



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

October 28, 2020

20-NWP-170

Brian T. Vance, Manager
Office of River Protection
United States Department of Energy
PO Box 450, MSIN: H6-60
Richland, Washington 99354

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

Valerie McCain, Project Director
Bechtel National, Inc.
2435 Stevens Center Place, MSIN: MS19-A
Richland, Washington 99354

Ty Blackford, President and CEO
CH2M HILL Plateau Remediation Company
PO Box 1600, MSIN: A7-01
Richland, Washington 99352

Robert E. Wilkinson, President
Mission Support Alliance, LLC
PO Box 650, MSIN: H1-30
Richland, Washington 99352

Michael H. Schlender,
Deputy Director for Operations
Pacific Northwest National Laboratory
PO Box 999, MSIN: K1-46
Richland, Washington 99352

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

Re: Transmittal of the Department of Ecology's Legal Copy of 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), WA7890008967, Quarter Ending September 30, 2020 (8C.2020.Q3)

Reference: See page 4

Dear Addressees:

The Department of Ecology (Ecology) reviewed the United States Department of Energy's (USDOE) letter 20-ESQ-0106 and enclosures (Reference). Ecology confirms that we approved the Class 1¹ Modifications and concurred with the Class 1 Modifications listed in Reference 1 in the quarter ending September 30, 2020. Ecology incorporated the modifications into the Site-wide Permit.

The enclosed DVD contains a legal copy of the Site-wide Permit. All permitting and compliance work must be completed under the legal version of the Site-wide Permit.

Legal hard copies of the Site-wide Permit are 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
Hanford Administrative Record
2440 Stevens Center Place
Richland, Washington 99354

A copy of the Site-wide Permit is available on the web at:

<https://fortress.wa.gov/ecy/nwp/permitting/hdwp/rev/8c/index.html>. Individuals can request copies of the Site-wide Permit on DVD or hard copy by contacting Ecology's Resource Center at (509) 372-7950.

Portions of the Site-wide Permit contain Confidential Business Information or Official Use Only documents. This information is not available for public review.

Ecology approved the following Class ¹ Modifications and concurred with the Class 1 Modifications in the quarter ending September 30, 2020:

Permit Attachments:

Permit Attachment 4A (Building Emergency Directors/Building Wardens)

PCN-4A-2020-01

- Permit Attachment 4A (Building Emergency Directors/Building Wardens) – Class 1 Modification, concurred with on September 14, 2020.

Part III Unit-Specific Conditions for Final Status Operations:

Liquid Effluent Retention Facility (LERF) & 200 Area Effluent Treatment Facility (200 Area ETF), Operating Unit Group 3

Ecology updated the LERF & 200 Area ETF Unit-Specific Permit Conditions by merging the 8C.2020.5F, 8C.2020.6F, and PCN-LERF/ETF-2020-01 approved permit modifications into the current file. Ecology discussed this with USDOE and Washington River Protection Solutions, LLC on August 26, 2020. Ecology updated the Unit-Specific Permit Conditions file in the Site-wide Permit.

Waste Treatment and Immobilization Plant, Operating Unit Group 10

24590-LAW-PCN-ENV-19-008

- Appendix 9.2 (Low-Activity Waste Building Piping and Instruction Diagrams) – Class ¹ Modification, approved on July 22, 2020.

24590-LAW-PCN-ENV-19-010

- Appendix 9.2 (Low-Activity Waste Building Piping and Instrumentation Diagrams) – Class ¹1 Modification, approved on July 9, 2020.

The Piping and Instrumentation Diagram (P&ID) 24590-LAW-M6-LMP-00012001, Revision 1 is not included in the enclosures of the referenced letter (Letter 20-ESQ-0106) and is not included in the Hanford Administrative Record/Public Information Repository. Even though the P&ID is not included in the referenced letter, Ecology received the correct P&IDs from the Permittees in Letter 20-ECD-0030. The changes are described on the Hanford Facility RCRA Permit Modification Notification Form (PCN Form). Ecology updated the Site-wide Permit accordingly.

Integrated Disposal Facility, Operating Unit Group 11

PCN-IDF-2020-04

- Unit-Specific Permit Conditions – Class 1 Modification, concurred with on September 08, 2020.
- Chapter 4 (Process Information) – Class ¹1 Modification, approved on September 08, 2020.
- Appendix 4A, Section 1 (Phase I Critical Systems Design Report) – Class ¹1 Modification, approved on September 08, 2020.
- Appendix 4A, Section 3 (Critical Systems Design Drawings) – Class ¹1 Modification, approved on September 08, 2020.

The Permittees submitted Drawing 19, H-2-830854, Sheet 4, Revision 2 in Appendix 4A, Section 3. Drawing 19, H-2-830854, Sheet 4 is identified as Revision 1 on the PCN Form. Ecology updated Appendix 4A, Section 3 with Drawing 19, H-2-830854, Sheet 4, Revision 2.

- Appendix 4D (Construction Specifications) – Class ¹1 Modification, approved on September 08, 2020.
- Appendix C9 (Integrated Disposal Facility Infrastructure Construction Specification) – Class ¹1 Modification, approved on September 08, 2020.

Part V Unit-Specific Conditions for Units Undergoing Closure:

PUREX Storage Tunnels, Closure Unit Group 25

PCN-PUREX-2019-03

- Unit-Specific Permit Conditions – Class ¹1 Modification, approved on July 23, 2020.
- Chapter 11 (Closure and Financial Assurance) – Class ¹1 Modification, approved on July 23, 2020.

276-BA Organic Storage Area, Closure Unit Group 32

PCN-276-BA-2020-01


- Part I Standard and Part II General Facility Conditions – Class ¹1 Modification, approved on August 27, 2020.
- Unit-Specific Permit Conditions and Addendum H (Closure Plan) – Class ¹1 Modification, approved on August 27, 2020.

USDOE and CH2M Hill Plateau Remediation Company agreed to Ecology removing the 276-BA Organic Storage Area unit information from Permit Attachment 9 (Permit Applicability Matrix) as noted on the approved PCN Form. Ecology updated Permit Attachment 9 in the Site-wide Permit.

This permit modification removes the 276-BA Organic Storage Area Closure Unit Group 32 from the Site-wide Permit.

If there are any questions regarding this letter, please contact Jennifer Lisa Cantu, Site-wide Permit Quarterly Lead, at jennifer.cantu@ecy.wa.gov or (509) 318-5949.

Sincerely,

 Digitally signed
by Schleif,
Stephanie (ECY)

Stephanie Schleif
Deputy Program Manager
Nuclear Waste Program

jc/ag
Enclosure

Reference: Letter 20-ESQ-0106, dated October 7, 2020, “Class 1 Modifications to the Hanford Facility Resource Conservation and Recovery Act Permit, Quarter Ending September 30, 2020”

cc: See page 5

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
Sheila Davis, BNI
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
Sheila Davis, BNI
Brittany Sparks, BNI
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
John Martell, WDOH
John Wiesman, WDOH
Randy Treadwell, WSDA
Allyson Brooks, WSDAHP

Cindy Preston, WSDNR
NWP RIM Coordinators, Ecology
BNI Correspondence Control
CHPRC Correspondence Control
Environmental Portal
Gonzaga University Foley Center Library
Hanford Administrative Record,
Hanford Site-wide Permit
Hanford Facility Operating Record
MSA Correspondence Control
PNNL Correspondence Control
Portland State University Library,
Government Information
University of Washington Suzzallo Library,
Government Publications
USDOE-ORP Correspondence Control
USDOE-RL Correspondence Control
USDOE Public Reading Room, CIC
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
NWP Central File

cc w/enc, hard copy:

NWP Library: Hanford Site-wide Permit