness Review for the Class 3 Modification to the Hanford Facility Resource Conservation and Recovery Act Permit, Dangerous Waste Portion, Rev 8C, for the Treatment, Storage, and Disposal of Dangerous Waste, Part III, Operating Unit Group 1, Low-Activity Waste Pretreatment System (LAWPS), WA7890008967"
3. Letter 19-ECD-0079, dated October 31, 2019, "Submittal of Additional Technical and Design Information for the Dangerous Waste Part B Permit Application for the Low-Activity Waste Pretreatment System (TS-2-8)"
4. Letter 20-NWP-034, dated February 14, 2020, "Technical Review for the Class 3 Modification to the Hanford Facility Resource and Recovery Act Permit, Dangerous Waste Portion, Rev. 8C, for the Treatment, Storage, and Disposal of Dangerous Waste, Part III, Operating Unit Group 1, Low-Activity Waste Pretreatment System (LAWPS), WA7890008967"
5. Letter 20-ECD-0019, dated April 16, 2020, "Submittal of Responses to Technical Review Comments on the Class 3 Modification for the Hanford Facility Dangerous Waste Part B Permit Application for the Low-Activity Waste Pretreatment System (TS-2-8)"

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
Robert Bullock, CHPRC
Moussa Jaraysi, CHPRC
Curt Clement, MSA
Jon Perry, MSA

Darci Teel, MSA
ERWM Staff, YN
Michael Stephenson, PNNL
Eric Van Mason, WRPS
Debra Alexander, Ecology
Jennifer Cantu, Ecology
Annette Carlson, Ecology
Suzanne Dahl, Ecology
Katie Hall, Ecology
Mandy Jones, Ecology
Nina Menard, Ecology
John Price, Ecology
Stephanie Schleif, Ecology
Dan Thompson, Ecology
Chris Wend, Ecology

cc electronic w/enc and DVD:

Tim Hamlin, EPA
Tony McKarns, USDOE-RL
Lori Huffman, USDOE-ORP
Brittany Sparks, BNI
Mason Murphy, CTUIR
Jack Bell, NPT
Rex Buck Jr., Wanapum
Laurene Contreras, YN
Susan Leckband, HAB
David Reeploeg, Hanford Communities
Jeff Burright, ODOE
Max Woods, ODOE
Robin Priddy, BCAA
Matthew Drumheller, USACE
Trevor Fox, USFW
Mike Livingston, WDFW
John Martell, WDOH
John Wiesman, WDOH
Randy Treadwell, WSDA
Allyson Brooks, WSDAHP
Cindy Preston, WSDNR

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CHPRC Correspondence Control
Environmental Portal
Gonzaga University Foley Center Library
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Hanford Facility Operating Record
MSA Correspondence Control
NWP RIM Coordinators, Ecology
PNNL Correspondence Control
Portland State University Library,
 Government Information
University of Washington Suzzallo Library,
 Government Publications
USDOE-ORP Correspondence Control
USDOE Public Reading Room, CIC
USDOE-RL Correspondence Control
EPA Region 10 Hanford Field Office,
 Correspondence Control
WRPS Correspondence Control

cc w/enc, DVD and hard copy:

Hanford Administrative Record: Hanford Site-wide Permit