



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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October 28, 2021

21-NWP-182

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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, 2021 (8C.2021.Q3)

Reference: Letter 21-ECD-003166, dated October 05, 2021, "Class 1 Modifications to the Hanford Facility Resource Conservation and Recovery Act Permit, Quarter Ending September 30, 2021"

Dear Addressees:

The Department of Ecology (Ecology) reviewed the United States Department of Energy's (USDOE) letter and enclosures (Reference). Ecology confirms that we approved the Class 1¹ Modifications and concurred with the Class 1 Modifications listed in the referenced letter in the quarter ending September 30, 2021. Ecology incorporated the modifications into the Site-wide Permit.

Ecology also incorporated non-enforceable changes to portions of the Site-wide Permit provided by the Permittees according to Permit Condition II.A.4a. The non-enforceable changes that were incorporated within this quarter are documented in Ecology's letter.

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 ¹1 Modifications and concurred with the Class 1 Modifications in the quarter ending September 30, 2021:

Permit Attachments:

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

PCN-4A-2021-03

Permit Attachment 4A "Building Emergency Directors/Building Wardens" – Class 1 Modification, concurred with on September 9, 2021.

Part I and Part II:

Part I Standard and Part II General Facility Conditions

PCN-HFSW-2021-02

- "Part I Standard and Part II General Facility Conditions" – Class 1 Modification, concurred with on September 15, 2021.

PCN-HFSW-2021-01

- "Part I Standard and Part II General Facility Conditions" – Class ¹1 Modification, approved on July 21, 2021.

Part III Unit-Specific Conditions for Final Status Operations:

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

PCN-LERF/ETF-2021-03

- “Unit-Specific Permit Conditions” – Class ¹ Modification, approved on September 9, 2021.

Modifications to the LERF/ETF “Unit-Specific Permit Conditions” are slightly different from what was submitted by the Permittees within the Permit Change Notice (PCN) request. These changes are the result of overlapping permit modifications and crossover of PCNs, and do not impact the resulting permit text.

242-A Evaporator, Operating Unit Group 4

PCN-242-A-2021-02

- “Unit-Specific Permit Conditions” – Class ¹ Modification, approved on August 26, 2021.

Modifications to the 242-A Evaporator “Unit-Specific Permit Conditions” are slightly different from what was submitted by the Permittees within the Permit Change Notice (PCN) request. These changes are the result of overlapping permit modifications and crossover of PCNs, and do not impact the resulting permit text.

PCN-242-A-2021-03

- Chapter 4 “Process Information” – Class 1 Modification, concurred with on July 13, 2021.

325 Hazardous Waste Treatment Units, Operating Unit Group 5

PCN-325-2021-01

- “Unit-Specific Permit Conditions,” – Class 1 Modification, concurred with on September 15, 2021.
- Addendum J, “Contingency Plan” – Class 1 Modification, concurred with on September 15, 2021.

Waste Treatment and Immobilization Plant (WTP), Operating Unit Group 10

24590-HLW-PCN-ENV-20-002

- Appendix 10.6 “High-Level Waste Building Mechanical Drawings” – Class ¹ Modification, approved on September 21, 2021.

24590-BOF-PCN-ENV-20-001

- “Unit-Specific Permit Conditions,” Chapter 4G “Direct-Feed Low-Activity Waste (Effluent Management Facility)” – Class ¹ Modification, approved on September 8, 2021.

24590-WTP-PCN-ENV-20-004

- Chapter 4 “Process Information,” Chapter 4G “Direct-Feed Low-Activity Waste (Effluent Management Facility),” Appendix 9.2 “Low-Activity Waste Building Piping and Instrumentation Diagrams,” and Appendix 13.2 “Balance of Facilities Piping and Instrument Diagrams” – Class ¹ Modification, approved on September 1, 2021.

24590-WTP-PCN-ENV-20-003

- “Unit-Specific Permit Conditions” – Class ¹1 Modification, approved on August 23, 2021.

24590-BOF-PCN-ENV-20-002

- “Unit-Specific Permit Conditions,” Chapter 1 “Part A Form,” Chapter 4I “Balance of Facilities,” Appendix 1.5 “WTP Interim Compliance Schedule WTP High-Level Waste Facility,” and Appendix 12.4 “Balance of Facilities General Arrangement Drawings” – Class ¹1 Modification, approved on August 3, 2021.

24590-LAW-PCN-ENV-20-004

- Appendix 9.1 “Low-Activity Waste Process Flow Diagrams,” Appendix 9.2 “Low-Activity Waste Building Piping and Instrumentation Diagrams,” and Appendix 9.6 “Low-Activity Waste Building Mechanical Drawings” – Class ¹1 Modification, approved on August 3, 2021.

24590-LAB-PCN-ENV-20-001

- “Unit-Specific Permit Conditions,” and Chapter 4H “Analytical Laboratory” – Class ¹1 Modification, approved on July 27, 2021.

24590-HLW-PCN-ENV-20-0004

- Appendix 10.2 “High-Level Waste (HLW) Building Piping & Instrumentation Diagrams (P&ID)” and Appendix 10.4 “High-Level Waste Building General Arrangement Drawings” – Class ¹1 Modification, approved on July 13, 2021.

Integrated Disposal Facility, Operating Unit Group 11

PCN-IDF-2021-01

- Chapter 4A3, “Critical Systems Design Drawings” – Class ¹1 Modification, approved on August 26, 2021.

Waste Encapsulation and Storage Facility, Operating Unit Group 14

PCN-WESF-2021-02

- Addendum A, “Part A Form” and Attachment A, “Photographs & Topographic Map” – Class 1 Modification, concurred with on August 24, 2021.
- Addendum G, “Personnel Training” – Class 1 Modification, concurred with on August 24, 2021.

Ecology modified Addendum G, Table G-1, Footnote d as the Permittees requested which is described on the approved PCN-WESF-2021-02 Hanford Facility RCRA Permit Modification Notification Form. This change was not submitted in the Addendum G document enclosed with the formal PCN-WESF-2021-02 submittal.

Part V Unit-Specific Conditions for Units Undergoing Closure:

Waste Encapsulation and Storage Facility Hot Cells A through F, Closure Unit Group 6

PCN-WESF-2021-02

- Addendum A, “Part A Form” and Attachment A, “Photographs & Topographic Map” – Class 1 Modification, concurred with on August 24, 2021.

Ecology incorporated the following non-enforceable changes in the quarter ending September 30, 2021:

Permit Attachments:

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

NEC-4A-2021-03

Ecology received USDOE’s Letter 21-ECD-002879 dated September 21, 2021, submitting non-enforceable changes to Permit Attachment 4A “Building Emergency Directors/Building Wardens”. Ecology agrees that these specific changes to Permit Attachment 4A are non-enforceable changes to the Site-wide Permit. Ecology incorporated the non-enforceable changes in Permit Attachment 4A on September 28, 2021 and updated the Site-wide Permit within this quarter.

NEC-4A-2021-02

Ecology received USDOE’s Letter 21-ECD-002087 dated July 2, 2021, submitting non-enforceable changes to Permit Attachment 4A “Building Emergency Directors/Building Wardens”. Ecology agrees that these specific changes to Permit Attachment 4A are non-enforceable changes to the Site-wide Permit. Ecology incorporated the non-enforceable changes in Permit Attachment 4A on August 5, 2021 and updated the Site-wide Permit within this quarter.

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,



Stephanie Schleif
Deputy Program Manager
Nuclear Waste Program

jc/ag
Enclosure

cc: See page 6

cc electronic w/o enc:

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Wes Boyd, USDOE
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Portland State University Library,
Government Information
University of Washington Suzzallo Library,
Government Publications
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Environmental Portal
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Hanford Site-wide Permit
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 Correspondence Control
WRPS Correspondence Control

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