FACT SHEET

Proposed Permit Renewal 9A.2026.1D, of the *Hanford Facility Resource Conservation and Recovery Act Permit, Dangerous Waste Portion, Revision 9A, for the Treatment, Storage, and Disposal of Dangerous Waste,* WA7890008967

This page intentionally left blank.

FACT SHEET
9A.2026.1D

TABLE OF CONTENTS

1.0 Facility Overview and History 11
1.1 Hanford Background 11
1.2 Washington State Department of Ecology Authority 12
1.3 Hanford Site-wide Permit Organization 13
1.4 Permit Criteria 13
2.0 Proposed Revisions To The Hanford Site-Wide Permit, Revision 9a Renewal 13
2.1 Overview and Background 13
2.1.1 Permitting background 13
2.1.2 Interim Status 14
2.1.3 Operable Units 14
2.1.4 Path forward to a Revised Renewal 15
2.1.5 Conceptual Agreement Package Guidance Development 15
2.1.6 Color-coded Process for Permit Files 16
2.1.7 Major Themes 17
2.2 Development of the Hanford Site-wide Permit, Rev. 9A Renewal 17
2.2.1 Unit-Group Workshops 17
2.2.2 Completed Draft Revision 9A Permit files that were updated in Revision 8C Permit Modifications 19
2.2.3 Permit Modifications Not Reflected in the draft Hanford Site-wide Permit, Revision 9A 20
2.2.4 Unit Groups that were Closed Out of Hanford Site-wide Permit, Revision 8C that were included in the draft Revision 9A Permit Renewal 20
2.2.5 Hanford Site-wide Permit, Revision 8C Unit Groups that are New to the draft Revision 9A Permit Renewal 20
2.2.6 Unit Groups New to the Renewal 21
2.2.7 Denial 21
2.2.8 Waivers 22
2.2.9 Variance 22
2.2.10 Exemption 23

2.2.11 Reserved Documents 23
2.2.12 Shared Permit Documents 23
2.2.13 Engineering Drawings and Documents 23
2.2.14 Supporting Documentation 23
2.2.15 Administrative Record 24
2.3 Tiered Process for Elevation of Issues 24
2.3.1 Working Principles and roles of the United States Department of Energy, Ecology, and Environmental Protection Agency 24
3.0 Unit Groups and Addenda In The Permit 26
3.1 Unit Groups 26
3.2 List of Addenda 26
3.2.1 Corrective Action Unit Groups 29
3.3 Conceptual Agreement Package Guidance Summary 30
3.3.1 Addendum A – Part A Form 30
3.3.2 Addendum B – Waste Analysis Plan 30
3.3.3 Addendum C – Process Information 31
3.3.4 Addendum D – Groundwater Monitoring 31
3.3.5 Addendum E – Security 33
3.3.6 Addendum F – Preparedness and Prevention 33
3.3.7 Addendum G – Personnel Training 34
3.3.8 Addendum H – Closure Plan 34
3.3.9 Addendum I – Inspection 37
3.3.10 Addendum J – Contingency Plan 38
3.3.11 Addendum K - Post-Closure Plan 39
3.4 Focus Group Decisions 39
3.4.1 Compliance Schedules 40
3.4.2 Risk Budget Tool 40
3.4.3 Off-Site Transportation 41
3.4.4 Omnibus 41
3.4.5 Management of Radioactive and Mixed Waste 41
3.4.6 References to the Tri-Party Agreement 43
3.4.7 Washington v Chu Consent Decree 44
3.5 Additional Decisions for the Renewal 44

3.5.1 Certification of Documents 44
3.5.2 Cover Design 44
3.5.3 Transfer of Owner and Co-Operator 45
3.5.4 Standard Permit Conditions 45
3.5.5 Permit Attachment Revisions 76
3.5.6 Environmental Protection Agency Recommendations and Public Comment Responses 77
4.0 Procedures for Reaching a Final Decision on the Draft Permit Modification 77
4.1 Public Hearings 78
4.2 Hanford Public Information Repositories and Administrative Records 78
5.0 State Environmental Protection Act Determination 79
6.0 References 79

TABLES

Table 3-1 List of Operating, Closure and Post-Closure Unit Groups and Associated Addenda ... 25
Table 3-2 Parts I and II Condition Changes 46
Table 3-3 Permit Condition Crosswalk 65

ACRONYMS

AEA	*Atomic Energy Act of 1954*
AGO	Washington State Attorney General Office
ALARA	As Low As Reasonably Achievable
AOP	Air Operating Permit
BEP	Building Emergency Plan
CAFO	Consent Agreement/Final Order
CAP	Conceptual Agreement Package
CERCLA	Comprehensive Environmental Response, Compensation and Liability Act
CFR	Code of Federal Regulations
CIS	Capsule Interim Storage
CUG	Closure Unit Group
CWC	Central Waste Complex
DOT	U.S. Department of Transportation
DST	Double-Shell Tank
DWMU	Dangerous Waste Management Unit
Ecology	Washington State Department of Ecology
EPA	U.S. Environmental Protection Agency Region 10
FRP	Facility Response Plan
GTF	Grout Treatment Facility
GWMP	groundwater monitoring plan
HFFACO	Hanford Federal Facility Agreement and Consent Order
HLVIT	high-level waste vitrification
HWTR	Hazardous Waste and Toxics Reduction
HWTU	Hazardous Waste Treatment Units
IDF	Integrated Disposal Facility
IQRPE	Independent Qualified Registered Professional Engineer
LAWPS	Low-Activity Waste Pretreatment System
LDR	Land Disposal Restriction
LERF/ETF	Liquid Effluent Retention Facility and 200 Area Effluent Treatment Facility
LLBG	Low-Level Burial Grounds
MTCA	Model Toxics Control Act
NEPA	National Environmental Policy Act

NRC	U.S. Nuclear Regulatory Commission
NRDWL	Nonradioactive Dangerous Waste Landfill
NWP	Nuclear Waste Program
OUG	Operating Unit Group
PCUG	Post-Closure Unit Group
PPMT	Permit Project Management Team
PUREX	Plutonium Uranium Extraction Facility
QAPjP	Quality Assurance Project Plan
RBT	Risk Budget Tool
RCRA	Resource Conservation and Recovery Act
ROD	Record of Decision
SEPA	State Environmental Policy Act
SST	Single-Shell Tank
SSW	secondary solid waste
TSD	Treatment, Storage, and Disposal
TPA	Tri-Party Agreement
TW CPS	Tank Waste Closure Performance Standard
U.S.C.	United States Code
USDOE	U.S. Department of Energy, Hanford Field Office
WAC	Washington Administrative Code
WAP	Waste Analysis Plan
WESF	Waste Encapsulation and Storage Facility
WMA	Waste Management Area
WMU	Waste Management Units
WRAP	Waste Receiving and Processing Facility
WTP	Waste Treatment and Immobilization Plant

FACT SHEET

Proposed Permit Renewal 9A.2026.1D, of the *Hanford Facility Resource Conservation and Recovery Act Permit, Dangerous Waste Portion, for the Treatment, Storage, and Disposal of Dangerous Waste (Hanford Site-wide Permit)*, Revision 9A, WA7890008967

PERMITTEES

The Hanford Site-wide Permit is issued to Hanford's owner and co-operators. U.S. Department of Energy, Hanford Field Office (USDOE), as the owner and operator of the facility, and Hanford contractors as co-operators, are the Permittees.

United States Department of Energy
Hanford Field Office
(Owner/Operator)
P.O. Box 550, MSIN: H6-60
Richland, WA 99352

Pacific Northwest National Laboratory
(Co-operator)
P.O. Box 999, MSIN: K1-46
Richland, WA 99352

Bechtel National, Inc.
(Co-operator)
450 Hills St, MSIN: H4-02
Richland, WA 99354

Hanford Mission Integration Solutions
P.O. Box 943
Richland, WA 99354

Hanford Tank Waste Operations & Closure, LLC (Co-operator)
P.O. Box 850, MSIN: H3-21
Richland, WA 99352

Hanford Laboratory Management and Integration, LLC (Co-operator)
P.O. Box 1796
Richland, WA 99352

Central Plateau Cleanup Company, LLC
(Co-operator)
P.O. Box 1464
Richland, WA 99352

The Washington State Department of Ecology (Ecology) is announcing its draft permit renewal for dangerous waste management at the USDOE Hanford Facility. Ecology will make a final decision on this permit after receiving and evaluating public comments.

Ecology developed this Hanford Site-wide Permit, Revision (Rev.) 9A renewal (Rev. 9A Permit) Fact Sheet in accordance with the requirements of Washington Administrative Code (WAC) 173-303-840(2)(f). Its purpose is to discuss the proposed draft permit renewal to the Hanford Site-wide Permit. This Rev. 9A Permit Fact Sheet describes the decisions that have been made since 2012 to prepare a revised draft renewal. It also describes the permit conditions, attachments, and unit groups included in the draft Rev. 9A Permit renewal. Unit Groups in the Rev. 9A Permit are individual treatment, storage and disposal facilities that make up the entire Hanford Site-wide Permit. The treatment, storage and disposal facilities are identified in the Hanford Federal Facility Agreement and Consent Order (HFFACO), also known as the Tri-Party

Agreement (TPA) in Appendix B. (More information is included in Section 1.1.) The unit groups are also known as “chapters” in the Rev. 9A Permit.

Each unit group has its own fact sheet that provides more detail of the treatment, storage, and disposal (TSD) facility, the decisions that have been made since the 2012 draft Hanford Site-wide Permit, Rev. 9 renewal (Rev. 9 Permit) and the proposed changes within the unit group.

All draft permits must be accompanied by a fact sheet that is supported by administrative record and made available for public comment in accordance with WAC 173-303-840(2)(e). This fact sheet is supported by the Ecology Nuclear Waste Program (NWP) Administrative Record for the Rev. 9A Permit renewal.

This proposed draft permit renewal will update the Hanford Site-wide Permit, Revision 8C (Rev. 8C Permit).

Within the fact sheet, there are several acronyms listed. Each acronym is spelled out the first time. For more information on the full list of acronyms in the permit, reference the acronyms list at the beginning of the fact sheet.

1.0 FACILITY OVERVIEW AND HISTORY

1.1 Hanford Background

The United States government established the Hanford Site in 1943 during World War II to produce plutonium for nuclear weapons. It was part of the original Manhattan Project.

The Hanford Site, located in south-central Washington State, covers 586 square miles, and encompasses 50 miles of the Columbia River. It is divided into specific areas as follows:

- The 100 Area, situated along the shore of the Columbia River in the northern portion of the Site, is the location of nine nuclear reactors. The irradiated fuel produced in the 100 Area reactors was transported by rail to the 200 Areas.
- The 200 East and 200 West Areas are located on a plateau south of the Columbia River. These areas housed facilities that separated plutonium from dissolved irradiated fuel. Wastes were neutralized and stored in large underground tanks. In addition, various wastes were discharged to cribs and surface ponds for evaporation and percolation into the ground.
- The 300 Area, located just north of Richland, was the location of nuclear fuel fabrication and research and development activities. The fabricated fuel slugs were shipped by rail from the 300 Area to the nuclear reactors in the 100 Area.
- The 400 Area is located northwest of the 300 Area. It is the location of the Fast Flux Test Facility, a 400-megawatt thermal, liquid-metal (sodium) cooled nuclear research and test reactor owned by the USDOE. The facility, which operated for about ten years, has been shut down since 1993 and deactivated.

Plutonium production at Hanford continued through the Cold War and ended in 1989. The production of plutonium resulted in thousands of waste sites from the direct disposal of millions of gallons of wastewater, disposal of solid waste in miles of trenches and buildings that

need to be decontaminated and decommissioned, and 56 million gallons of radioactive and chemical waste in 177 underground tanks.

In 1989, the USDOE, Ecology, and the U.S. Environmental Protection Agency Region 10 (EPA) (also known as the Tri-Party Agencies) signed a landmark agreement called the HFFACO also known as the TPA to clean up the Hanford Site and commit to protection of the environment.

Milestones were developed to support the Resource Conservation and Recovery Act (RCRA) and Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) cleanup. The Hanford Site-wide Permit application material was originally submitted through TPA milestones. Not all the facilities and Dangerous Waste Management Units (DWMUs) were included in the first Hanford Site-wide Permit. As new facilities are included, the Hanford Site-wide Permit continues to be revised. History of revisions to the Hanford Site-wide Permit is included in the Part I and II Conditions.

1.2 Washington State Department of Ecology Authority

State authorization is a rulemaking process where EPA authorizes states to administer and enforce a state hazardous waste management program under Section 3006 of RCRA, 42 United States Code (U.S.C.) Section 6926 in lieu of EPA. Washington State is authorized by EPA to administer and enforce the Washington State Hazardous Waste Management Act, Chapter 70A.300 Revised Code of Washington (RCW), through State Dangerous Waste Regulations, Chapter WAC 173-303, as amended. Ecology is the state agency responsible for administering and enforcing these laws and regulations under which any action taken shall have the same effect as action taken by EPA under RCRA. EPA has an office in Seattle that is responsible for RCRA that maintains oversight of Washington State's authorization. In addition, EPA has an office in Richland that implements CERCLA at Hanford as identified in the TPA.

The state's authorized program must be at least as stringent as the federal program, and in some cases is broader in scope and more stringent than the federal program. Ecology works closely with EPA on regulatory issues and decisions through agreements made between the agencies from our state's authorization.

Ecology regulates the following under the Dangerous Waste Regulations in WAC 173-303 and the State Hazardous Waste Management Act:

- Dangerous Waste.
- Dangerous Waste Components of Mixed Waste.

The requirements of this permit are separate but accompanied by a complex landscape of regulatory systems that apply to various activities at Hanford, including but not limited to:

- **CERCLA.** EPA is the lead regulatory agency for CERCLA cleanup requirements at Hanford.
- ***Atomic Energy Act of 1954*** **(AEA). USDOE** has authority to regulate waste that is solely radioactive, radioactive materials, and radioactive waste under the AEA.
- **US Ecology**. Disposes commercial low-level waste. US Ecology is a permitted commercial company that leases property within Hanford's central plateau.

- **Clean Air Act.** A separate Hanford Air Operating Permit (AOP) regulates toxic air emissions. This air permit covers mainly diesel engines and stack emissions.
- **Clean Water Act.** Separate wastewater discharge permits are managed outside the Hanford Site-wide Permit.

1.3 Hanford Site-wide Permit Organization

The Hanford Site-wide Permit is organized into 50 dangerous waste TSD unit groups and two Corrective Action unit groups, with Standard Permit Conditions and Attachments. The Rev. 9 Permit has changed from 37 unit groups to 52 unit groups and the content within this fact sheet will provide an explanation of the history.

1.4 Permit Criteria

Revisions to the Hanford Site-wide Permit must meet the permitting criteria listed below. Once proposed revisions are completed, Ecology will have a dangerous waste permit that is:

- **Equivalent** – Ensures compliance with the Dangerous Waste Regulations, WAC 173-303, and protection of human health and the environment.
- **Consistent** – Applies regulations consistently throughout the permit and across Washington State through its authorization to manage dangerous waste under WAC 173-303.
- **Enforceable** – Provides clear and specific requirements in the permit conditions.
- **Implementable** – Ensures permit requirements reflect facility conditions and permitted activities.

2.0 PROPOSED REVISIONS TO THE HANFORD SITE-WIDE PERMIT, REVISION 9A RENEWAL

2.1 Overview and Background

2.1.1 Permitting background

Ecology issued the initial dangerous waste permit for the Hanford Facility in 1994. The Hanford Facility has been operating under the initial Hanford Site-wide Permit since that date and has been modified several times to incorporate changes or updates and to add and delete several unit groups. The current Hanford Site-wide Permit is under Rev. 8C. Under WAC 173-303-806(11)(a), final facility permits will be effective for a fixed term not to exceed ten years.

The 1994 permit was in two parts, one from Ecology and one from the EPA, because the state had not received full authority for state regulations to operate in place of the federal regulations.

In 2005, Washington State received authority from EPA for the remaining components needed to issue a dangerous waste permit on its own. Under 40 Code of Federal Regulations (CFR) 271.19, EPA retains oversight.

Dangerous waste regulations require Ecology to reissue a permit after a term of up to 10 years. Ecology issued the first permit for a 10-year term in 1994. The USDOE submitted a permit application on March 30, 2004, for renewal (USDOE letter, 04-OES-0046). Ecology reviewed the

draft permit application and transmitted a response to the Permittees' permit renewal application on September 1, 2004. It served as Ecology's completeness determination, and therefore Hanford continued to operate under the existing permit in accordance with WAC 173-303-806(7)(a). From 2004-2011, Ecology with the Permittees worked to address deficiencies not submitted in the original permit renewal application. Following workshops with the Permittees, Ecology began preparing documents for the draft renewal, Rev. 9 Permit, from 2011-2012.

On May 1, 2012, Ecology proposed the draft Rev. 9 Permit, as a reissuance of the existing Rev. 8C Permit, and began a public comment period that extended past the required 45-days under WAC 173-303-840. The public comment period was planned for 120 days to allow enough time for members of the public and Tribal Nations to review the draft Rev. 9 Permit and provide comments. The public comment period was extended by 54 days to allow the public additional time to review the draft Rev. 9 Permit renewal. The draft Rev. 9 Permit was comprised of 37 separate unit groups and 2 Corrective Action unit groups covering many dangerous waste activities on the Hanford Site. Ecology held public hearings in Richland, Washington; Seattle, Washington; Portland, Oregon; and Hood River, Oregon during the public comment period.

The Single-Shell Tanks Unit Group was available for public review beginning June 28, 2012 and was scheduled to end September 30, 2012. Public hearings were held in Richland, Washington and Seattle, Washington. The draft Rev. 9 Permit renewal incorporated all the dangerous waste TSD unit groups that were previously in final status or in interim status. While the work on the renewal continued, the Rev. 8C Permit continued to be the final status permit for the Permittees.

During the public comment period, over 5,000 comments were received from members of the public, Tribal Nations, and the Permittees.

Ecology also worked with EPA to address input and recommendations. Ecology developed agreements called Conceptual Agreements to incorporate recommendations from EPA.

Since 2012, Ecology has worked with the Permittees on preparing the draft Rev. 9A Permit.

2.1.2 Interim Status

Federal law allows federal facilities to operate under "interim status" standards if they existed before becoming subject to the dangerous waste regulations. This was the case with Hanford, which started operating in 1944. Interim status allows a facility to operate while completing the permitting process. Hanford operated under interim status since the 1980s until Ecology and EPA issued the first permit in 1994. Some of the unit groups in the current Rev. 8C Permit are required to follow interim status requirements. Once the draft Rev. 9A Permit is issued and effective, all unit groups will be incorporated into the permit.

2.1.3 Operable Units

An operable unit is defined in the TPA as follows, "An operable unit at Hanford is a group of land disposal sites placed together for the purposes of doing a Remedial Investigation/ Feasibility Study (RI/FS) and subsequent cleanup actions. The primary criteria for placement of

a site into an operable unit includes geographic proximity, similarity of waste characteristics and site type, and the possibility for economies of scale."

2.1.4 Path forward to a Revised Renewal

Following the 2012 draft Rev. 9 Permit public comment period, the result was a determination that portions of the draft permit would require revision and the Permittees would not be required to submit a completely new permit application.

To prepare for the revised draft Rev. 9A Permit, Ecology developed Conceptual Agreement Packages (CAP) guidance, incorporating EPA input and recommendations for each portion of the permit application. The CAP guidance documents are based on the Dangerous Waste Regulations (WAC 173-303), Dangerous Waste Permit Application Requirements for Facilities that Store and/or Treat Dangerous Wastes in Tank Systems and/or Containers, (Ecology Permit Application Guidance 95-402),[1] as well as additional guidance or regulatory documents, as Ecology deemed appropriate. Ecology staff identified supplemental information that was needed for each addendum in each of the unit groups. Major Theme Agreements were developed in response to multiple deficiencies in the draft permit renewal that required the Permittees and Ecology to work together to identify a solution. Major Themes were discussed and agreed to with the Permittees to identify the best path forward to applying the dangerous waste regulations and Ecology guidance to Hanford.

Ecology developed CAPs and Major Theme Agreements between May 2013-September 2022. Ecology and the Permittees held CAP workshops on each unit group for each addendum from 2015-2025.

Since 2012, the Permittees submitted supplemental information for the revision to the permit renewal. Ecology provided acceptance letters to the Permittees in response to the certified supplemental information that was submitted. Certified submittals were provided to Ecology according to WAC 173-303-810(13). Although this is a revised renewal, the draft permit documents are not in redline/strikeout. Instead, each unit group fact sheet includes information on the revisions proposed since 2012.

2.1.5 Conceptual Agreement Package Guidance Development

Ecology's NWP staff created Hanford-specific guidance, the CAPs, as a basis for consistency and equivalency reviews of unit group addenda. The CAP guidance provides Ecology's NWP, EPA, and Ecology's Hazardous Waste and Toxics Reduction (HWTR) program staff assurance that these addenda meet requirements and standards. The CAPs are based on dangerous waste regulations WAC 173-303 and Ecology Permit Application Guidance 95-402. In addition, the CAPs addressed Hanford-specific needs while folding in applicable Conceptual Agreements and comments received during the public comment period. CAP guidance was prepared for each portion of a Part A and B permit application. The CAP guidance was reviewed by EPA, Ecology HWTR program, and the Washington State Attorney General's Office (AGO) prior to presenting

[1] https:/apps.ecology.wa.gov/publications/publications/95402.pdf

and transmitting the document to the Permittees by formal letter and initiating unit group workshops. The CAP guidance development has resulted in:

1. Workshops in which Ecology's NWP staff and Permittee staff reviewed all addenda.
2. Identification and recording of deficiencies from each unit group.
3. Resolutions developed for deficiencies to be incorporated as revisions in permit documents.
4. Changes and documents were identified in a color-coded system (red, yellow, or green files, see definition below) depending on the level of modifications needed.
5. Major/common issues that were identified and addressed in the proposed permit renewal revision.
6. A consistent approach to permit application submittals and the revised draft Rev. 9A Permit for each unit group.
7. A finalized Response to Comments document that responds to public comments and communicates whether comments were incorporated into the final, draft Rev. 9A Permit.
8. A final draft Rev. 9A permit renewal that incorporates the permit criteria outlined in Section 1.4, requirements in the dangerous waste regulations, and is consistent with Ecology Permit Application guidance 95-402.

2.1.6 Color-coded Process for Permit Files

The following section describes the process that was followed for organizing all permit files. Within the process, permit files were evaluated to determine the complexity of changes that needed to be made. Each permit file received a color code to assist Ecology and the Permittees to complete revised permit files for the draft Rev. 9A Permit. The color-coded system was developed to identify and prioritize addenda for each unit group based on the number of revisions and type of issues to be addressed. Additionally, the system helped to identify universal changes for addenda requiring management guidance for communicating and resolving issues with the Permittees.

The following reflects the color-coded system and the definition of each color:

Green file: Minor changes, no permit document certification required.

Yellow file: Supplemental information was provided by the Permittees to address deficiencies. Files are certified by the Permittees. Ecology responded to the certified submittal by sending a letter either accepting or rejecting the certified submittal.

Red file: Substantial changes to an existing file or a new permit document submittal was required. Files were certified by the Permittees. Ecology responded to the certified submittal by sending a letter either accepting or rejecting the certified submittal.

All permit documents were organized and managed through Ecology's configuration control process.

2.1.7 Major Themes

Ecology reviewed the draft Rev. 9 Permit deficiencies to find "Major Themes," which are defined as recurring deficiencies across more than 50 percent of the draft Rev. 9 Permit unit groups. Major Themes were developed for the Part A and B portions of the draft Rev. 9 Permit after the CAP Deficiency Matrices were completed.

Major Themes were shared with the Permittees. Major Themes for each of the Part A and B portions of the draft Rev. 9 Permit were addressed and resolved in workshops that included Ecology staff, representatives from the Permittees and EPA. The Major Theme Agreements were incorporated into the CAP Deficiency Matrices and communicated within Ecology and transmitted to the Permittees.

CAP Deficiency Matrices and the Major Theme Agreements provided guidance and structure to Ecology and the Permittees as they worked through issues and deficiencies in workshops (see section 2.2.1 for more detail on workshops). The result was final redline/strikeout draft permit documents in support of the draft Rev. 9A Permit. Each unit group has its own file set of draft permit documents that resulted from CAP guidance reviews, Major Theme discussions and workshops.

2.2 Development of the Hanford Site-wide Permit, Rev. 9A Renewal

Ecology worked with the Permittees to review supplemental information for existing draft Rev. 9 Permit documents and new documents to prepare the draft Rev. 9A Permit.

Ecology staff committed to working with the Permittees to address deficiencies in the 2012 draft Rev. 9 Permit renewal.

2.2.1 Unit-Group Workshops

Ecology and the Permittees met in unit group workshops to discuss the deficiencies from the Hanford Site-wide Permit, 2012 draft Rev. 9 Permit renewal. The workshops were a collaborative process between the Permittees and Ecology to discuss permit deficiencies and draft supplemental information that would be added to Addenda. Workshops were held for each addendum required for unit groups. Ecology and the Permittees agreed on the starting file for each of the addenda. Starting files were either the 2012 Rev. 9 Permit document, a new document, or the Rev. 8C Permit document if it had more current and complete information. Reference Table 3-1 for the starting file list for each unit group addenda.

Using CAP guidance documents for addenda and the Major Theme Agreements, Ecology documented deficiencies in CAP Matrices against the draft Rev. 9 Permit from 2012. Ecology would initially meet with the Permittees at a "Needs Meeting" where Ecology presented a deficiency matrix for the specific unit group's addenda and answered questions. Following the Needs Meeting, Ecology and the Permittees scheduled and met in workshops to discuss the deficiencies documented in CAP Deficiency Matrices. Unit group workshops were conducted to address specific deficiencies, public and Tribal Nation comments, and proposed permit document changes. The result of the workshops was an agreement on how the Permittees would meet Ecology's requests for supplemental information for specific addenda, to write permit conditions and address comments made during the 2012 draft Rev. 9 Permit renewal.

In unit group workshops, Ecology and the Permittees worked to get to resolution of issues if they arose. Ecology and the Permittees agreed to work together and complete "Two Good Tries" to get to agreement on an issue. "Two Good Tries" were initiated when unit group workshops began. The Permittees and Ecology intended to make a good faith effort to resolve issues at each level in the process. If there was no resolution in workshops, then Ecology and the Permittees agreed to elevate issues for resolution. Once it was decided that the issue would be elevated, then Ecology and the Permittees developed a joint issue statement and worked through the issue resolution process described in more detail in Section 2.3.

By the end of the workshops, Ecology or the Permittees developed and agreed to a redline/strikeout version of the draft permit files. This was known as a "frozen file." The phase "frozen" was created to ensure all files are kept secure through Ecology's Configuration Control of the permit. Frozen files could be requested again if there were revisions needed due to a new issue or decisions that arose in future workshops.

In some cases, new documents were created for the draft Rev. 9A Permit renewal if there were too many changes to the original addendum or an addendum was not included for a unit group in the 2012 draft Rev. 9 Permit. For more information on the types of permit documents, see Section 2.1.5.

2.2.1.1 Permit Production of Revision 9A Files

The Permittees submit the "frozen file" to Ecology certified and by formal letter. As described in Section 2.1.5, yellow and red files were submitted to Ecology certified. The certified file would be reviewed by the Ecology project team to ensure all agreed to language and supplemental information were included. If Ecology agreed to the certified submittal, the addendum would be considered the "locked down" version in Ecology's configuration control process. The phase "locked down" was created to ensure all files are kept secure. The locked down version is defined as files that Ecology has verified that the certified file is the same as the frozen file. These files are ready for permit production in support of the draft Rev. 9A Permit renewal.

Each unit group workshop resulted in a revised draft Rev. 9A Permit addendum and additions to unit group permit conditions. All certified submittals to Ecology and acceptance letters from Ecology are included in Ecology's Administrative Record. Although the Rev. 9A Permit documents are not shown in redline/strikeout, those versions are also available in Ecology's Administrative Record.

2.2.1.2 Revisions to Permittee Certified Submittals (Tier 1 Agreement)

Tier 1 representatives agreed on the following circumstances in which certified or locked down documents would be revised by Ecology:

- After receiving the certified submittal to Ecology, if the document does not include the agreed-to changes or supplemental information from unit group workshops, Ecology will include the changes. The changes will be shared with the Permittees and then locked down again.

- After receiving the certified submittal to Ecology, if the document does not include information because of agreed-to or a disagreement from Tier 1 or 2, Ecology will include the changes. The changes will be shared with the Permittees and then locked down again.
- If new information comes to light for a specific unit group (for example: new or altered training requirements or, unit specific compliance resolutions), then Ecology or the Permittees can revise a locked down document. The changes will be agreed to, documented, and shared with the Permittees then locked down again or shared as an issue.
- If a template changes and Ecology and the Permittees agree to proceed with modifying an addendum in a specific unit group, then the addendum can be revised either by the Permittees or Ecology, as appropriate. The changes would be shared between agencies and then locked down again.
- If documents are locked down and Major Theme Agreements are made that affect a specific addendum that is locked down, then Ecology can make the revisions to ensure consistency with the Major Themes. The changes would be shared with the Permittees and locked down again.
- Closer to the transmittal of the draft Rev. 9A Permit revised renewal, Ecology will review the approved Rev. 8C permit modifications to determine if they need to be integrated into the final Rev. 9A Permit.
- Closer to the transmittal of the draft Rev. 9A Permit renewal, Ecology will review the Rev. 9A Permit documents to update any references to Parts I and II Conditions, Attachments, or references to other unit groups, as appropriate.
- If there are additional circumstances in which Ecology or the Permittees would need to modify locked down documents, then those would be agreed to and documented at the unit group level (or identified as an issue) and then brought to Tier 1 for discussion and an agreement or disagreement is documented.

2.2.2 Completed Draft Revision 9A Permit files that were updated in Revision 8C Permit Modifications

For some unit groups, renewal work required for Rev. 9A was completed through Rev. 8C permit modifications. Public comments made within Rev. 8C permit modifications received responses at the time of permit modification issuance and final permit decision. Documentation of the responses to comments made during permit modifications is included in the draft Rev. 9A Permit renewal file set. The unit groups that have completed their draft Rev. 9A Permit renewal work in the Rev. 8C Permit copied their files into the draft Rev. 9A Permit renewal file set. Additional updates were made to these permit documents by Ecology to include references to Part I and II Conditions and Attachments prior to the Rev 9A public comment period.

2.2.3 Permit Modifications Not Reflected in the draft Hanford Site-wide Permit, Revision 9A

Additionally, for unit groups that are currently in the Rev. 8C Permit and therefore not being added to the permit for the first time during the renewal, there may be permit modifications that are not reflected in the draft Rev. 9A Permit renewal because they were completed after the lockdown of documents. The list of permit modifications that are not reflected in the draft Rev. 9A Permit renewal are included in an attachment to the transmittal letter.

2.2.4 Unit Groups that were Closed Out of Hanford Site-wide Permit, Revision 8C that were included in the draft Revision 9 Permit Renewal

Since the 2012 renewal, several unit groups closed and were removed from the Rev. 8C Permit. Responses to comments for the following unit groups are included with Rev. 9A. The list of unit groups and the date on which they were closed out of the permit are included below:

- 331-C Storage Unit, Operating Unit Group (OUG)-15 (site closed in 2011, removed from Rev. 8C Permit in 2016).
- 1301-N Liquid Waste Disposal Facility, Closure Unit Group (CUG)-2 (removed from Rev. 8C Permit in 2018).
- 600 Area Purgewater Storage and Treatment Facility, (CUG-8) (removed from Rev. 8C Permit in 2018).
- 207-A South Retention Basin, (CUG-9) (removed from Rev. 8C Permit in 2017).
- 1706-KE Waste Treatment System Facility, (CUG-16) (removed from Rev. 8C Permit in 2018).
- 1325-N Liquid Waste Disposal Facility Post-closure Unit Group (PCUG)-3 (removed from Rev. 8C Permit in 2017).
- 1324-N Impoundment & 1324 NA Percolation Pond (PCUG-4) (removed from Rev. 8C Permit in 2017).
- FS-1 Outdoor Container Storage Area Closure (CUG-4) (a DWMU in the Solid Waste Operations Complex) (removed from Rev. 8C Permit in 2016).
- 276-BA Storage Area (CUG-9) (removed from Rev. 8C Permit in 2020).

2.2.5 Hanford Site-wide Permit, Revision 8C Unit Groups that are New to the draft Revision 9A Permit Renewal

Unit groups that were added to Rev. 8C Permit and are now included in the draft Rev. 9A Permit are included below:

- Low-Activity Waste Pretreatment System (LAWPS) (OUG-1) (incorporated in the Rev. 8C Permit in 2021).
- Waste Encapsulation and Storage Facility (WESF)(OUG-14) (incorporated in the Rev. 8C Permit in 2020).
- Capsule Interim Storage (CIS) (OUG-19) (incorporated in the Rev. 8C Permit in 2020).
- WESF Hot Cells A through F (CUG-6) (incorporated in the Rev. 8C Permit in 2016).

- Plutonium Uranium Extraction Facility (PUREX) Tunnels (CUG-25) (incorporated in the Rev. 8C Permit in 2019, included in the PUREX CUG-25).
- PUREX Tanks TK-P4 and TK-40 (CUG-33) (incorporated in the Rev. 8C Permit in 2021, included in PUREX CUG-25).
- Solid Waste Operations Complex CUGs: 277-T Building (Non-Consent Agreement/Final Order (CAFO)) (CUG-27), 271-T Cage (CAFO)(CUG-29), 2401-W Waste Storage Building (CUG-39), 277-T Outdoor Storage Area (CUG-28), 211-T Pad (CUG-30), 221-T Sand Filter Pad, and 221-T Railroad Cut (Non-CAFO) (CUG-42) (incorporated in the Hanford Site-wide Permit, Rev. 8C in 2023).
  Note: PCN-221T-SFP-2024-01, the 221-T Sand Filter Pad was closed and removed from the Hanford Site-wide Permit, Rev. 8C. References to the unit group within the permit remain because documents were locked down prior to its removal from the permit. However, this unit group is not included in the file set of the draft Rev. 9A Permit renewal.
- Central Waste Complex (CWC) Outdoor Storage Area-A (CUG-34) (incorporated in the Rev. 8C Permit in 2026).

2.2.6 Unit Groups New to the Renewal

Unit Groups that are new to the draft Rev. 9A Permit, were not in the draft Rev. 9 Permit and are not currently in the Hanford Site-wide Permit, Rev. 8C are included below:

- 271-T Cage (CAFO) (CUG-29).
- 211-T Pad (CAFO) (CUG-30).
- 324 Building (CUG-31).
- CWC Outdoor Storage Area-B (CUG-35).
- CWC D-10 Non-CAFO (CUG-36).
- 221-T R5 Waste Storage Area CAFO (CUG-38).
- 2706-TB Tank System (CUG-40).
- 221-T Pipe Gallery (CUG-42).
- 221-T Tank System (CUG-43).
- Double-Shell Tank (DST) 241-AY-102 (CUG-45).
- 221-T Cell 11-L (CUG-46).
- 325 High-Level Vault Tanks (CUG-48).

2.2.7 Denial

The Grout Treatment Facility (GTF) CUG-23, included in the draft Rev. 9 Permit in 2012 is being denied in the draft Rev. 9A Permit.

Within the Rev. 9 GTF unit-specific Fact Sheet, it said,[2]

[2] https://fortress.wa.gov/ecy/nwp/permitting/hdwp/Rev/9/CU/grout_treatment.html

In 2009, Ecology and EPA considered two other options for closure of the GTF. The options were based on (*sic*) the approaches described in "Procedures for Decision Making" in Washington Administrative Code (WAC) 173-303-840(2). The two options were:

1. Prepare a draft permit with a closure plan according to WAC 173-303-840(2)(b).
2. Deny the permit application according to WAC 173-303-840(2)(c).

Permit application denial was considered the most efficient approach for the GTF. WAC 173-303-840(2)(c) describes this approach as follows: "If the department tentatively decides to deny the permit application, then the department will issue a notice of intent to deny. A notice of intent to deny the permit application is a type of draft permit which follows the same procedures as any draft permit prepared under this subsection. If the department's final decision is that the tentative decision to deny was incorrect, then the department will withdraw the notice of intent to deny and proceed to prepare a draft permit under this subsection."

Ecology informed the USDOE of this decision on August 18, 2009. The USDOE concurred with the decision in a letter dated September 25, 2009 (09-ESQ-506).

The public had the opportunity to comment on this decision during the Hanford Site-wide Permit Renewal public comment period in 2012. Ecology consulted with EPA on the path forward and met with the Permittees. Collectively, it was decided that the GTF would be denied by Ecology sending a letter to the USDOE. The denial of the GTF is included in this transmittal letter for the draft Rev. 9A Permit and is on file in Ecology's Administrative Record.

2.2.8 Waivers

Requests for waivers from the WAC 173-303-806 requirements to provide an addendum were submitted for several unit groups, which are listed in Table 3-1 of this fact sheet. The Permittees requested waivers by formal letter and Ecology responded by either accepting or rejecting the waiver, which is documented in the unit group Administrative Record. Waivers are included in the file set of the unit group. The specifics of the request for a waiver are included in each unit group fact sheet.

2.2.9 Variance

In 2017, the Permittees submitted a petition for a site-specific Land Disposal Restriction (LDR) treatment variance for Hanford tank waste as directed under 40 CFR 268.44(h) (17-ECD-0050 REISSUE). This variance would specify high-level waste vitrification (HLVIT) as the method of treatment for Hanford tank waste processed through the Waste Treatment and Immobilization Plant (WTP) for all applicable waste codes. In 2019, Ecology approved that request (19-NWP-165).

2.2.10 Exemption

Under WAC 173-303-645, the Permittees requested an exemption for the Low-Level Burial Ground (LLBG) Trench 94 from the groundwater monitoring requirements under WAC 173-303-645(1)(b)(iv). Ecology accepted the exemption in an acceptance letter (23-NWP-156). The letter and USDOE document are incorporated into the unit group file set. For more information, reference the LLLBG Trench 94 fact sheet.

2.2.11 Reserved Documents

Within the draft Rev. 9A Permit, there are portions that are marked "reserved." The label "reserved" may mean that the document may have been included in the permit at one time and was closed out or removed from the permit. For example, the Rev. 8C Permit, Attachment 7 was removed from the draft Rev. 9A Permit renewal and is marked "reserved." Another definition of "reserved" may be defined as an addendum or document that is "exempt" or not required (see Table 3-1 for unit groups and addenda below). For some unit groups, not all the addenda are required because the requirements are met in another addendum. In a CUG, for example, the dangerous waste permitting requirements are included in the Closure Plan. Finally, "reserved" may mean there is information that will be submitted in the future, and there is a placeholder for the permit language.

2.2.12 Shared Permit Documents

Some unit groups share permit documents. For example, the Waste Encapsulation Storage Facility shares a Part A with the Waste Encapsulation Storage Facility Hot Cells A through F. The reason for sharing files between unit groups is that the requirements for each unit group are met in one document. Table 3-1 includes information on which unit groups share permit documents.

2.2.13 Engineering Drawings and Documents

Ecology required that the Permittees provide engineering drawings and documents for unit groups, as appropriate. These permitted documents are included in an appendix for the unit group. Permitted engineering drawings and documents are provided for public review. Those documents that include Confidential Business Information or are marked Official Use Only are on file and managed separately by Ecology's library staff in accordance with the Washington State Public Records Act and Ecology's Nuclear Waste Program's Policy, *Dealing with National Security Sensitive Materials at the Hanford Site*.

In some cases, the Permittees did not certify those engineering drawings and documents that are legacy and/or historical in nature. In these instances, Ecology accepted the engineering drawings and documents into Ecology's Administrative Record. Where this occurred, it is noted and within the Process Information Addendum or included as an appendix.

2.2.14 Supporting Documentation

Ecology received supporting documentation during unit group workshops to provide Ecology staff with additional information in support of their review. Some of the supporting documentation includes procedures, inspections, Independent Qualified Registered

Professional Engineer (IQRPE) reports, engineering drawings and documents, and decision letters. The supporting documentation received by Ecology during workshops is included in Ecology's Administrative Record.

In addition, letters sent by the Permittees to provide certified submittals of supplemental information for the draft Rev. 9A Permit renewal, and acceptance letters by Ecology for those submittals, are also filed in Ecology's Administrative Record.

2.2.15 Administrative Record

Ecology staff completed an Administrative Record folder for each Addendum in each unit group in the draft Rev. 9A Permit. The Administrative Record files are in Ecology's Administrative Record. An overall draft Rev. 9A Permit Administrative Record is also on file in Ecology's Administrative Record that includes development of the CAPs and Major Themes, resolution of issues, and responses to comments from the Rev. 9 Permit renewal.

2.3 Tiered Process for Elevation of Issues

2.3.1 Working Principles and roles of the United States Department of Energy, Ecology, and Environmental Protection Agency

The USDOE and Ecology, with support and oversight from EPA, are committed to continuous improvement and to the safe and effective cleanup of the Hanford Site in accordance with applicable regulatory requirements. The Working Principles document affirms the intent of the USDOE, Ecology, and EPA to work collaboratively and act consistently. It also outlines the issue elevation process. It formed the Rev. 9 elevation process in which issues and decisions would be made at the Tier 1 and Tier 2 levels. Tier 1 and Tier 2 levels were made up of representatives from DOE-Office of River Protection, DOE-Richland Operations Office and Ecology. Although EPA sits on both the Tier 1 and Tier 2 groups, EPA does so as a non-lead regulatory agency. EPA is not a decision-maker on the Tier 1 and Tier 2 groups but rather provides support and oversight to Ecology with respect to its authorized dangerous waste program.

In addition, the Working Principles document includes information on the identification and resolution of issues. The document says, "Consistent with HFFACO Action Plan Section 6.2 and Agreement Article VIII of the HFFACO, all disputes between Ecology and DOE-Office of River Protection or DOE-Richland Operations Office regarding any Ecology disapproval, proposed modification, decision or determination made pursuant to Part Two of the HFFACO will be conducted according to HFFACO Article VIII provisions." The intent of including the issue resolution process in the Working Principles document, as described in this fact sheet, is to provide opportunities for the USDOE and Ecology to make a final decision on permit documents.

Key elements of the Working Principles document include an approach based on the mutual goals of issuing a complete, legally defensible, and implementable permit within a defined time frame to support and authorize Hanford cleanup and waste management activities. Additional elements include:

- A commitment to good-faith engagement in the permitting process.
- Open and effective communication.

- Early identification and elevation of issues.
- Providing required permit application material.
- A clear and transparent process for timely resolution of issues.
- Use of a project management approach.
- Streamlining of regulatory processes and the production of regulatory documents.

Ecology, EPA, and the Permittees used the Working Principles document as a guide to accelerate development and approval of the draft Rev. 9A Permit to facilitate Ecology's publication of a draft permit for public comment.

2.3.1.1 Permit Project Management Team

The first level in the issue resolution process is the Permit Project Management Team (PPMT) meeting. This group, comprised of Permittee and Ecology staff, met regularly to discuss permit schedules, Rev. 9A Addenda status, and issues as they were elevated from the unit group workshops. Unit group workshop issues were presented to the PPMT after Ecology and the Permittees completed "Two Good Tries" as described in Section 2.2.1 to get to resolution. An issue statement was agreed to by Ecology and the Permittees and sent to PPMT attendees. PPMT attendees discussed the issue and provided recommendations to help Ecology and the Permittees. If the issue could not get to resolution, then specific Ecology and Permittee staff that are designated as Tier 1 members, decided whether the issue could go to the next tier for resolution, which is Tier 1.

2.3.1.2 Tier 1

Tier 1 members included an Ecology representative (this included the NWP Deputy Program Manager or the Dangerous Waste Permitting Project Manager throughout the duration of revised permit renewal preparation), two USDOE representatives (this included USDOE Environmental managers, once identified under USDOE-Office of River Protection and USDOE-Richland Operations Office), and a representative from EPA (Region 10 RCRA Senior Policy Advisor). EPA did not provide input to the final decision; however, they advised Ecology in the discussion and final decision.

The issues that could come to resolution at PPMT were then elevated to Tier 1 to resolve disagreements in a prompt manner. An issue paper was written and presented by Ecology and the Permittees to Tier 1. Tier 1 representatives provided recommendations to help bring the issue to resolution in the meeting. If the issue could be resolved in the meeting, then Tier 1 representatives made a final decision. If there was agreement in Tier 1, it was documented, signed and communicated to the Ecology and Permittees. If the issue was not resolved at Tier 1, it was then elevated to Tier 2. Tier 1 representatives wrote their issue paper and provided it to Tier 2 for discussion and a decision.

Tier 1 issues and agreements are listed in Appendix 1.0.

2.3.1.3 Tier 2

Tier 2 members included an Ecology representative (this included the NWP Program Manager and NWP Deputy Program Manager throughout the duration of the revised permit renewal

preparation), two USDOE representatives (this included members of USDOE management, once identified under USDOE-Office of River Protection and USDOE Richland Operations Office), and a representative from EPA (Director of EPA Region 10 Office). EPA did not provide input to the final decision; however, they advised Ecology in the discussion and final decision.

The issues that could not come to resolution at Tier 1 were then elevated to Tier 2 to resolve disagreements in a prompt manner. In rare cases, some issues were elevated straight to Tier 2. An issue paper was written and presented by Ecology and the Permittees to Tier 2 representatives. Tier 2 representatives provided recommendations to help bring the issue to resolution in the meeting. If the issue could not be resolved in the meeting, then Tier 2 representatives made a final decision. If there is agreement in Tier 2, it was documented and communicated to the Ecology and Permittees. If the issue was not resolved at Tier 2, the disagreement is documented, and Ecology proceeded with writing the permit according to their position. The Permittees have the right to provide comments on the final decision made during the Rev. 9A Renewal public comment period.

Tier 1 and 2 issues and agreements are listed in Appendix 1.0.

3.0 UNIT GROUPS AND ADDENDA IN THE PERMIT

3.1 Unit Groups

The following includes the unit groups in the draft Rev. 9A Permit and general information on the guidance provided to Ecology and the Permittees.

3.2 List of Addenda

The draft Rev. 9A Permit includes the addenda that is listed below. Table 3-1 lists the unit groups, and which Addenda are included in each unit group.

Addendum A	Part A Form
Addendum B	Waste Analysis Plan (WAP)
Addendum C	Process Information
Addendum D	Groundwater Monitoring Plan (GWMP)
Addendum E	Security
Addendum F	Preparedness and Prevention (P&P)
Addendum G	Personnel Training Plan
Addendum H	Closure Plan
Addendum I	Inspection Plan
Addendum J	Contingency Plan
Addendum K	Post-Closure Plan

Table 3-1 List of Operating, Closure and Post-Closure Unit Groups and Associated Addenda

REV 9A Unit Groups	A	B	C	D	E	F	G	H	I	J	K
Part III - OUGs											
LAWPS (OUG-1)	**Gr**	**Gr**	**Gr**	R	**Gr**	**Gr**	**Gr**	**Gr**	**Gr**	**Gr**	R
Liquid Effluent Retention Facility and 200 Area Effluent Treatment Facility (LERF & ETF) (OUG-3)	**Red**	**Y**	**Y**	**Gr**	**Red**	**Gr**	**Red**	**Y**	**Y**	**Gr**	R
242-A Evaporator (OUG-4)	**Red**	**Y**	**Y**	R	**Red**	**Gr**	**Red**	**Y**	**Y**	**Red**	R
325 Hazardous Waste Treatment Units (HWTU) (OUG-5)	**Red**	**Red**	**Red**	R	**Red**	**Gr**	**Red**	**Y**	**Y**	**Red**	R
CWC (OUG-6)	**Red**	**Red**	**Red**	R	**Red**	**Red**	**Red**	**Red**	**Y**	**Red**	R
222-S Laboratory Complex (OUG-8)	**Red**	**Red**	**Red**	R	**Y**	**Red**	**Red**	**Red**	**Y**	**Red**	R
T-Plant Complex (OUG-9)	**Red**	**Red**	**Red**	R	**Red**	**Y**	**Red**	**Red**	**Y**	**Red**	R
WTP (OUG-10)	**Red**[1]	**Gr**[1]	**Gr**[1]	R	**Gr**[1]	**Gr**[1]	**Y**[1]	**Gr**[1]	**Y**[1]	**Red**[1]	R
Integrated Disposal Facility (IDF) (OUG-11)	**Gr**	**Y**	**Y**	**Red**	**Y**	**Gr**	**Red**	**Y**	**Y**	**Red**	**Red**
DST System & 204-AR Waste Unloading Station (OUG-12)	**Red**	**Red**	**Red**	R	**Gr**	**Gr**	**Red**	**Red**	**Red**	**Red**	R
WESF (OUG-14)	**Gr**	**Gr**	**Gr**	R	**Gr**	**Gr**	**Gr**	**Gr**	**Gr**	**Gr**	R
LLBG Trenches 31 and 34 (OUG-17)	**Red**	**Red**	**Red**	**Red**	**Red**	**Y**	**Red**	**Red**	**Y**	**Red**	R
LLBG Trench 94 (OUG-18)	X[2]	X[2]	**Red**	E	X[2]	X[2]	X[2]	X[2]	X[2]	X[2]	R
CIS (OUG-19)	**Gr**	**Gr**	**Gr**	R	**Gr**	**Gr**	**Gr**	**Gr**	**Gr**	**Gr**	R
Part V -CUGs											
Single-Shell Tank (SST) System (CUG-4)	Red	R	Red	Red	Red	Red	Red	Red	Red	Red	Red
WESF Hot Cells A through F (CUG-6)	X[3]	R	R	R	R	R	R	**Gr**	R	R	R
216-A-29 Ditch (CUG-11)	**Red**	R	R	**Red**	W	W	W	**Red**	W	**Red**	R
216-A-36B Crib (CUG-12)	**Red**	R	R	**Red**	W	W	W	**Red**	W	**Red**	R
216-A-37-1 Crib (CUG-13)	**Red**	R	R	**Red**	W	W	W	**Red**	W	**Red**	R
216-S-10 Pond & Ditch (CUG-14)	**Red**	R	R	**Red**	W	W	W	**Red**	W	**Red**	R
241-CX Tank System (CUG-15)	**Red**	R	R	R	**Red**	W	**Red**	**Red**	**Red**	**Red**	R

Table 3-1 List of Operating, Closure and Post-Closure Unit Groups and Associated Addenda

REV 9A Unit Groups	A	B	C	D	E	F	G	H	I	J	K
Hexone Storage and Treatment Facility (CUG-19)	**Red**	R	R	R	**Red**	W	**Red**	**Red**	**Red**	**Red**	R
Nonradioactive Dangerous Waste Landfill (NRDWL) (CUG-20)	**Red**	R	R	**Red**	**Red**	**Red**	**Red**	**Red**	**Red**	**Red**	R
216-B-63 Trench (CUG-21)	**Red**	R	R	**Red**	W	W	W	**Red**	W	**Red**	R
216-B-3 Main Pond (CUG-22)	**Red**	R	R	**Red**	W	W	W	**Red**	W	**Red**	R
B-Plant Complex (CUG-24)	**Red**	R	**Red**	R	**Red**	W	**Red**	**Red**	**Red**	**Red**	R
PUREX (CUG-25)	**Red**	R	**Red**	R	**Red**	W	**Red**	**Red**	**Red**	**Red**	R
LLBG Green Islands (CUG-26)	**Red**	R	R	**Red**	**Red**	**Red**	**Red**	**Red**	**Red**	**Red**	R
277-T Building (CUG-27)	R	R	R	R	R	R	R	**Red**	R	R	R
277-T Outdoor Storage Area (CUG-28)	R	R	R	R	R	R	R	**Red**	R	R	R
271-T Cage (CUG-29)	R	R	R	R	R	R	R	**Y**	R	R	R
211-T Pad (CUG-30)	R	R	R	R	R	R	R	**Red**	R	R	R
324 Building (CUG-31)	**Red**	R	R	R	R	R	R	**Red**	R	R	R
PUREX Tanks (TK-P4 and TK-40) (CUG-33)	R	R	R	R	R	W	R	**Gr**	R	R	R
CWC Outdoor Storage Area-A (CUG-34)	R	R	R	R	R	R	R	**Red**	R	R	R
CWC Outdoor Storage Area-B (CUG-35)	R	R	R	R	R	R	R	**Red**	R	R	R
CWC: D-10 Outside Storage Area (CUG-36)	R	R	R	R	R	R	R	**Red**	R	R	R
221-T R5 Waste Storage Area CAFO (CUG-38)	R	R	R	R	R	R	R	**Red**	R	R	R
2401-W Waste Storage Building (CUG-39)	R	R	R	R	R	R	R	**Y**	R	R	R
2706-TB Tank System (CUG-40)	R	R	R	R	R	R	R	**Red**	R	R	R
221-T Railroad Cut (CUG-41)	R	R	R	R	R	R	R	**Y**	R	R	R
221-T Pipe Gallery (CUG-42)	R	R	R	R	R	R	R	**Red**	R	R	R
221-T Tank System (CUG-43)	R	R	R	R	R	R	R	**Red**	R	R	R
400 Area Waste Management Units (WMU) (CUG-44)	**Red**	R	R	R	**Red**	**Gr**	**Red**	**Red**	**Red**	**Red**	R

Table 3-1 List of Operating, Closure and Post-Closure Unit Groups and Associated Addenda

REV 9A Unit Groups	A	B	C	D	E	F	G	H	I	J	K
DST 241-AY-102 (CUG-45)	X[4]	X[4]	X[4]	R	X[4]	X[4]	X[4]	**Red**	X[4]	X[4]	R
221-T Cell 11-L (CUG-46)	R	R	R	R	R	R	R	**Red**	R	R	R
Waste Receiving and Processing Facility (WRAP) (CUG-47)	R	R	R	R	X[5]	X[5]	X[5]	**Red**	X[5]	**Red**	R
325 High-Level Vault (HLV) Tanks (CUG-48)	R	R	R	R	R	R	R	**Red**	R	R	R
Part VI - PCUG Groups											
300 Area Process Trenches (PCUG-1)	**Red**	R	R	**Gr**	R	R	R	R	R	R	**Y**
183-H Solar Evaporation Basis (PCUG-2)	**Red**	R	R	**Gr**	R	R	R	R	R	R	**Red**

Gr = Included in the draft Rev 9A Permit that is designated as Green per Section 2.1.5.

Y = Included in the draft Rev 9A Permit that is designated as Yellow per Section 2.1.5.

Red = Included in the draft Rev 9A Permit that is designated as Red per Section 2.1.5.

Gr[1], Y[1], and Red[1] = The WTP Unit Group has Chapters, not Addenda.

X[2] = This unit group shares this Addendum with LLBG Trenches 31 and 34 (OUG-17).

X[3] = This unit group shares this Addendum with WESF (OUG-14).

X[4] = This unit group shares this Addendum with DST (OUG-12).

X[5] = This unit group shares this Addendum with CWC (OUG-6).

E = Exempt from providing this Addendum and shown as "reserved" in the unit group file set.

R = Reserved for possible future submission to the permit.

W = A waiver has been issued by Ecology.

3.2.1 Corrective Action Unit Groups

The Hanford Site-wide Permit, Rev. 9A has two Corrective Action Unit Groups under Part IV: Waste Management Corrective Action Unit Group (CA-1) and Groundwater Operable Unit (CA-2). Each unit group includes a fact sheet and permit conditions. Both unit groups were included in the Hanford Site-wide Permit, Rev. 9 and were updated for the Hanford Site-wide Permit, Rev. 9A Renewal. For additional information on the unit groups, see each unit group technical fact sheet.

3.3 Conceptual Agreement Package Guidance Summary

The following represents introductory information included in the CAP Guidance for each of the addenda required in a permit application under WAC 173-303. The full CAP Guidance and Major Theme Agreement list are on file in Ecology's Administrative Record and available for public review.

The CAP guidance includes a checklist for each addendum in which each of the permit application requirements are detailed, as well as requirements for Ecology Permit Application Guidance 95-402. In some of the CAPs, there are additional federal or state guidance documents and references, as appropriate.

3.3.1 Addendum A – Part A Form

Requirements for submittal of a Part A Form for a permit application are listed in WAC 173-303-803. Consistent with Ecology's authorization to manage Washington State Dangerous Waste, the Ecology's NWP includes the entire Part A permit application form in the issued permit. For clarity, the Part A form for the Hanford Facility is divided into multiple forms that correspond to the individual unit groups. Those forms are included in the Permit as Addendum A, "Part A Form".

Unit groups are administrative groupings of one or more DWMUs. Collectively, the individual unit group Part A forms constitute the Hanford Facility Part A form.

Table 3-1 identifies unit groups that have included an Addendum A. Other addenda within the unit group may reference information within their Addendum A. Some unit groups include unit specific permit conditions for the associated Addendum A.

3.3.1.1 Differences in the Part A Forms for the Hanford Site-wide Permit

- The USDOE is both the owner and co-operator, and contracts with different companies for operation of the facility. Entries for the owner/operator sections of the Part A form had to be tailored to allow for entering the USDOE as the owner/operator, and the other contractors as "co-operators."
- There is only one topographic map for each unit group, which is intended to satisfy both WAC 173-303-803(3)(l) Part A and WAC 173-303-806(4)(a)(xviii) Part B topographic map requirements. As a result, Ecology included both sets of Part A WAC requirements.

3.3.2 Addendum B – Waste Analysis Plan

Waste analysis requirements are applicable for DWMUs that store, treat, and dispose of dangerous waste. The regulatory requirement is that a facility owner/operator is required to confirm their knowledge and obtain a detailed chemical, physical, and/or biological analysis about dangerous waste before they store, treat, or dispose of it, per WAC 173-303-300. Additionally, WAC 173-303-806 requirements were also included in the list of regulations for submittal of information in support of this addendum. This information will be used to:

- Safely manage the waste through proper operations and process control.

- Identify applicable LDR treatability subgroups, where information in addition to dangerous waste numbers is needed to identify underlying hazardous constituents, and to verify compliance with LDR requirements in WAC 173-303-140. For example, the total concentration of mercury might be necessary to establish some treatment standards.
- Inform closure actions and decisions.

Table 3-1 identifies unit groups that have included an Addendum B, "Waste Analysis Plan" within their permit. Other addenda within the unit group may reference information within their Addendum B. Each unit group includes permit conditions specific to Addendum B. If a unit group does not require Addendum B, information equivalent to a Waste Analysis Plan for closure purposes is included in their Addendum H, "Closure Plan."

Permit Condition II.D, Waste Analysis, and Permit Condition II.O, Land Disposal Restrictions include waste analysis requirements.

DWMUs that are prohibited from receiving additional waste may not need an Addendum B for purposes of waste acceptance. However, for purposes of continued waste TSD, or to inform closure actions/decisions, a Waste Analysis Plan may still be necessary.

3.3.3 Addendum C – Process Information

Requirements for submittal of an Addendum C, "Process Information" are in WAC 173-303-806(4). Additional requirements for each type of DWMU are included in WAC 173-303-630 through -680 Process Information addenda provides detailed information on the operation of the facility, including equipment lists, procedures, and descriptions of each DWMU. The addenda provide information on how the unit group treats, storages and disposes of dangerous waste within the facility. Table 3-1 identifies unit groups that have included an Addendum C. Other addenda within the unit group may reference information or requirements within their Addendum C. Each unit group includes permit conditions specific to Addendum C. If a unit group does not require an Addendum C, information equivalent to process information for closure purposes is included in their Addendum H. Ecology required some CUGs to submit an Addendum C to describe how the unit group will manage waste within the facility.

3.3.4 Addendum D – Groundwater Monitoring

The groundwater monitoring requirements are included in WAC 173-303-645. Additionally, WAC 173-303-806 requirements were also included in the list of regulations for submittal of information in support of this addendum. The USDOE and Ecology created a template for Addendum D, "Groundwater Monitoring Plan" to ensure all dangerous waste requirements are met and that permit information is communicated consistently. The groundwater monitoring requirements for DWMUs in operating, closure, and post-closure unit groups are also contained in the following permit conditions and addenda:

- Permit Condition II.F Groundwater and Vadose Zone Monitoring and Corrective Action for Regulated Units.
- Unit-Specific Permit conditions specific to groundwater monitoring in each applicable Operating (Part III), Closure (Part V) and Post-Closure (Part VI) unit group.

- Addendum D, "Groundwater Monitoring Plan" [located in Operating (Part III), Closing (Part V), and Post-Closure (Part VI) unit groups].

The following OUGs are regulated units which contain either landfills or surface impoundments. They are required to follow the groundwater monitoring requirements as specified in WAC 173-303-645(1)(a)(ii).

- OUGs:
  - LERF four surface impoundments (OUG-3).
  - IDF (OUG-11).
  - LLBG Trenches 31 and 34 (OUG-17).

The following CUGs except the SST CUG are either landfills or surface impoundments. They are required to comply with groundwater monitoring requirements in WAC 173-303-645. Ecology has chosen to require groundwater monitoring of the SST CUG as a regulated unit, under the omnibus authority of WAC 173-303-815(2)(b)(ii). For more information see the SST Unit Group Fact Sheet.

- CUGs:
  - SST System [comprises seven Waste Management Areas (WMAs) in 200 East and West Areas] (CUG-4).
  - 216-A-29 Ditch (CUG-11).
  - 216-A-36B Crib (CUG-12).
  - 216-A-37-1 Crib (CUG-13).
  - 216-S-10 Pond & Ditch (CUG-14).
  - NRDWL (CUG-20).
  - 216-B-63 Trench (CUG-21).
  - 216-B-3 Main Pond (CUG-22).
  - LLBG Green Islands (comprises four WMAs in 200 East and West Areas) (CUG-26).

The following Post-Closure Unit Groups are either landfills or surface impoundments and require a GWMP in accordance with WAC 173-303-645(1)(a)(ii).

- PCUGs:
  - 300 Area Process Trenches Facility (PCUG-1).
  - 183-H Solar Evaporation Basins Facility (PCUG-2).

The LLBG Trench 94 requested an exemption from GWMP requirements under WAC 173-303-645.

3.3.5 Addendum E – Security

The security requirements for DWMUs in operating, closure, and post-closure unit groups are contained in WAC 173-303-310. Additionally, WAC 173-303-806 requirements were also included in the list of regulations for submittal of information in support of this addendum. Requirements are also included in the following locations within the draft Rev. 9A Permit:

- Permit Attachment 3, *Security*.
- Permit Condition II.L, Security.
- Unit-Specific Permit conditions specific to security in each applicable Operating (Part III), Closure (Part V), and Post-Closure (Part VI) unit groups.

Addendum E, "Security," located in Operating (Part III) and Closure (Part V) unit groups. The Security CAP is applicable to the Hanford Facility as a whole; to all operating DWMUs where TSD of dangerous/mixed waste occurs; and at DWMUs where TSD of dangerous/mixed waste has occurred, and security measures are still required.

If a unit group does not require Addendum E, information equivalent to security for closure and post-closure requirements is included in their Addendum H or Addendum K, "Post-Closure Plan". Some unit groups have requested a waiver for security requirements. For more information on waivers, see Section 2.2.7. To reference the unit groups that have requested waivers, see Table 3-1 in this fact sheet.

3.3.6 Addendum F – Preparedness and Prevention

The dangerous waste requirements for Preparedness and Prevention are included in WAC 173-303-350. Additionally, WAC 173-303-806 requirements were also included in the list of regulations for submittal of information in support of this addendum. Attachment 4, *Hanford Emergency Management Plan*, DOE/RL-94-02, details how the Hanford Facility complies with the Preparedness and Prevention and Contingency Plan requirements of WAC 173-303-340 and WAC 173-303-350. Each individual unit provides further detail in Addendum F, "Preparedness and Prevention" and Addendum J, "Contingency Plan" (i.e., Building Emergency Plans (BEPs) and Facility Response Plans (FRPs)).

The preparedness and prevention requirements for DWMUs in operating, closure, and post-closure unit groups are contained in the following permit conditions, addenda, and other permit documents:

- Permit Condition II.B, Preparedness and Prevention.
- Permit Attachment 4, *Hanford Emergency Management Plan* (DOE/RL-94-02).
- Addendum F, "Preparedness and Prevention" located in Operating (Part III), Closure (Part V), and Post-Closure (Part VI) unit groups.
- Addendum J "Contingency Plan" (Hanford BEPs or FRPs.)
- Unit-Specific Permit conditions specific to preparedness and prevention in each applicable Operating (Part III) and Closure (Part V) unit group.

The Permittees requested a waiver for Preparedness and Prevention requirements for some unit groups. For more information on waivers, see Section 2.2.7. To reference the unit groups that have requested waivers, see Table 3-1 in this fact sheet.

3.3.7 Addendum G – Personnel Training

The dangerous waste training requirements are located in WAC 173-303-330 that apply to personnel at the Hanford Facility. Additionally, WAC 173-303-806 requirements were also included in the list of regulations for submittal of information in support of this addendum. The Personnel Training addenda include information on the overall training program at the Hanford Site, as well as individual requirements for each unit group.

The training requirements for facility personnel are contained in the following locations in the draft Revision 9A Permit:

- Permit Condition II.C, Personnel Training.
- Unit-Specific Permit conditions specific to training in each applicable Operating (Part III), Closure (Part V), and Post-Closure (Part VI) unit group.
- Addendum G, "Personnel Training" located in Operating (Part III), Closure (Part V), and Post-Closure (Part VI) unit group permit chapters.
- Permit Attachment 5, *Hanford Facility Personnel Training Program*.

If a unit group does not require Addendum G, information equivalent to Personnel Training for closure and post-closure requirements is included in their Addendum H or Addendum K.

The Permittee requested a waiver for Personnel Training requirements for some unit groups. For more information on waivers, see Section 2.2.7. To reference the requested waivers, see Table 3-1 in this fact sheet.

3.3.8 Addendum H – Closure Plan

The closure requirements are included in WAC 173-303-610 and are applicable to the unit groups as described below. Additionally, WAC 173-303-806 requirements were also included in the list of regulations for submittal of information in support of this addendum. The closure requirements for DWMUs in operating and closure unit groups are also contained in the following permit conditions and addenda:

- Permit Condition II.H, Financial Assurance.
- Permit Condition II.J, Closure and Post-Closure.
- Permit conditions specific to closure in each Operating (Part III) and Closure (Part V) unit group.
- Addendum H, "Closure Plan" located in Operating (Part III) and Closure (Part V) unit groups.

3.3.8.1 Coordinated Closure

Unit Groups and past-practice units can be closely associated with each other and have identical cleanup goals, while at the same time have two separate regulatory required

documents in the Hanford Site-wide Permit, CERCLA Record of Decision (ROD) and two different cleanup schedules. In August 2019, the TPA agencies — The USDOE, Ecology, and the EPA — completed negotiations on revisions to the HFFACO, also referred to as the TPA. Those negotiations resulted in TPA updates to clarify how unit groups and past-practice units' interface with CERCLA actions (also known as Coordinated Closure).

Coordinated Closure is a procedure that was developed to coordinate the unit group closure and other applicable dangerous waste permitting activities with past-practice investigations and/or remediation activities. This coordination is necessary to prevent overlap and duplication of work, thereby addressing the contamination more economically and efficiently.

To coordinate the development and implementation of closure plans for such unit groups with the investigation and remediation of closely associated past-practice units, the Permittees will provide Ecology with the information necessary to satisfy any outstanding closure plan requirements under WAC 173-303-610(3) in the form of one or more Coordinated Closure Proposals.

Each Coordinated Closure Proposal will be submitted to Ecology as a permit modification request in accordance with WAC 173-303-830(4), I.C.1, and TPA Milestones M-037. It will be submitted in conjunction with the associated past-practice document(s) to the lead regulatory agency for the operable unit (see Section 2.1.3), pursuant to the applicable TPA milestone(s). The unit groups that will be closed through coordinated closure include references to the appropriate TPA milestones in unit group permit documents.

Post Closure Plan (Addendum K) content will be addressed through specific components of the Coordinated Closure Plans (in Addendum H). The unit groups under Coordinated Closure include:

- 241-CX.
- SST System.
- 216-S-10 Pond and Ditch.
- 216-A-37-1 Crib.
- 216-A-36B Crib.
- 216-B-3 Pond.
- 216-B-63 Trench.
- 216-A-29 Ditch.
- LLBG Green Islands.
- 324 Building.
- PUREX (Canyon and Tunnels).
- B Plant (221-B Canyon Facility).

3.3.8.2 Contingent Closure

DST 241-AY-102 CUG-45 will be closed according to Contingent Closure requirements WAC 173-303-640(8)(c).

If the Permittees demonstrates that not all contaminated soils can be practicably removed or decontaminated as required in clean closure, the tank must be closed as a landfill. This section describes contingent landfill closure actions for Tank 241-AY-102 prior to closure of 241-AY Tank Farm and the DST System. This section of the Tank 241-AY-102 Closure Plan for landfill closure actions will be implemented if USDOE and Ecology agree that clean closure is not practicable based on information provided in a practicability demonstration document. For more information, reference Addendum H Closure Plan in the 241-AY-102 CUG.

3.3.8.3 Development of Closure Performance Standards

Ecology worked with the Permittees on the development of Closure Performance Standards, specific to the draft Rev. 9A Permit unit groups.

The Permittees and Ecology worked together to develop a Tank Waste Closure Performance Standards (TW CPS) Table for tank waste constituents present in soil. The TW CPS Table was completed in support of the draft Rev. 9A Permit Closure Plan CAP guidance deficiency review.

The process to create the TW CPS Table involved a review of the regulatory requirements for closure, review of existing data on tank waste constituents, and review of potential pathways for contaminants to reach the environment and the toxicological data related to those contaminants.

The closure performance standard requirements codified in WAC 173-303-610(2) were reviewed when preparing the initial table. The WAC specifies the clean closure performance standards for soils, groundwater, surface water, and air are to be the cleanup levels using unrestricted use requirements and exposure assumptions, according to Model Toxics Control Act (MTCA), WAC 173-340-740. Primarily, these are numeric cleanup levels calculated according to MTCA Method B, WAC 173-340-700 through WAC 173-340-760, excluding WAC 173-340-745.

Analytical data on tank waste constituents were reviewed to create the initial table of constituents for consideration. The primary and secondary waste constituents identified on the TW CPS Table were taken from data in *Single-Shell Tank Component Closure Data Quality Objectives,* (RPP-23403, Rev. 6). The data and constituents, exposure pathway calculations, and references listed in the TW CPS Table were reviewed in multiple workshops by representatives of the Permittees and Ecology. The workshops were held until all comments provided by the Permittees were addressed.

The closure performance standard chosen, according to the dangerous waste regulations, is based on evaluation of the contaminant exposure pathway(s) and toxicological data and is usually the lowest identified value provided. The TW CPS Table also provides footnote explanations and references used in evaluating the choice of closure performance standards.

The TW CPS Table and associated guidance was transmitted to the Permittees in an Ecology letter 21-NWP 132. Letter 22-NWP-149 incorporated IDF as a tank waste unit group and was submitted to the Permittees. The TW CPS Table and associated guidance is included in applicable unit groups as an attachment to the unit group closure plan.

3.3.8.4 Sampling under Concrete

Ecology followed WAC 173-303-610 regulations and Ecology Publication 94-111 *Clean Closure Guidance* to establish requirements for sampling debris and sampling under concrete. The requirements were applied on a unit group basis.

3.3.8.5 Independent Qualified Registered Professional Engineer Certification Template for Closure Plans

A template was developed to help provide clarification as to the language within closure plans regarding IQRPE Certification prior to closure of a unit group in the Hanford Site-wide Permit.

3.3.9 Addendum I – Inspection

The inspection requirements are in the dangerous waste regulations WAC 173-303-320. Additionally, WAC 173-303-806 requirements were also included in the list of regulations for submittal of information in support of this addendum. The requirements for DWMUs in operating, closure, and post-closure unit groups are contained in the following permit conditions and addenda:

- Permit Condition II.X, Inspections.
- Unit-Specific Permit conditions specific to inspection requirements in Operating (Part III), Closure (Part V), and Post-Closure (Part VI) unit groups.
- Addendum I, “Inspection Plan” requirements located in Operating (Part III), Closure (Part V), and Post-Closure (Part VI) unit groups.
- Inspection requirements may be included directly in Addendum H “Closure Plan” or Addendum K “Post-Closure Plan” if the units are in Closure (Part V) or Post-Closure (Part VI).

3.3.9.1 Applicability of Inspection Requirements to Dangerous Waste Management Units

The CAP is applicable to all DWMUs subject to inspection requirements in the following regulations:

- WAC 173-303-320, *General inspection*.
- WAC 173-303-340, *Preparedness and prevention*.
- WAC 173-303-380, *Facility recordkeeping*.
- WAC 173-303-395, *Other general requirements*.
- WAC 173-303-630, *Use and management of containers*.
- WAC 173-303-640, *Tank systems*.
- WAC 173-303-650, *Surface impoundments*.
- WAC 173-303-665, *Landfills*.
- WAC 173-303-680, *Miscellaneous units*.
- WAC 173-303-690, *Air emission standards for process vents*.
- WAC 173-303-691, *Air emission standards for equipment leaks*.

- WAC 173-303-692, *Air emission standards for tanks, surface impoundments, and containers*.
- WAC 173-303-695, *Containment buildings*.

Requirements pertaining to land treatment, waste piles, incinerators, drip pads, and dangerous waste munitions and explosives storage are not addressed, as these types of DWMUs are not included in the Permit.

The CAP also provides guidance for the corresponding information per WAC 173-303-806 in Part B of the permit application, and that will be used as the basis for enforceable requirements of the Permit. WAC 173-303-806(4)(v) states that the Part B of a permit application must include a copy of the general inspection schedule required by WAC 173-303-320(2).

3.3.10 Addendum J – Contingency Plan

Contingency plan requirements are in the dangerous waste regulations under WAC 173-303-350. Additionally, WAC 173-303-806 requirements were also included in the list of regulations for submittal of information in support of this addendum. The draft Rev. 9A Permit renewal covers the legal requirements for the contingency plan in WAC 173-303-350 through the following site-wide permit sections:

- Permit Condition II.A, Facility Contingency Plan.
- Permit Attachment 4, *Hanford Emergency Management Plan* (DOE/RL-94-02).
- Permit Attachment 4A, *Building Emergency Directors/Building Wardens*
- Permit conditions specific to contingency plans in each Operating (Part III) and applicable Closure (Part V) unit groups. Reference Table 3-1 for the unit groups that have Contingency Plans.
- Addendum J, “Contingency Plan” located in Operating (Part III) and applicable Closure (Part V) unit groups.

The requirements of WAC 173-303-350 and WAC 173-303-360 are also met by the applicable sections of the facility specific BEPs and FRPs which are incorporated by reference into the permit.

3.3.10.1 Applicability of Contingency Requirements to Dangerous Waste Management Units

The CAP also provided guidance for the corresponding information that must be provided per WAC 173-303-806 in Part B of the permit application, and that will be used as the basis for enforceable requirements of the draft Rev. 9A Permit renewal.

3.3.10.2 The Hanford Emergency Management Plan

The *Hanford Emergency Management Plan* (DOE/RL-94-02) (Permit Attachment 4) incorporates into one document an overview of the Hanford Site emergency management program for the Permittees.

3.3.10.3 Building Emergency Directors/Building Wardens

A companion document to the Hanford Emergency Management Plan, Attachment 4A, *The Building Emergency Directors/Building Wardens* incorporates the list of Hanford Site building emergency directors and building wardens, their location and point of contact information.

3.3.11 Addendum K - Post-Closure Plan

The dangerous waste regulations for post-closure are included in WAC 173-303-610. Additionally, WAC 173-303-806 requirements were also included in the list of regulations for submittal of information in support of this addendum. Requirements for DWMUs in operating, closure, and post-closure unit groups are also contained in the following permit conditions and addenda:

- Permit Condition II.H, Financial Assurance.
- Permit Condition II.J, Closure and Post-Closure.
- Permit conditions specific to post-closure in each Operating (Part III), Closure (Part V), and Post-Closure (Part VI) unit group.
- Addendum K, "Post-Closure Plan" located in Operating (Part III), Closure (Part V), and Post-Closure (Part VI) unit group Permit chapters.

The CAP is applicable to DWMUs subject to post-closure requirements in the following regulations:

- WAC 173-303-610, *Closure and Post-closure*.
- WAC 173-303-640, *Tank systems*.
- WAC 173-303-645, *Releases from regulated units*.
- WAC 173-303-650, *Surface impoundments*.
- WAC 173-303-665, *Landfills*.
- WAC 173-303-680, *Miscellaneous units*.
- WAC 173-303-695, *Containment buildings*.

Requirements pertaining to land treatment, waste piles, incinerators, drip pads, and dangerous waste munitions and explosives storage are not addressed, as these types of DWMUs are not included in the Permit.

The CAP also provided guidance for the corresponding information that must be provided per WAC 173-303-806 in Part B of the permit application, and that must be established as enforceable requirements of the Permit. For WAC 173-303-645 requirements, refer to the GWMP CAP.

3.4 Focus Group Decisions

The following issues were identified following the 2012 draft Rev. 9 Permit renewal public comment period. Ecology received several comments on the following issues in the comment period and made it a priority to address them as soon as possible in the development of a

revised permit renewal. The following issues are explained below with their resolution and path forward.

More detailed information is included in Ecology's Administrative Record.

3.4.1 Compliance Schedules

In the draft Rev. 9 Permit renewal, there were Compliance Schedules included in some of the unit groups. Following the public comment period, Ecology received several comments on this issue and decided to limit use of Compliance Schedules as follows:

The WTP unit group includes a series of Compliance Schedules for its construction portion of the permit. Once operating, the compliance schedule no longer applies to those facilities. No other unit group includes a schedule of compliance.

If compliance schedules are used in unit groups in the future, they cannot be used to allow for later submission of information that is required as part of a complete permit application.

Permittees must follow these guidelines:

- Require compliance as soon as possible. WAC 173-303-815(3)(a)(i).
- If a schedule of compliance is established, and it exceeds one year from the date of permit issuance, the schedule must set forth interim requirements and the dates for their achievement. WAC 173-303-815(3)(a)(i)(ii).
- When writing a compliance schedule, consider whether the Permittees will need to submit a request to modify the permit once it meets the schedule for coming into compliance. If so, require submissions in compliance with WAC 173-303-830(3)(a) and WAC 173-303-040, as appropriate.
- Compliance schedules must be specific, enforceable, allow for public notice and comment on the detailed permit condition, and allow the applicant additional time only where that time is legitimately needed. See EPA Guidance PPC9524.1984(01).

3.4.2 Risk Budget Tool

Ecology received several comments on the use of the Risk Budget Tool (RBT). Within the IDF unit group Permit Condition III.11.E.5.d, it says,

> The Risk Budget Tool (RBT) provides a reasonable basis for assurance that each SSW (secondary solid waste) formulation will, once disposed in the IDF in combination with the other waste volumes and waste forms planned for disposal at the entire IDF, be adequately protective of human health and the environment. Any updates to the RBT will be in accordance with Permit Condition III.11.E.10.

The RBT is only being used in the IDF Unit Group. It will not be applied to any other unit group permitting under landfill regulations. The Permittees agreed to include the RBT for IDF and concurred with the determination not to apply it at other land disposal units.

3.4.3 Off-Site Transportation

Ecology received several comments that focused on the transportation of off-site radioactive waste to Hanford. This issue is outside the scope of the draft Rev. 9 Permit renewal. The draft Rev. 9 Permit renewal was limited to the TSD of dangerous and mixed radioactive waste at Hanford. The following is information that addresses some concerns that Ecology received in public comments:

Background Information on Transportation of Radioactive Waste

The U.S. Department of Transportation (DOT) and the U.S. Nuclear Regulatory Commission (NRC) share primary responsibility for establishing and enforcing requirements for the safe transport of radioactive materials in the United States. All shipments of radioactive material must comply with the DOT requirements, and all vehicles transporting radioactive waste are inspected by the Washington State Patrol. The DOT regulations set the standards to package, transport, and handle radioactive materials, including labeling, shipping papers, signage, loading, and unloading requirements. For example, trucks are tracked by satellite and follow procedures which prevent travel during bad weather or poor road conditions.

NRC sets design and performance standards for containers that carry radioactive materials. NRC also establishes safeguard and security regulations to minimize the possibility of theft, diversion, or a terrorist attack on shipments.

DOT regulations require carriers of radioactive shipments to use “preferred routing,” which takes into consideration such factors as: accident rate, transit time, population density, activities, time of day, and day of week.

Concerns Regarding Additional Exposure to Radioactive Materials

According to the National Council on Radiation Protection and Measurements, the average person receives around 360 millirem annually from natural and manmade sources of radiation. A millirem is a unit of absorbed radiation dose. People living less than 100 feet from a transport route and exposed to a vehicle containing the highest level or greatest quantity of radioactive materials would receive 0.0005 millirem per shipment.

3.4.4 Omnibus

Some of the public comments addressed Ecology’s use of Omnibus authority in permitting the Hanford Site-wide Permit renewal. Omnibus authority comes from WAC 173-303-815(2)(b)(ii). Going forward, Ecology developed a checklist and guidance for those occasions in which omnibus was used in any permit document to ensure it is being used appropriately and is justified.

3.4.5 Management of Radioactive and Mixed Waste

The following is a list of issues provided to Ecology as part of the draft Rev 9 Permit renewal comments and are associated with management of radioactive and mixed waste. Responses and background, where available, are included in the response. The Permittees provided comments on the following:

1. Ecology cannot use the word “radioactive” when referring to mixed waste because the USDOE has sole authority over radioactive waste.
2. The use “radioactive,” “radionuclide,” or “radiological” should not be included in the Permit as the USDOE has sole authority over radioactive waste.
3. The Permittees do not want to provide information on the radioactive component of mixed waste or provide information because Ecology is then regulating the radioactive component of mixed waste.
4. The USDOE does not want the use of an AEA disclaimer. The USDOE commented that Ecology cannot regulate radioactive materials, but they do want the State to consider issues such as high radiation and As Low As Reasonably Achievable (ALARA) requirements when making decisions about mixed waste, i.e., cannot remediate a problem discovered by an inspection without considering the radioactive portion of mixed waste.
5. The USDOE wants Ecology to acknowledge that their radioactive materials issues (e.g., shielding, waste requirements) require overriding some WAC requirements.

3.4.5.1 “Mixed Waste” Versus “Radioactive Mixed Waste”.

- When Ecology is referring to mixed waste, it should not use the term “radioactive mixed waste.”
- **Resolution**: Anywhere in the Permit the term “radioactive mixed waste” was used to describe mixed waste, Ecology did not use the term radioactive mixed waste to describe mixed waste. The definition of mixed waste and the WAC 173-303-040 citation will be included in the definitions section.

3.4.5.2 Radioactive, Radionuclide, or Radiological

- The USDOE commented that Ecology should not use “radioactive,” “radionuclide,” or “radiological” in the draft Rev. 9 Permit renewal stating the USDOE has sole authority over radioactive waste. The USDOE states Ecology was attempting to regulate the radioactive component of mixed waste.
- Ecology does not regulate solely radioactive waste at Hanford under the dangerous waste regulations. However, dangerous waste regulations do include the permitting of activities for mixed waste, which is defined in WAC 173-303-040 as “dangerous, extremely hazardous, or acutely hazardous waste that contains both a nonradioactive hazardous component and, as defined by 10 CFR 20.1003, source, special nuclear, or by-product material subject to the Atomic Energy Act of 1954 (42 U.S.C. 2011 et seq.).”
- **Resolution:** Ecology will continue to use the words “radioactive” and “radionuclides” in the draft Rev. 9A Permit renewal to accurately detail the wastes, monitoring or operations that are managed at the Hanford Site but will clarify in the permit text and in the fact sheet that Ecology does not regulate the radioactive component of mixed wastes.

3.4.5.3 Requesting Information Constitutes Regulation of the Radioactive Component of Mixed Waste

- The USDOE commented that the agency does not want to provide information on the radioactive component of mixed waste or provide information to Ecology, because that can be interpreted as Ecology providing regulatory oversight.
- **Resolution:** The issue of providing information on the radioactive component of mixed waste was addressed in unit group workshops on a case-by-case basis.

3.4.5.4 The United States Department of Energy does not want the use of an Atomic Energy Act disclaimer

- The USDOE commented that Ecology cannot regulate radioactive materials, but they do want Washington State to consider issues such as high radiation and ALARA requirements when making decisions about mixed waste, i.e., cannot remediate a problem discovered by an inspection without considering the radioactive portion of mixed waste.
- **Resolution:** The AEA disclaimer must be included in the draft Rev. 9A Permit renewal. The purpose of the disclaimer is:
  1. To acknowledge that, on occasion, information regarding the presence, content, treatment, management, or disposal of the radioactive components of mixed waste has been purposefully included in the permit; and
  2. To assert that where it has been included, it is not for purposes of regulating the radiation hazards of such components under the draft Rev. 9A Permit renewal.

3.4.5.5 The United States Department of Energy wants Ecology to acknowledge that radioactive materials issues (e.g., shielding, waste requirements) requires overriding some Washington Administrative Code requirements

- Radioactive components of the waste create a hazard for the people who must manage the waste, and it is generally a good practice in mixed waste management to follow ALARA recommendations. It is hard to justify ALARA recommendations for waste handling procedures without mentioning that they are due to the radioactive materials in the wastes. Normal procedures for handling mixed waste, such as sampling may have to be changed to accommodate ALARA concerns.
- **Ecology's path forward:** To understand the issue from the perspective of ALARA requirements, Ecology ensured that all the information regarding mixed waste to include the radioactive component is identified. Ecology cannot accept waivers or exceptions from WAC requirements without justification. That justification should be provided through descriptions of the issues causing the need for noncompliance.

3.4.6 References to the Tri-Party Agreement

Ecology received comments on references to the TPA. References are included throughout the draft Rev. 9A Permit renewal appropriately and all issues were addressed individually.

3.4.7 Washington v Chu Consent Decree

Ecology received comments on references to the *Washington v. Chu*, Case No. 08-5085-FVS Consent Decree signed in 2010. For consistency, references to the *Washington v. Chu*, Case No. 08-5085-FVS Consent Decree within the draft Rev. 9A Permit renewal were agreed to be implemented between the WTP and SST Unit Chapters. This language is referenced below:

Washington v. Chu Consent Decree means the consent decree entered in Washington v. Chu, Case No. 08-5085 FVS, on October 25, 2010, providing certain requirements relating to SST retrieval and waste treatment plant construction and initial operation.

3.5 Additional Decisions for the Renewal

3.5.1 Certification of Documents

Ecology letter 13-NWP-054 clarified that under WAC 173-303-830 and Hanford Site-wide Permit Condition I.C, Class 2 and 3 permit modification requests to a dangerous waste permit must meet WAC 173-303-810(12) and (13) certification requirements upon submittal. The required certification is limited to just the modified text.

For the draft Rev. 9A Permit renewal, deficient information was submitted to Ecology certified unless document changes were considered minimal (green documents were considered to have minimal changes). (See information on Section 2.1.5 Color-Coded Process for Permit Files.)

3.5.2 Cover Design

At the time of preparation of the draft Rev. 9A Permit renewal, the Permittees and Ecology needed to come up with a solution for cover design for landfills. The requirements for the level of detail required by WAC 173-303 for landfill permits and when this information is due to Ecology is included in the following WAC regulations:

- WAC 173-303-335 *Construction quality assurance program*.
- WAC 173-303-806(4)(h) Specific Part B information requirements for landfills. WAC 173-303-806(4)(h)(v) Detailed plans and submittals describing the final cover, which incorporates by reference:
  - WAC 173-303-665(6)(a), (b), and (c).
  - WAC 173-303-806(4)(a)(xiii).

Due to the amount and type of borrow source material required, environmental assessments [e.g. State Environmental Policy Act (SEPA)/National Environmental Policy Act (NEPA)], and the associated infrastructure, Ecology considers it essential that dangerous waste permitting closure plans are backed by:

- Identifiable sources of borrow material included in technical submittals, and
- The inclusion of details for the infrastructure necessary to construct each cover design in the technical submittals.

To meet the dangerous waste regulations, Ecology agreed with the Permittees that they will submit one or two permit modifications at the appropriate time to add to the affected unit group closure plans. The permit modifications will include the required details in a timeframe

that aligns with Ecology's permitting requirements and the Permittees timeframes to prepare for closure. The first modification would incorporate an Engineering Report, and a subsequent permit modification would provide detailed technical design document submittals. Both modifications will be Class 3 permit modifications.

The intent of having separate modifications for the first cover design, or subsequent significant changes, is to afford public involvement and obtain public acceptance in the cover selection process prior to the Permittees investing in development of detailed technical design document submittals.

The Addendum K will be submitted by the Permittees at the time the detailed technical design documents are submitted. Ecology will then draft an Addendum H, if needed, as well as accompanying Unit-Specific Permit conditions.

3.5.3 Transfer of Owner and Co-Operator

Ecology and the Permittees addressed several changes in co-operator since the draft Rev. 9 Permit renewal in 2012. Under Permit Condition I.E.14, Transfer of Permits, the owner and co-operators notified Ecology of the upcoming transfer and worked with Ecology on updating permit documents under WAC 173-303-830(3)(b).

The path forward that Ecology and the Permittees took was for the Permittees to submit Class [1]1 permit Modification package that included the PCNs and updated Part A Forms and topographic maps. In addition, the Permittees provided a signed Statement of Transfer, which transferred co-operator responsibilities from one contractor to another. The Permittees then had up to one year to provide additional updates to the remainder of the unit group permit documents, Part I and II Conditions, and Attachments.

3.5.4 Standard Permit Conditions

The draft Rev. 9 Permit renewal went out for public review with a set of new draft Part I and II Conditions, definitions, and acronyms. The standard permit conditions apply to all unit groups in the draft Rev. 9A Permit and supersede unit-specific permit conditions that may conflict with the standard permit conditions.

To prepare for the revised renewal, the draft Rev. 9 Permit Conditions were discussed with EPA, Ecology HWTR program staff, and the Washington State AGO's. The standard permit conditions are consistent with other Washington State Dangerous Waste Permits. Draft Rev. 9A Permit Part I Conditions were revised to reflect Washington State Permit model language for standard permit conditions.

Conditions were reviewed to ensure all appropriate language per development of CAP guidance and issue resolutions through Tier 1 and 2 agreements. Finally, the Parts I and II Conditions were updated in response to public comments.

Ecology shared the Part I and II Conditions with the Permittees. Most comments were resolved in workshops.

Ecology also shared Unit-specific Permit Conditions and technical Fact Sheets with the Permittees as a courtesy.

Table 3-2, Parts I and II Condition Changes, is a summary of the revisions to the standard permit conditions. Table 3-3, Permit Condition Crosswalk, shows the section numbers and title changes from the Rev. 8C Permit and draft Rev. 9 Permit renewal to the draft Rev. 9A Permit Conditions.

This page intentionally left blank.

Table 3-2 Parts I and II Condition Changes

Draft Rev. 9A Permit Part I and II Condition, Location and Reference to Rev. 8C and 9 Permit Conditions	Title of the Draft Rev. 9A Permit Conditions	Summary of Changes and Resolution of Comments
Table of Contents	Table of Contents	A request was made to add a Table of Contents and Ecology accepted that comment.
Signature Page	Signature Page	Ecology received comments on updating the signature page information. The comments had already been addressed in the Hanford Site-wide Permit, Rev. 8C.
Definitions	Definitions	Ecology received 19 comments on the definitions and acronyms. Ecology accepted most of the comments. Of note, the term **"Area of Concern"** was removed since it is listed in WAC 173-303-040 and all definitions in WAC 173-303-040 are incorporated by reference into the permit. **"Critical Systems"** definition was removed, and the definition is included in the appropriate unit-specific conditions. **"Off-site Waste"** was removed from the definitions portion of the Standard Conditions and included in unit-specific conditions in the IDF, the 325 HWTU, Building, LLBGs 31/34, T Plant, and CWC. Comments were also made that the two definitions of "facility" in the Rev. 9 Part I and II Conditions are not accurate. Ecology's current definitions in Rev. 8C are accurate and we accepted their comment. The two "**facility**" definitions from Rev. 8C have been incorporated into the draft Rev. 9A Permit Part I and II Conditions.
Introduction	Introduction	The list of Permittees was updated.
I.A, I.A.1 and I.A.2 (I.A, I.A.1 and I.A.2 in Rev. 9 and I.A and I.A.1 Rev. 8C)	Effect of the Permit	Permit conditions include Washington State Permit Condition model language. In response to a comment, we removed the list of the Permittees as this is duplicative information in the Parts I and II Conditions.
I.A.3 (I.A.3 in Rev. 9 and is not currently in Rev. 8C)	Effect of the Permit	Permit condition now reflects Ecology's Permit Condition model language.
I.A.4 (new permit condition)	Effect of the Permit	Permit condition now reflects Ecology's Permit Condition model language.
I.A.5 in Rev. 9 (I.A.2 in Rev. 9 and not currently in Rev. 8C)	Effect of the Permit	Permit condition now reflects Ecology's Permit Condition model language.

Table 3-2 Parts I and II Condition Changes

Draft Rev. 9A Permit Part I and II Condition, Location and Reference to Rev. 8C and 9 Permit Conditions	Title of the Draft Rev. 9A Permit Conditions	Summary of Changes and Resolution of Comments
I.A.6 (Not in Rev. 9 or currently in Rev. 8C)	Effect of the Permit	Permit condition now reflects Ecology's Permit Condition model language.
I.A.7 (I.A.3 in Rev. 9, I.A.7 in Rev. 8C)	Effect of the Permit	Permit conditions were revised to reflect standard Washington State Permit Condition model language and to clarify the responsibilities of the USDOE as owner. A comment was made on this as well and we accepted it. Reference to Attachment 8 was removed from this permit condition as that is not the current, appropriate reference. Additionally, Ecology received a comment to request that a reference to Attachment 9 is included and we accepted the comment.
I.A.8 (I.B in Rev. 9 and 8C)	Property Rights	Ecology accepted a comment to remove a reference to violation of federal regulations.
I.B (I.A.4.a, I.A.5, and I.A.6 in Rev. 9, I.A.2 in Rev. 8C)	Coordination with the HFFACO and Consent Decree	The following language was updated due to a comment, "If the Permittees are not in compliance with any requirements of the Hanford Federal Facility Agreement and Consent Order as so incorporated, Ecology may take action to independently enforce those requirements as requirements under this Permit." Permit Condition I.A.6 was removed as requested in a comment, "In the event that a unit-specific Permit condition in Parts III through VI conflicts with the Part I Standard Conditions and/or Part II General Facility Conditions of the Permit, the unit-specific Permit condition will prevail." The Parts I and II Conditions prevail over the unit-specific conditions.

Table 3-2 Parts I and II Condition Changes

Draft Rev. 9A Permit Part I and II Condition, Location and Reference to Rev. 8C and 9 Permit Conditions	Title of the Draft Rev. 9A Permit Conditions	Summary of Changes and Resolution of Comments
I.C (I.C.2 in Rev. 9 and I.C.3 in Rev. 8C)	Permit Actions	Permit conditions were revised to reflect standard Washington State Permit Condition model language and reflect resolution of comments. Note: I.C.1 in Rev. 9, Facility Construction has been deleted as a result of public comments. The following was added to I.C.2.b, "A unit-specific portion may be transferred to a new operator as a Class [1]1 permit modification with prior approval from Ecology's Director [WAC 173-303-290(2)]."
I.C.1 (I.C.3, I.G.1 in Rev. 8C and Rev. 9)	Permit Modification, Revocation, Reissuance and Termination	The I.C.1 Permit Conditions include information in reference to permit modifications. The quarterly permit modification submittal is still included. The process for modifications has changed through Ecology's configuration control of the permit. Ecology received a comment on the permit condition to request that the Hanford Site-wide Permit, Rev. 8C quarterly language be retained. In discussions on the permit conditions, the USDOE requested additional time to transmit and notify the public of Class 1 and [1]1 permit modifications according to WAC-173-303-830. Ecology updated the permit condition to provide the USDOE 21 days following the end of the quarter to transmit and notify the public of Class 1 and [1]1 permit modifications. The permit modifications are posted to Ecology's website upon approval. Ecology also removed all references to the HFFACO, also known as the TPA and Community Relations Plan public notices. Additionally, Ecology included a Permit Condition I.C.1.f to require that the Permittees provide changes such as updates to engineering drawings that included non-dangerous waste changes but updated the revision number. The Permittees will provide those updates in the quarterly permit modification letter and include in a

Table 3-2 Parts I and II Condition Changes

Draft Rev. 9A Permit Part I and II Condition, Location and Reference to Rev. 8C and 9 Permit Conditions	Title of the Draft Rev. 9A Permit Conditions	Summary of Changes and Resolution of Comments
		Class 1 Permit Modification Request Form for Ecology's review and concurrence. This would not include the engineering drawings and documents in support of the WTP.
I.C.2 (I.G.1 in Rev. 9)	Transfer of Permit	Ecology received a comment to revise the permit condition for consistency. Ecology accepted the comment and revised it to reflect Washington State Permit Condition model language.
I.C.3 (I.H in Rev. 9)	Duty to Reapply and Permit Continuation	Ecology received a comment to request that we provide accurate permit regulatory language from WAC 173-303-806(7). Ecology accepted the comment and revised the permit condition. A comment was made on I.H.2.b in Rev. 9 and asked that the permit condition be deleted. Ecology added Washington State Permit Condition model language regarding expiration of the permit.
I.D (I.D in Rev. 9 and in Rev. 8C)	Severability	Ecology received comments on this permit condition that it conflicts with I.D.2. Ecology did not agree that there is a conflict and made a decision to retain the language.
I.D.2 (I.D.2 in Rev. 9 and in Rev. 8C)	Final Resolution	The permit condition includes updated language from the draft Rev. 9 permit conditions. Ecology received additional public comments on this permit condition and decided to retain the language.
I.E.1 (in Rev. 8C and 9)	Duty to Comply	The Permit Condition I.E.1 was updated to be consistent with Washington State Permit Condition model language. Ecology received a comment to revise the permit condition and we did not accept the comment.
I.E.2 (in Rev. 9/I.E.5 in Rev. 8C)	Duty to Halt or Reduce Activity	The permit condition was updated to Washington State Permit Condition model language. Ecology received a comment to revise the title of this permit condition, and we accepted the comment.

Table 3-2 Parts I and II Condition Changes

Draft Rev. 9A Permit Part I and II Condition, Location and Reference to Rev. 8C and 9 Permit Conditions	Title of the Draft Rev. 9A Permit Conditions	Summary of Changes and Resolution of Comments
I.E.3 (in Rev. 9/I.E.6 in Rev. 8C)	Duty to Mitigate	The permit condition was revised to include regulatory language from WAC 173-303-810(5) and is consistent with Washington State Permit Condition model language.
I.E.4 (in Rev. 9/I.E.7 in Rev. 8C	Proper Operation and Maintenance	Ecology received a comment on this permit condition to use the regulatory language as verbatim. Ecology accepted the comment and included complete regulatory language from WAC 173-303-810. Additionally, the WAC citation was added at the end. Another comment was received to remove Permit Condition I.E.4.b. The comment said that there is no regulatory basis for the permit condition, "In the absence of manufacturer's instructions or applicable regulatory or code requirements, the Permittees will apply generally accepted operating or engineering practices as necessary to achieve proper operation, maintenance, and protection of human health. WAC 173-303-810(6)." Ecology agreed and removed the permit condition.
I.E.5 (in Rev. 9/I.E.8 in Rev. 8C)	Duty to Provide Information	Ecology added this permit condition, "Nothing in this Condition is intended to limit or diminish information access provisions contained within HFFACO. [WAC 173-303-810(9)]"
I.E.6 (in Rev. 9 and I.E.9 in Rev. 8C)	Inspection and Entry	Permit condition I.E.6 was revised to include Washington State Permit Condition model language. In addition, Ecology received a comment to remove the word "proper" in the condition. "The Permittees will allow representatives of the department, upon presentation of *proper* credentials to…" Ecology accepted part of their comment by revising the language to state, "Pursuant to WAC 173-303-810(10), the Permittees must allow Ecology, or authorized representatives, upon presentation of Ecology credentials, to…" The term "proper" was removed. Additionally, Ecology accepted a public comment by adding the regulatory language and the WAC citation at the end of Permit Conditions I.E.6.a.ii. and I.E.6.a.iii.

Table 3-2 Parts I and II Condition Changes

Draft Rev. 9A Permit Part I and II Condition, Location and Reference to Rev. 8C and 9 Permit Conditions	Title of the Draft Rev. 9A Permit Conditions	Summary of Changes and Resolution of Comments
I.E.7 (Anticipated Noncompliance in Rev. 9/I.E.11 Other Noncompliance in Rev. 8C)	Reporting Planned Changes	Permit condition was revised to include Washington State Permit Condition model language. A comment was made to request that we revise the permit condition to include the appropriate regulatory citation and language under -810(14). Ecology accepted their comment.
I.E.8 (I.F.5 in Rev. 9/I.E.15 in Rev. 8C)	Reporting Noncompliance with the Permit and Reporting Emergencies	Permit condition I.E.8 was revised to include Washington State Permit Condition model language. A comment was made to request that Permit Condition I.E.7.a, as written in Rev. 9 to exclude the last sentence, "Prior to implementation of any planned change(s), the Permittees must receive any Ecology approval required through the permit modification processing in accordance with Permit Condition I.C." The permit condition was revised and renumbered as I.E.8.c and reads, "The Permittees must give advance notice to Ecology as soon as possible of any planned changes in the permitted facility or activity that may result in noncompliance with permit requirements. Such changes require a permit modification pursuant to WAC 173-303-830 before they can be implemented. [WAC 173-303-810(14)(b)]"
I.E.9 (I.E.9, Other Information in Rev. 9)/I.E.20 Other Information in Rev. 8C)	Reporting Relevant Facts and Incorrect Information	Permit condition I.E.9 was revised to include Washington State Permit Condition model language. Ecology received and accepted a comment on the Rev. 9 permit condition, "Other Information." The title was replaced it with "Reporting Relevant Facts and Incorrect Information." The draft permit condition reads, "Pursuant to WAC 173-303-810(14)(h), if the Permittees become aware that they failed to submit any relevant facts in the permit application, or submitted incorrect information in the permit application, or in any report to Ecology, the Permittees must promptly submit the relevant and correct information."

Table 3-2 Parts I and II Condition Changes

Draft Rev. 9A Permit Part I and II Condition, Location and Reference to Rev. 8C and 9 Permit Conditions	Title of the Draft Rev. 9A Permit Conditions	Summary of Changes and Resolution of Comments
I.E.10 (I.F.4 in Rev. 9)	Reporting Compliance Schedules	The permit condition was revised to include Washington State Permit Condition model language.
I.E.11 (I.E.17 and 18 in Rev. 8C)	Other Reporting	Permit condition I.E.11 was revised to include Washington State Permit Condition model language. Ecology received a comment that we include regulatory citation WAC 173-303-370(5) and we added that citation and accepted the comment. Ecology also received a comment that the regulatory citation be revised regarding the annual dangerous waste report and for unmanifested waste reports, annual reports, and any other reports. We accepted the comments and added the correct citation WAC 173-303-390(2). A comment was made to include WAC citation -390(1). Ecology rewrote the permit condition to be consistent with the regulations.
I.E.12 (Did not exist in Rev. 9 and 8C)	Information Repository	Permit Condition I.E.12 was revised to include Washington State Permit Condition model language.
I.F (I.F in Rev. 9 and I.E.10 in Rev. 8C)	Monitoring and Records	Regarding sampling and testing methods, Permit Condition I.F was changed to reflect Washington State Permit Condition model language. Ecology received a comment in which they wanted the text to be revised to read, “Samples and measurements taken for the purpose of monitoring must be representative of the monitored activity.” Ecology accepted the comment. Permit Condition I.F.1.c in Rev. 9 was deleted.
I.F.2 (I.F in Rev. 9 and I.E.10 in Rev. 8C)	Monitoring and Records	The permit condition was revised to include Washington State Permit Condition model language.

Table 3-2 Parts I and II Condition Changes

Draft Rev. 9A Permit Part I and II Condition, Location and Reference to Rev. 8C and 9 Permit Conditions	Title of the Draft Rev. 9A Permit Conditions	Summary of Changes and Resolution of Comments
I.F.3.a (I.F in Rev. 9 and I.E.10 in Rev. 8C)	Monitoring and Records	No changes were made to the permit conditions except to add the WAC citation. The detail in I.F.3 was missing from the Rev. 9 permit conditions but was added back in as I.F.3.a—f.
I.F.4	Monitoring and Records	This permit condition was added in to be consistent with Washington State Permit Condition model language.
I.F.6	Monitoring and Records	Ecology received a comment that the term “General File” be removed in regard to the Hanford Facility Operating Record. The permit condition was deleted and references to General File were removed from the permit conditions.
I.E.8 (I.F.7.a in Rev. 9)	Monitoring and Records	Ecology received a comment that the Permittees can submit a non-compliance report or record non-compliances in the Operating Record. Ecology accepted the comment and rewrote the permit condition to be consistent with Washington State Permit Condition model language. Permit condition I.E.8 addresses reporting non-compliances with the permit.
I.G (I.I and I.K in Rev. 9 and I.F in Rev. 8C)	Signature and Certification Requirements	Permit condition I.G was revised to include Washington State Permit Condition model language. “Should” was revised to “must” in I.G.2. We accepted the comment to add in the names of the attachment in this permit condition.
I.H (I.L in Rev. 9 and I.G in Rev. 8C)	Confidential Information	Permit Condition I.H was revised to include Washington State Permit Condition model language.
I.I (II.T in Rev. 9 and II.Z in Rev. 8C)	Waste Minimization	Permit condition I.I was revised to include Washington State Permit Condition model language.
I.J (Permit Condition is not present in the Rev. 9 or Rev. 8C)	Performance Standards	Permit condition I.J was added, and includes Washington State Permit Condition model language.

Table 3-2 Parts I and II Condition Changes

Draft Rev. 9A Permit Part I and II Condition, Location and Reference to Rev. 8C and 9 Permit Conditions	Title of the Draft Rev. 9A Permit Conditions	Summary of Changes and Resolution of Comments
I.K (I.M.3 in Rev. 9 and I.H in Rev. 8C)	Documents and Records to be Maintained at the Facility Site	Permit Conditions I.K were revised to include Washington State Permit Condition model language. Permit Condition I.K.1 provides information on management of the permit and Ecology has configuration control of the permit and maintains the official copy. I.K.2 was updated to respond to comments regarding final closure of the facility. I.K.3 reflects Washington State Permit Condition model language. Ecology received a comment regarding maintaining copies of the Hanford Site-wide Permit at the Ecology Administrative Record and the Hanford Operating Record. Additionally, we received a comment that we reference maintenance of electronic versions of original documents. Ecology accepted the comment. Finally, Ecology received a comment that we delete language regarding maintaining information in post-closure care or corrective action. We did not accept the comment. Ecology received a comment that we remove reference to the location of the HFFACO Administrative Record. The physical location of the Administrative Record is not included in the permit conditions but the electronic location remains. Additionally, Ecology received a comment, and we accepted, that we delete the permit condition that we specify the location of an information repository.
II.A (II.A in Rev. 9 and 8C)	Facility Contingency Plan	Permit Conditions II.A represent the most current conditions and reflect agreements made with the Permittees in Contingency Plan CAP workshops and subsequent Class 3 permit modification issued in 2020. References to I.C.3 were changed to I.C.1 within the II.A Permit Conditions.

Table 3-2 Parts I and II Condition Changes

Draft Rev. 9A Permit Part I and II Condition, Location and Reference to Rev. 8C and 9 Permit Conditions	Title of the Draft Rev. 9A Permit Conditions	Summary of Changes and Resolution of Comments
		Ecology received a public comment that we discontinue use of "file" when referencing the Hanford Operating Record. We accepted the comment. A comment was also made to remove references to requirements for contingency plans for PCUGs. Ecology did not accept the comment as the permit conditions reflect agreements we made with the USDOE in a Class 3 permit modification issued in 2020. Finally, Ecology received a comment that we allow for permit changes not subject to permit modifications under WAC 173-303-830 be made to update contingency plans, such as updates to the Building Emergency Directors and their point of contact information. We accepted this comment as the language already exists in II.A. The changes are known as "non-enforceable changes."
II.B (II.B In Rev. 9 and 8C)	Preparedness and Prevention	Permit conditions represent the most current conditions and reflect agreements made with the USDOE in the Class 3 permit modification issued in 2020. Ecology received a comment that the text in II.B be revised regarding maintaining sufficient aisle space. The Permit Condition is no longer included in II.B.
II.C (II.C In Rev. 9 and 8C)	Personnel Training	Permit conditions include original draft Rev. 9 permit conditions from 2012, as well as updates and revisions made by Ecology. The references to the permit attachments to the Part I and II Conditions are also updated. Ecology received a comment to remove references to training requirements for PCUGs. Ecology did not accept the two comments and training requirements will continue for Part VI, PCUGs.

Table 3-2 Parts I and II Condition Changes

Draft Rev. 9A Permit Part I and II Condition, Location and Reference to Rev. 8C and 9 Permit Conditions	Title of the Draft Rev. 9A Permit Conditions	Summary of Changes and Resolution of Comments
		In II.C.3, Ecology received a comment that we move the sentence regarding updating course titles. Ecology had already removed this sentence. In addition, Ecology received a comment, and we accepted it to remove the term "file" when referencing the Hanford Operating Record. Permit Condition II.C.4 in Rev. 9 was revised to clarify requirements for maintenance of training records. Ecology received a comment that the term "final" be removed from "closure" in permit condition II.C.4.c of the current Rev. 9 permit conditions to be consistent with permit condition WAC 173-303-330(3). Ecology accepted the comment.
II.D (II.D In Rev. 9 and 8C)	Waste Analysis	II.D.2.a represents updated language and revisions. The remainder of the permit condition reflects draft Rev. 9 permit conditions from 2012. Permit Condition II.D.3.d that included waste designation quality control procedures was removed. The removal of the permit condition is in response to public comments. Ecology received a public comment that we include the WAC citation WAC 173-303-300(5). Ecology accepted the comment. Ecology received a comment on permit condition II.D.2, requesting that Ecology delete the permit conditions. Ecology did not accept the public comment. Ecology received a comment on permit condition II.D.3, recommending that the agency delete the permit conditions. Ecology partially accepted the comment as it was rewritten to address the concerns. Ecology modified this permit condition to read as follows, "Any permit modification to this Permit to include sampling and analysis requirements will include a quality assurance project plan to ensure that

Table 3-2 Parts I and II Condition Changes

Draft Rev. 9A Permit Part I and II Condition, Location and Reference to Rev. 8C and 9 Permit Conditions	Title of the Draft Rev. 9A Permit Conditions	Summary of Changes and Resolution of Comments
		data obtained are of adequate quantity and quality for their intended decision-making purposes." Ecology received two other comments in which the commenter requested that we delete II.D.3.a, II.D.3.b, and II.D.3.c and we did not accept those comments. Ecology received a comment that Ecology delete II.D.3.d and the permit condition was deleted.
II.E (II.E in Rev. 9 and not in Rev. 8C)	Cleanup of Released Material	II.E Permit Condition from Hanford Site-wide Permit, Rev. 9 was retained as written. II.E.1 was revised to respond to a comment to include WAC citation WAC 173-303-145 and we accepted it.
II.F (II.F in Rev. 9 and 8C)	Groundwater Monitoring and Corrective Action for Regulated Units	II.F Conditions reflect changes made following a Class 2 permit modification that updated the II.F Permit Conditions in Rev. 8C (8C.2020.2F). Ecology received a comment that we delete II.F.2.b and we accepted the comment. The permit condition is not included in the Rev. 9A permit conditions. A comment was received that requested we revise the permit condition based on the deletion of II.F.2.b. We did not accept this comment, and the permit conditions were revised and are now numbered II.F.2.c.ii. The permit conditions were rewritten to provide more clarity. Permit Condition II.F.3.c in the Hanford Site-wide Permit, Rev. 8C is deleted and will not be included in the Rev. 9A Renewal.
II.G (II.G in Rev. 9 and 8C)	Notice of Intent and Siting Criteria	II.G Conditions reflect updates made following internal discussions.

Table 3-2 Parts I and II Condition Changes

Draft Rev. 9A Permit Part I and II Condition, Location and Reference to Rev. 8C and 9 Permit Conditions	Title of the Draft Rev. 9A Permit Conditions	Summary of Changes and Resolution of Comments
II.H (II.H In Rev. 9 and not in Rev. 8C)	Financial Assurance	Rev. 9 Permit Condition from 2012 was retained as written. Ecology received a comment that we were missing a number in I.H.1 and we accepted the comment.
II.I (II.I in Rev. 9 and 8C)	Facility Recordkeeping and Reporting	II.I Conditions were updated. The II.I Condition language is consistent with the Part I Permit Condition language. Ecology also received a comment that we remove references to Part VI in Recordkeeping and Reporting. Ecology did not accept the comment and retained that reference as it is consistent with WAC 173-303-380(1)(g). For permit condition II.I.2, Ecology received and accepted a comment that we remove references to “file” for the Hanford Operating Record. Ecology received a comment on II.I.2.a, that requested that we revise the permit condition where there is a requirement to make available the operating records upon request. We did not accept their recommended text. Ecology received a comment that the permit condition be clarified for the types of information required for the operating record. The permit condition as written in Rev. 9 is no longer located in II.I.1, however, overall the information provided in II.I and I.K provide the clarification. A comment was made to delete Permit Condition II.I.2.d and Ecology accepted it. The condition is not included in Rev. 9A. Permit Condition II.I.4, Ecology received a comment that we delete the text regarding the Permittees requirement to provide Ecology with certification of completion of closure or post-closure care. Ecology revised the permit condition and it was re-numbered as II.I.1.

Table 3-2 Parts I and II Condition Changes

Draft Rev. 9A Permit Part I and II Condition, Location and Reference to Rev. 8C and 9 Permit Conditions	Title of the Draft Rev. 9A Permit Conditions	Summary of Changes and Resolution of Comments
		A comment was made that Ecology accepted on Permit Condition II.I.5.a that it be deleted. Ecology received and did not accept a comment that we delete permit condition II.I.5.b regarding facility recordkeeping of summaries of all records for corrective action. It is now numbered as II.I.1. Ecology received and accepted the comment that the term "file" be removed when referencing the Hanford Operating Record. Permit Condition II.I.5.d was deleted in response to a public comment.
II.J (II.J in Rev. 9 and 8C)	Facility Closure and Post-Closure	Permit Condition II.J.1 was requested in a comment to be revised to remove reference to post-closure. Ecology did not accept the comment, but the permit condition was revised. Permit Condition II.J.4, a comment was received that we delete post-closure and corrective action from the condition. Ecology revised the permit condition. The permit conditions were rewritten as follows: II.J.7, "Completion of closure activities must be documented using certifications as required in unit-specific Closure Plans."
II.K (II.K in Rev. 9 and II.R in Rev. 8C)	Equivalent Materials	Ecology received comments to retain the II.K permit condition in Rev. 9 for Equivalent Materials. The permit conditions that exist in the 2012 Rev. 9 and current Rev. 8C are marked "reserved" under II.K in Rev. 9A. Permit modification classification for equivalent materials will be consistent with regulations under WAC 173-303-830, Appendix I.

Table 3-2 Parts I and II Condition Changes

Draft Rev. 9A Permit Part I and II Condition, Location and Reference to Rev. 8C and 9 Permit Conditions	Title of the Draft Rev. 9A Permit Conditions	Summary of Changes and Resolution of Comments
II.L (II.L in Rev. 9 and II.M in Rev. 8C)	Security	No public comments were received on these permit conditions. Permit Conditions II.L were revised to include an additional sentence that the Permittees will also comply with applicable unit/unit groups specific security requirements in Parts III, IV, V and VI.
II.M (II.M in Rev. 9 and II.N 8C)	Receipt of Dangerous Waste Generated Offsite	Permit conditions are the same as the 2012 Rev. 9 Renewal. No public comments were received about these permit conditions.
II.N (II.N in Rev. 9 and II.P in Rev. 8C)	Manifest System	The current permit condition language reflects discussions and resolution of issues. Ecology received and accepted a public comment on II.N.1 that it be updated to remove reference to a unit-specific file for the Hanford Operating Record and to update the permit language. It is now numbered II.N.5. Another public comment recommended that Permit Condition II.N.2 be deleted. Ecology did not accept the comment, and it is now revised and renumbered as II.N.1. Ecology received a public comment to delete Permit Condition II.N.4. Ecology did not accept the comment and revised the permit condition. The permit condition is now numbered II.N.3. Ecology did not accept comments on Permit Conditions II.N.4.a through j. The permit condition was revised to update the permit language. A public comment was made to delete the permit conditions II.N.5 and II.N.5.a that support II.N.4 Permit Conditions regarding the manifest system. Ecology did not accept this comment and revised the permit condition. Permit Condition II.N.6 in Rev. 9 has been deleted.

Table 3-2 Parts I and II Condition Changes

Draft Rev. 9A Permit Part I and II Condition, Location and Reference to Rev. 8C and 9 Permit Conditions	Title of the Draft Rev. 9A Permit Conditions	Summary of Changes and Resolution of Comments
		Ecology received public comments on Permit Condition II.N.6.a—h and requested that we delete these permit conditions. Ecology revised the permit condition and it is now numbered II.N.5.
II.O (II.O in Rev. 9 and II.S in Rev. 8C)	Land Disposal Restrictions	No public comments were received on these conditions. Permit Condition II.O was revised and the permit conditions now reflect enforceable language.
II.P (II.P in Rev. 9, not in Rev. 8C)	Access to Property Not Owned/Controlled by Permittees	Permit conditions remained the same from the 2012 permit renewal except for a comment that requested that we include WAC citation 173-303-645(11)(e). Ecology accepted the comment.
II.Q (II.Q in Rev. 9 and 8C)	Other Laws, Regulations, Permits or Approvals	The permit conditions remain the same. No revisions were made, and the language is retained from the 2012 version. A public comment was made to delete the permit condition, and we did not accept the comment.
II.R (Schedule Alterations in Rev. 9 and Equivalent Materials in Rev. 8C)	Reserved	No comments were made on the Schedule Alterations portion of the permit conditions. The permit conditions on schedule alterations are not included in the revised renewal. (Comments on Equivalent Materials are included in the II.K portion.)
II.S	Reserved	II.S in the 2012 permit renewal was reserved.
II.T (Waste Minimization in Rev. 9 and Access and Information in Rev. 8C)	Reserved	Waste minimization permit conditions exist in the current Part I Conditions I.I.1. Ecology received and we accepted public comments that we remove reference to “file” when referring to the Hanford Operating Record. The II.T permit conditions are reserved in Rev. 9A.

Table 3-2 Parts I and II Condition Changes

Draft Rev. 9A Permit Part I and II Condition, Location and Reference to Rev. 8C and 9 Permit Conditions	Title of the Draft Rev. 9A Permit Conditions	Summary of Changes and Resolution of Comments
II.U (II.U in Rev. 9 and Rev. 8C)	Underground Piping	Ecology updated II.U Permit Conditions following a review of the permit language. Ecology received comments to delete the permit conditions, however, they are retained. Permit conditions II.U.1.a—c were deleted.
II.V (II.V in Rev. 9 and 8C)	Marking of Underground Piping	Ecology revised the permit condition language for II.V. We received comments about deleting the permit conditions, which we did not accept. We did, however, update the WAC citation in the conditions.
II.W (Reserved in Rev. 9 and I.K Other Permits and/or Approvals in Rev. 8C)	Reserved	In Rev. 8C, there are references to "other permits and approvals" in the I.K.1.c permit condition in the current permit renewal.
II.X (II.X in Rev. 9 and II.O in Rev. 8C)	Inspections	Permit Conditions II.X reflect requirements for the Permittees to inspect areas in between dangerous waste treatment, storage, and disposal unit groups. The II.X permit condition language reflects updated language. Ecology also received a public comment to remove the redundant regulatory language in II.X.1.b. Ecology did not accept the comment. Ecology also received a public comment to delete Permit Conditions II.X.1.c through II.X.1.d. Ecology did not accept the comment but revised the permit condition to remove any CERCLA requirements. Ecology received a public comment on Permit Condition II.X.1.e to remove the requirement for the annual RCRA Inspections. Ecology did not accept the comment. Permit Condition II.X.3.a, Ecology received a comment that we need to remove the requirement to keep the inspection record in the operating record. Ecology did not accept the comment.

Table 3-2 Parts I and II Condition Changes

Draft Rev. 9A Permit Part I and II Condition, Location and Reference to Rev. 8C and 9 Permit Conditions	Title of the Draft Rev. 9A Permit Conditions	Summary of Changes and Resolution of Comments
		Permit Condition II.X.4, Ecology received a comment that we need to revise the permit conditions to include considerations of radiological hazards when addressing hazards or other problems identified during inspections. Ecology made the decision to maintain the permit condition as written.
II.Y (II.Y in Rev. 9 and 8C)	Corrective Action	There were minor revisions to the draft Rev. 9 Permit Conditions. Public comments were received on the following: • A request was made that we change the title of II.Y.1.c to read Implementation of cleanup action. Ecology accepted the comment. • A public comment was received that we change the title of II.Y.1.e to Periodic review. Ecology accepted the comment. • A request was made that we clearly state that Ecology will not impose cleanup standards based on radionuclides. Ecology did not accept this comment and made the decision to retain the permit condition as written due to the 2000 Settlement of the Corrective Action Appeal (PCHB No. 00-050). • A public comment requested that we retitle the permit condition and move the permit condition to Part IV. Ecology did not accept this comment due to the 2000 Settlement of the Corrective Action Appeal (PCHB No. 00-050). • A request was made that we delete Permit Condition II.Y.3.a and all subsections from Permit Condition II.Y.2.a through II.Y.3.c. Ecology did not accept this comment due to the 2000 Settlement of the Corrective Action appeal (PCHB No. 00-050).

Table 3-2 Parts I and II Condition Changes

Draft Rev. 9A Permit Part I and II Condition, Location and Reference to Rev. 8C and 9 Permit Conditions	Title of the Draft Rev. 9A Permit Conditions	Summary of Changes and Resolution of Comments
		• Ecology received a public comment that requested that Ecology relocate the permit conditions to the Part IV portion of the permit. Ecology did not accept the comment due to the 2000 Settlement of the Corrective Action Appeal (PCHB No. 00-050). • A request was made in a comment that the Permit Conditions II.Y.3.b—II.Y.3.b.iii for the US Ecology site be relocated to Part IV of the Permit. Ecology did not accept the comment due to the 2000 Settlement of the Corrective Action Appeal (PCHB No. 00-050). • Ecology received a public comment that requested that Permit Conditions II.Y.3.c and II.Y.3.d be relocated to Part IV of the Permit. Ecology did not accept the comment due to the 2000 Settlement of the Corrective Action Appeal (PCHB No. 00-050).
II.Z (Not in Rev. 9 and II.AA in Rev. 8C)	Air Emission Standards for Process Vents	Permit conditions are included from Rev. 8C and minor edits are included. They were not included in the Rev. 9 2012 permit conditions. The conditions were updated with the most current language.
II.AA (Not in Rev. 9 and II.BB in Rev. 8C)	Air Emission Standards for Equipment Leaks	Permit conditions are included from Rev. 8C. They were not included in the Rev. 9 2012 permit conditions.
II.BB (Not in Rev. 9 and II.BB in Rev. 8C)	Air Emission Standards for Tanks, Surface Impoundments, and Containers	Permit conditions were included from Rev. 8C. They were not included in the Rev. 9 2012 document.

Table 3-3 Permit Condition Crosswalk

Permit Conditions in Rev. 9A	Permit Condition Title	Permit Conditions in Rev. 9	Permit Conditions in Rev. 8C
Table of Contents	Table of Contents	N/A	Table of Contents
Introduction	Introduction	N/A	Introduction
Signature Page	Signature Page	Signature Page	Signature Page
Definitions	Definitions	Definitions	Definitions
PART I – Standard Conditions			
I.A, I.A.1, and I.A.2	Effect of the Permit	I.A and I.A.1	I.A and I.A.1
I.A.3 (new permit condition)	Effect of the Permit	N/A	N/A
I.A.4 (new permit condition)	Effect of the Permit	N/A	N/A
I.A.5	Effect of the Permit	I.A.2	I.E.2 (Compliance Not Constituting Defense)
I.A.6 (new permit condition)	Effect of the Permit	N/A	N/A
I.A.7, I.A.7.a, and I.A.7.b	Effect of the Permit	I.A.3, I.A.3.a, I.A.3.b, and I.A.3.c	I.A.1
I.A.8, I.A.8.a, and I.A.8.b	Property Rights	I.B	I.B
I.B and I.B.1	Coordination with the HFFACO and Consent Decree	I.A.4 and I.A.4.a (Coordination with the HFFACO)	I.A.2
I.B.2	Coordination with the HFFACO and Consent Decree	I.A.5 (Coordination with the HFFACO)	N/A
I.C	Permit Actions	I.C	I.C
I.C.1, I.C.1.a, I.C.1.a.i, I.C.1.a.ii, I.C.1.a.iii, I.C.1.b, I.C.1.c, I.C.1.d, I.C.1.e, and I.C.1.f	Permit Modification, Revocation, Reissuance or Termination	I.C.2 and I.C.3 (Permit Modification Process) I.C.3.a, I.C.3.b, and I.C.3.c	I.C.1, I.C.2 (Filing of a Request), I.C.3 (Modifications), I.C.3.a, I.C.3.b, and I.C.3.c
I.C.2, I.C.2.a, I.C.2.b, I.C.2.c, and I.C.2.d	Transfer of Permit	I.G, I.G.1 and I.G.1.a	I.E.14, I.E.14.a, and I.E.14.b

Table 3-3 Permit Condition Crosswalk

Permit Conditions in Rev. 9A	Permit Condition Title	Permit Conditions in Rev. 9	Permit Conditions in Rev. 8C
I.C.3, I.C.3.a, I.C.3.a.i, I.C.3.a.ii, and I.C.3.b	Duty to Reapply and Permit Continuation	I.H (Duty to Reapply), I.H.1, I.H.2, I.H.2.a, and I.H.2.b	I.E.3 (Duty to Reapply) and I.E.4 (Permit Expiration and Continuation)
I.D	Severability	I.D	I.D
I.D.1	Effect of Invalidation	I.D.1	I.D.1
I.D.2 and I.D.2.a	Final Resolution	I.D.2	I.D.2
I.E	Duties and Requirements	I.E	I.E
I.E.1 and I.E.1.a	Duty to Comply	I.E.1	I.E.1
I.E.2 and I.E.2.a	Duty to Halt or Reduce Activity	I.E.2 (Need to Halt or Reduce an Activity Not a Defense)	I.E.5 (Need to Halt or Reduce an Activity Not a Defense)
I.E.3 and I.E.3.a	Duty to Mitigate	I.E.3	I.E.6
I.E.4 and I.E.4.a	Proper Operation and Maintenance	I.E.4, I.E.4.a, and I.E.4.b	I.E.7
I.E.5 and I.E.5.a	Duty to Provide Information	I.E.5	I.E.8
I.E.6, I.E.6.a, I.E.6.a.i, I.E.6.a.ii, I.E.6.a.iii, and I.E.6.a.iv	Inspection and Entry	I.E.6, I.E.6.a, I.E.6.b, I.E.6.c, and I.E.6.d	I.E.9, I.E.9.a, I.E.9.b, I.E.9.c, and I.E.9.d
I.E.7, I.E.7.a, I.E.7.a.i, I.E.7.a.ii, I.E.7.a.iii, and I.E.7.a.iv	Reporting Planned Changes	I.C.1 (Facility Construction), I.E.8, I.E.8.a, I.E.8.a.i, I.E.8.a.ii, and I.E.8.a.iii (Reporting Planned Changes)	I.E.11
I.E.8	Reporting Noncompliance with the Permit and Reporting Emergencies	N/A	N/A
I.E.8.a	Reporting Noncompliance with the Permit and Reporting Emergencies	I.F.5 (Immediate Reporting) and I.F.5.a	I.E.15 (Immediate Reporting), I.E.15.a, I.E.15.b, I.E.15.b.(i-viii)

Table 3-3 Permit Condition Crosswalk

Permit Conditions in Rev. 9A	Permit Condition Title	Permit Conditions in Rev. 9	Permit Conditions in Rev. 8C
I.E.8.b	Reporting Noncompliance with the Permit and Reporting Emergencies	I.F.7 and I.F.7.a (Other Non-compliance)	I.E.15.d, I.E.15.e, and I.E.19 (Other Noncompliance)
I.E.8.c	Reporting Noncompliance with the Permit and Reporting Emergencies	I.E.7 and I.E.7.a (Anticipated Noncompliance)	I.E.13 (Anticipated Noncompliance)
I.E.8.d	Reporting Noncompliance with the Permit and Reporting Emergencies	I.F.6 and I.F.6.a (Emergency Reporting)	I.E.15.c and I.E.16 (Written Reporting)
I.E.9 and I.E.9.a	Reporting Relevant Facts and Incorrect Information	I.E.9 and I.E.9.a (Other Information)	I.E.20 (Other information)
I.E.10 and I.E.10.a	Reporting Compliance Schedules	I.F.4 (Compliance Schedules) and I.F.4.a	N/A
I.E.11	Other Reporting	N/A	N/A
I.E.11.a	Other Reporting	I.F.3 (Monitoring Reports) and IF.3.a	N/A
I.E.11.b, I.E.11.b.i, I.E.11.b.ii, I.E.11.b.iii, and I.E.11.b.iv	Other Reporting	I.F.8 (Manifest Discrepancy Report), I.F.8.a, I.F.9 (Un-Manifested Waste Report), I.F.9.a, I.J, I.J.1.a, I.J.2, and I.J.3 (Annual and Other Reports)	I.E.17 (Manifested Discrepancy Report), I.E.17.a, I.E.17.b, I.E.18 (Un-Manifested Waste Report), and I.E.22 (Annual Report)
I.E.12, I.E.12.a, I.E.12.b, and I.E.12.c	Information Repository	I.M.4 and I.M.4.a (Documents to be Maintained at Facility Site)	I.H (Documents Maintained at the Facility Site)
I.F	Monitoring and Records	I.F (Monitoring, Records, and Reporting)	I.E.10 (Monitoring and Records)

Table 3-3 Permit Condition Crosswalk

Permit Conditions in Rev. 9A	Permit Condition Title	Permit Conditions in Rev. 9	Permit Conditions in Rev. 8C
I.F.1, I.F.2, I.F.2.a, I.F.2.b, I.F.3, I.F.3.(a-f), and I.F.4	Monitoring and Records	I.F.1, I.F.1.a, I.F.1.b, I.F.1.c, I.F.2 (Monitoring Records), I.F.2.a, and I.F.2.b	I.E.10.(a-e) and I.E.10.e.(i-vi)
I.G and I.G.1	Signature and Certification Requirements	I.K (Signatory Requirements) and I.K.1	I.F (Signatory Requirement)
I.G.2	Signature and Certification Requirements	I.I (Reports, Notifications, and Submissions) and I.I.1	I.E.21 (Reports, Notifications, and Submissions)
I.H and I.H.1	Confidential Information	I.L (Confidential Information)	I.G (Confidential Information)
I.I, I.I.1, I.I.1.a, I.I.1.b, and I.I.2	Waste Minimization	II.T (Waste Minimization), II.T.1, II.T.1.a, and II.T.1.b	II.Z (Waste Minimization), II.Z.1, II.Z.1.a, II.Z.1.b, and II.Z.2
I.J and I.J.1 (new permit condition)	Performance Standards	N/A	N/A
I.K, I.K.1, I.K.1.a, I.K.1.b, I.K.1.c, I.K.2 and I.K.3	Documents and Records to be Maintained at Facility Site	I.M (Documents to be Maintained at Facility Site), I.M.1, I.M.1.a, I.M.1.b, I.M.2, and I.M.3	I.H (Documents to be Maintained at Facility Site)
PART II – General Facility Conditions			
II.A and II.A.1	Facility Contingency Plan	II.A (Facility Contingency Plan) and II.A.1	II.A (Facility Contingency Plan) and II.A.1
II.A.2	Facility Contingency Plan	N/A	II.A.2
II.A.3	Facility Contingency Plan	II.A.2	II.A.3
II.A.4, II.A.4.a, II.A.4.b, II.A.5, II.A.6 and II.A.7	Facility Contingency Plan	II.A.3	II.A.4, II.A.4.a, II.A.4.b, II.A.5, II.A.6, and II.A.7
II.B, II.B.1, and II.B.2	Preparedness and Prevention	II.B and II.B.2	II.B, II.B.1, and II.B.2

Table 3-3 Permit Condition Crosswalk

Permit Conditions in Rev. 9A	Permit Condition Title	Permit Conditions in Rev. 9	Permit Conditions in Rev. 8C
II.B.3	Preparedness and Prevention	II.B.3	II.B.3
II.B.4	Preparedness and Prevention	II.B.3.b and II.B.4	II.B.4
II.B.5	Preparedness and Prevention	II.B.3.b	II.B.5
II.C and II.C.1	Personnel Training	II.C and II.C.1	II.C, II.C.1, II.C.2, and II.C.2.(a-e)
II.C.2 and II.C.3	Personnel Training	II.C.2 and II.C.3	II.C.2 and II.C.2(a-e)
II.C.4 and II.C.4.(a-e)	Personnel Training	II.C.4, II.C.5, II.C.5.a, II.C.5.b, II.C.5.c, and II.C.5.d	II.C.4
II.D, II.D.1, II.D.2, II.D.2.a, II.D.3, II.D.3.a, and II.D.3.b, and II.D.3.c	Waste Analysis	II.D, II.D.1, II.D.2, II.D.2.a, II.D.3, II.D.3.a, II.D.3.b, II.D.3.c, and II.D.3.d	II.D, II.D.1, II.D.2, II.D.3, II.D.3.(a-f), II.D.3.f.(i-v), II.D.4, (Waste Analysis) II.E, II.E.1, and II.E.2 (Quality Assurance/Quality Control)
II.E, I.E.1, and II.E.1.a	Cleanup of Released Material	II.E, II.E.1, and II.E.1.a (Cleanup of Released Material)	N/A
II.F, II.F.1, II.F.2, II.F.2.a, II.F.2.b, II.F.2.c, II.F.2.c.i, and II.F.2.c.ii	Groundwater and Vadose Zone Monitoring and Corrective Action for Regulated Units	II.F, II.F.1, II.F.2, II.F.2.a, II.F.2.b, and II.F.3 (Groundwater Monitoring)	II.F (Groundwater and Vadose Zone Monitoring)
II.F.3	Inspection and Training Requirements	N/A	II.F.1 (Inspection and Training Requirements)
II.F.4	Purgewater Management	N/A	II.F.2 (Purgewater Management)
II.F.5, II.F.5.a, and II.F.5.b	Well Inspection and Maintenance	N/A	II.F.3, II.F.3.a, II.F.3.b, and II.F.3.c (Well Inspection and Maintenance)

Table 3-3 Permit Condition Crosswalk

Permit Conditions in Rev. 9A	Permit Condition Title	Permit Conditions in Rev. 9	Permit Conditions in Rev. 8C
II.F.6	Well Construction	N/A	II.F.4 (Well Construction)
II.F.7 (new permit condition)	Changes to Groundwater Flow Regime	N/A	N/A
II.G, II.G.1, and II.G.2	Notice of Intent and Siting Criteria	II.G and II.G.1 (Siting Criteria)	II.G (Siting Criteria)
II.H and II.H.1	Financial Assurance	II.H (Financial Assurance)	II.H (Recordkeeping and Reporting)
II.I, II.I.1, II.I.2, II.I.2.a, II.I.2.b, II.I.3, II.I.4, and II.I.5	Facility Recordkeeping	II.I, II.I.1, II.I.2, II.I.2.a, II.I.3, II.I.4, II.I.5, and II.I.5(a-d) (Facility Recordkeeping)	II.I, II.I.1, II.I.1.(a-t) (Facility Operating Record)
II.J, II.J.1, II.J.2, II.J.3, II.J.4, II.J.5, and II.J.6	Closure and Post-Closure	II.J, II.J.1, II.J.2, and II.J.3 (Closure and Post-Closure)	II.J, II.J.1, II.J.2, and II.J.3 (Facility Closure)
II.J.6, II.J.6.a, and II.J.6.b	Closure and Post-Closure, Use of Alternative Requirements for Closure and Post-Closure	N/A	II.K, II.K.1, II.K.2, II.K.3, II.K.3.(a-c), II.K.4, II.K.5, II.K.6, and II.K.7 (Soil/Groundwater Closure Performance Standards) (see also Attachment 8)
II.J.7 and II.J.8	Closure and Post-Closure	II.J.4 (Closure and Post-Closure)	II.J.4, II.J.4.a, II.J.4.b, II.J.4.c, and II.J.4.d (The Permittees will close the Facility in a manner that)
II.K	Reserved	N/A	N/A
II.L and II.L.1	Security	II.L and II.L.1 (Security)	II.M (Security)
II.M and II.M.1	Receipt of Dangerous Waste Generated Offsite	II.M (Receipt of Dangerous Wastes Generated Offsite),	II.N (Receipt of Dangerous Wastes Generated Offsite), II.N.1 (Receipt of Offsite

Table 3-3 Permit Condition Crosswalk

Permit Conditions in Rev. 9A	Permit Condition Title	Permit Conditions in Rev. 9	Permit Conditions in Rev. 8C
		II.M.1, and II.M.1.a (Receipt of Off-Site Waste)	Waste), II.N.2 (Waste from Sources Outside the United States), II.N.3 (Notice to Generator)
II.N, II.N.1, II.N.2, II.N.3, II.N.3.(a-j), II.N.4, II.N.4.a, and II.N.5	Manifest System	II.N, II.N.1, II.N.2, II.N.3, II.N.4, II.N.4.(a-j), II.N.5, II.N.5.a, II.N.6, and II.N.6.(a-h) (Manifest System)	II.P, II.P.1, II.P.2, II.P.2.(a-h), II.P.3, II.P.4, II.Q, II.Q.1, II.Q.1.(a-h), and II.Q.2
II.O and II.O.1	Land Disposal Restrictions	II.O and II.O.1	II.S
II.P and II.P.1	Access to Property Not Owned/Controlled by Permittees	II.P and II.P.1 (Access to Property Not Owned/Controlled by Permittees)	II.T (Access and Information)
II.Q and II.Q.1	Other Laws, Regulations, Permits or Approvals	II.Q and II.Q.1 (Other Laws, Regulations, Permits or Approvals)	II.W, II.W.1, II.W.2, and II.W.3 (Other Permits and/or Approvals)
II.R	Reserved	N/A	N/A
II.S	Reserved	II.S (Reserved)	N/A
II.T	Reserved	II.T, II.T.1, II.T.1.a, and II.T.1.b (Waste Minimization)	II.T (Access and Information)
II.U, II.U.1, and II.U.2	Underground Piping	II.U, II.U.1, II.U.1.a, II.U.1.b, II.U.1.c, and II.U.2 (Mapping of Underground Piping)	II.U, II.U.3 and II.U.4 (Mapping of Underground Piping) Note: II.U.1 and II.U.2 are Reserved

Table 3-3 Permit Condition Crosswalk

Permit Conditions in Rev. 9A	Permit Condition Title	Permit Conditions in Rev. 9	Permit Conditions in Rev. 8C
II.V and II.V.1	Marking of Underground Piping	II.V and II.V.1 (Marking of Underground Piping)	II.V (Marking of Underground Piping)
II.W	Reserved	II.W (Reserved)	N/A
II.X, II.X.1, II.X.1.(a-d), II.X.1.d.i, II.X.1.e, II.X.1.e.(i-v), II.X.1.(f-i), II.X.2, and II.X.2.(a-e)	Inspections	II.X, II.X.1, II.X.1.a, II.X.1.b, II.X.1.c, II.X.1.c.i, II.X.1.c.ii, II.X.1.d, II.X.1.d.(i-v), II.X.1.(e-h), II.X.2, and II.X.2.(a-e) (Inspections)	II.O, II.O.1, II.O.1.(a-b), II.O.1.c, II.O.1.c.(i-v), II.O.2, and II.O.3 (General Inspection Requirements)
II.X.3, II.X.3.a, II.X.3.b, and II.X.4	Inspection Records	II.X.3, II.X.3.a, II.X.3.b, and II.X.4 (Inspection Records)	N/A
II.Y, II.Y.1, II.Y.1.(a-g), II.Y.2, II.Y.2.a, II.Y.2.a.(i-iv), II.Y.2.b, II.Y.2.b.(i-ii), II.Y.2.c, II.Y.2.c.(i-iii), II.Y.2.d, II.Y.2.d.(i-iii), II.Y.3, II.Y.3.a, II.Y.3.a.(i-iii), II.Y.3.b, II.Y.3.b.(i-iii), II.Y.3.c, and II.Y.3.d	Corrective Action	II.Y, II.Y.1, II.Y.1.(a-g), II.Y.2, II.Y.2.a, II.Y.2.a.(i-iv), II.Y.2.b, II.Y.2.b.i, II.Y.2.b.ii, II.Y.2.c, II.Y.2.c.(i-iii), II.Y.2.d, II.Y.2.d.(i-iii), II.Y.3, II.Y.3.a, II.Y.3.(i-iv), II.Y.3.b, II.Y.3.b.(i-iii), II.Y.3.c, and II.Y.3.d (Corrective Action)	II.Y, II.Y.1, II.Y.1.(a-g), II.Y.2, II.Y.2.a, II.Y.2.a.(i-iv), II.Y.2.b, II.Y.2.b.(i-ii), II.Y.2.c, II.Y.2.c.(i-iii), II.Y.2.d, II.Y.2.d.(i-iii), II.Y.3, II.Y.3.a, II.Y.3.a.(i-iii), and II.Y.3.b (Corrective Action)
II.Z	Air Emission Standards for Process Vents	N/A	II.AA (Air Emission Standards for Process Vents)
II.AA	Air Emission Standards for Equipment Leaks	N/A	II.BB (Air Emission Standards for Equipment Leaks)
II.BB	Air Emission Standards for Tanks, Surface Impoundments, and Containers	N/A	II.CC (Air Emission Standards for Tanks, Surface Impoundments, and Containers)

This page intentionally left blank.

3.5.5 Permit Attachment Revisions

Hanford Site-wide Permit Attachments support the standard permit conditions. The attachments are applicable to all the unit groups included in the permit. The following attachments are explained below and included in the draft Rev. 9A Permit renewal:

Attachment 1: The attachment includes a link to the HFFACO, also known as the TPA.

Attachment 2: The *Hanford Facility Permit Legal Description and Operating Boundary* is included as Attachment 2. The revisions to Attachment 2 include updates to the legal description and operating boundary at the Hanford Site. Specific revisions include the addition of an introduction to the attachment, an update to the parcels within the operating boundary, and updated language to the Hanford Switching Station.

Attachment 3: Attachment 3, *Security*, was updated in a 2019 Class 2 permit modification (8C.2019.1F) in the Rev. 8C Permit. The draft Rev. 9A Permit renewal includes the current Attachment 3.

Attachment 4: In 2013, the Permittees transmitted a Class 2 permit modification of the Rev. 8C Permit, to Ecology providing updates to Attachment 4, *Hanford Emergency Management Plan*, (DOE/RL-94-02). Ecology reclassified the permit modification to a Class 3 permit modification and held workshops to discuss the submittal and deficiencies within Attachment 4 and unit-specific Contingency Plans. Ecology and the Permittees developed a template for Contingency Plans for the current Rev. 8C Permit and for the draft Rev. 9A Permit renewal. The second portion of the Class 3 permit modification was held in 2020 8C.2019.2D and issued 8C.2020.5F. Attachment 4 for the draft Rev. 9A Permit is consistent with the document that is currently effective in Rev. 8C Permit.

Attachment 4A: The *Building Emergency Directors/Building Wardens* attachment includes the building emergency directors and building wardens for each facility on the Hanford Site. The version included in the Rev. 9A Permit will not reflect the most current list as it is updated often. For the most current list, reference the Rev. 8C Permit.

Attachment 5: The *Hanford Facility Personnel Training Program* attachment has been updated to reflect enforceable training requirements as they relate to the Hanford Site. Specifically, it outlines the Hanford-specific training the Permittees are required to take, as well as the training requirements outlined in WAC 173-303. Attachment 5 also includes details regarding the qualification of personnel.

Attachment 6: The *Recordkeeping and Reports* attachment includes requirements for notifications and submittals to Ecology as it relates to updated standard permit conditions. The updates include revised standard permit conditions and reporting and recordkeeping requirements.

Attachment 7: This attachment is reserved in the draft Rev. 9A Permit as the requirements previously included in the attachment have been met by the Permittees.

Attachment 8: The *Inspection and Training Plan for Groundwater Monitoring Wells* attachment was updated in a 2020 Class 2 permit modification (8C.2020.2F) in the Rev. 8C Permit. The draft Rev. 9A Permit attachment reflects the current Attachment 8.

Attachment 9: The *Permit Applicability Matrix* attachment includes the standard permit conditions and the applicability of areas on the Hanford Site as they relate to the requirements in the conditions. Attachment 9 was updated to reflect revised standard permit conditions and to remove the unit-specific conditions.

Attachment 10: The *Strategy for Handling and Disposing of Purgewater at the Hanford Site* attachment was updated to remove the CERCLA references and requirements. The attachment only focuses on the RCRA requirements to manage purgewater. Ecology made the decision to retain Attachment 10 because staff felt that the information included in the document was still relevant to the permit, but the CERCLA information needed to be removed. The attachment now only includes information related to RCRA management of purgewater.

Attachment 11: The *Groundwater Monitoring Quality Assurance Project Plan and Sampling Protocol* was created to address multiple Quality Assurance Project Plans (QAPjPs) in support of unit-specific GWMPs. It is a new attachment to the Hanford Site-wide Permit.

3.5.6 Environmental Protection Agency Recommendations and Public Comment Responses

Following the proposed 2012 draft Rev. 9 Permit renewal, Ecology received over 5,000 comments from the public, Tribal Nations, and the Permittees. In addition, EPA, and Ecology's HWTR Program also provided input and recommendations on a path forward to NWP. The Response to Comments document that is transmitted with the Hanford Site-wide Permit, Rev. 9A Renewal responds to all public, Tribal Nation, and Permittee comments. The recommendations received from EPA and Ecology's HWTR program staff are included in the CAPs as Conceptual Agreements. The agreements are on file in Ecology's Administrative Record and are not included in the overall Response to Comments document.

4.0 PROCEDURES FOR REACHING A FINAL DECISION ON THE DRAFT PERMIT MODIFICATION

The Washington State Dangerous Waste Regulations in WAC 173-303-830 describe the types of changes or modifications that may be made to a Dangerous Waste Permit issued by Ecology.

This draft permit modification was prepared according to the procedures in WAC 173-303-840(2). As required by WAC 173-303-840(3)(d), draft permits issued by Ecology have at least a 45-day public comment period. For the Rev. 9A Permit renewal, we are holding a 120-day public comment period. The public comment period for this draft permit will be June 29, 2026, through October 27, 2026.

How to Comment

Please submit comments by **October 27, 2026**. Electronically eComments link: https://ecology.commentinput.com/?id=5DsM9EcjB (preferred)

or deliver to:

Daina McFadden
Washington State Department of Ecology
3100 Port of Benton Boulevard
Richland, WA 99354

E-mail address: Hanford@ecy.wa.gov

Comments must be post-marked, received by e-mail, or hand-delivered no later than close of business (5:00 p.m. PST) October, 27, 2026.

Ecology will consider and respond to all written comments on this draft permit modification that are submitted by the October 27, 2026, deadline. At the completion of the 120-day public comment period Ecology will make a final permitting decision. If the final decision is to issue the permit, Ecology will issue a final permit for 9A.2026.1D to the Permittees, that will become effective 30 days after the issuance date. If the final decision includes substantial changes to the draft permit modification because of public comment, Ecology will consider initiating a new public comment period.

4.1 Public Hearings

Ecology has scheduled several opportunities for public information and involvement for the Rev. 9A Permit renewal. For schedule and locations, visit the Ecology public comment period website at: https://ecology.wa.gov/waste-toxics/nuclear-waste/public-involvement

To request additional hearings or for more information contact:

Daina McFadden
Washington State Department of Ecology
(509) 372-7950
E-mail address: hanford@ecy.wa.gov

Ecology will also issue a Response to Comments document upon issuance of the final permit. The final permit modification may be appealed within 30 days after issuance. If there is no appeal, the permit will be effective 30 days following issuance.

Copies of the Rev. 9A Permit renewal 9A.2026.1D are available for review at the Hanford Public Information Repositories locations listed below.

For additional information call (509) 372-7950 or e-mail hanford@ecy.wa.gov

4.2 Hanford Public Information Repositories and Administrative Records

Richland, Washington

Washington State Department of Ecology
Nuclear Waste Program Resource Center
3100 Port of Benton Blvd.
Richland, WA 99354
(509) 372-7950

U.S. Department of Energy
Administrative Record
https://pdw.hanford.gov

Richland Public Library
955 Northgate Dr.
Richland, WA 99354
509-375-7443
Email: doe.reading.room@pnnl.gov

Other Locations:

Portland

Portland State University
Branford Price Millar Library
1875 Southwest Park Avenue
Portland, OR 97201
(503) 725-4542

Spokane

Gonzaga University
Foley Center
502 East Boone Avenue
Spokane, WA 99258
(509) 313-6110

Seattle

University of Washington Suzzallo Library
P.O. Box 352900
4000 15th Avenue Northeast
Seattle, WA 98195
(206) 543-5597

Information on the proposed permit modification is also available online at http://www.ecy.wa.gov/programs/nwp/commentperiods.htm. If special accommodations are needed for public comment, contact Ecology's NWP at (509) 372-7950 or hanford@ecy.wa.gov.

5.0 STATE ENVIRONMENTAL PROTECTION ACT DETERMINATION

The SEPA requires state agencies like Ecology to use concise, high quality environmental documents and information in making decisions [WAC 173-303-650(1)]. An agency may use environmental documents that have previously been prepared in order to evaluate proposed actions, alternatives, or environmental impacts [WAC 197-11-600(2)]. Ecology issued a SEPA Determination of Significance and Notice of Adoption to support Ecology's permit decision on Rev. 9A Site-wide Permit Renewal. The Determination of Significance/Notice of Adoption has been posted to the Statewide SEPA Register. A link to view the document is included on the Draft Hanford Dangerous Waste Rev. 9A page at:
https://fortress.wa.gov/ecy/nwp/permitting/hdwp/rev/9A.2026.1D/index.html.

6.0 REFERENCES

04-OES-0046, Hanford Facility Resource Conservation and Recovery Act (RCRA) Permit Renewal, U.S. Department of Energy, Richland, WA 99352

09-ESQ-506, 2009, The Washington State Department of Ecology's (Ecology) Determination for the Grout Treatment Facility, Washington State Department of Ecology, Richland, WA 99352

10 CFR 20.1003, Energy, Standards for Protection Against Radiation, General Provisions, Code of Federal Regulations, as amended.

13-NWP-054, 2013, *Certification Required for Class 2 and Class 3 Modifications to Dangerous Waste Permits*, Washington State Department of Ecology, Richland, WA 99352

17-ECD-0050 REISSUE, 2017, *Submittal of Land Disposal Restriction Treatability Variance Petition for Hanford Tank Waste (24590-WTP-RPT-ENV-03-003, Rev. 2)*: reissued due to omission of certification signature in electronic distribution

19-NWP-165, 2019, *Approval of Land Disposal Restriction Treatability Variance Petition for Hanford Tank Waste*, Washington State Department of Ecology, Richland, WA 99352

21-NWP-132, 2021, *Dangerous Waste Compliance Inspection on March 31, 2021, at the Central Waste Complex (CWC) and Waste Receiving and Processing Facility (WRAP), RCRA Site ID: WA7890008967, Nuclear Waste Program (NWP) Compliance Index No.: 21.736 and 21.737*, Washington State Department of Ecology, Richland, WA 99352

22-NWP-149, *Tank Waste Closure Performance Standards and Criteria for Use in Closure Plans for Unit Groups that Handle Tank Waste or its Components in Support of the Hanford Facility Resource Conservation and Recovery Act Permit, Dangerous Waste Portion, Revision 9, for the Treatment, Storage, and Disposal of Dangerous Waste (Site-wide Permit WA7890008967, Rev. 9)*, Washington State Department of Ecology, Richland, WA 99352

40 CFR 268.44(h), *Protection of Environment, Environmental Protection Agency, Solid Wastes*, *Variance from a treatment standard,* Code of Federal Regulations, as amended.

40 CFR 271.19, *Protection of Environment, Environmental Protection Agency, Variance from a treatment standard, Solid Wastes*, Code of Federal Regulations, as amended.

Chapter 70A.300 Revised Code of Washington the Hazardous Waste Management Act

DOE/RL-94-02, *Hanford Emergency Management Plan*, U.S. Department of Energy, Richland, WA 99352

PCN-221T-SFP-2024-01, Parts I & II (Standard & General Facility Conditions), Attachment 9 (Permit Applicability Matrix), and Part V, Closure Unit CUG-37 (221-T Sand Filter Pad), U.S. Department of Energy, Richland, WA 99352

Publication 95-402, 2013, Dangerous Waste Permit Application Requirements, Washington State Department of Ecology, Richland, WA 99352

Publication 94-111, Guidance for Clean Closure of Dangerous Waste Units and Facilities, Washington State Department of Ecology, Richland, WA 99352

Resource Conservation and Recovery Act of 1976, 42 U.S.C. 6901, et seq.

RPP-23403, Single-Shell Tank Component Closure Data Quality Objectives, U.S. Department of Energy, Richland, WA 99352

Washington v. Chu, Case No. 08-5085-FVS Consent Decree signed in 2010, State of Washington

WAC 173-303, *Dangerous Waste Regulations*, Washington Administrative Code, as amended.

-303-040, *Definitions*

-303-140, *Land disposal restrictions*

-303-300, *General waste analysis*

-303-310, *Security*

-303-320, *General Inspection*

-303-330, *Personnel training*

-303-335, *Construction quality assurance program*

-303-340, *Preparedness and prevention*

-303-350, *Contingency plan and emergency procedures*

-303-360, *Emergencies*

-303-380, *Facility recordkeeping*

-303-395, *Other general requirements*

-303-610, *Closure and Post-Closure*

-303-630, *Use and management of containers*

-303-640, *Tank Systems*

-303-645, *Releases from Regulated Units*

-303-646, *Corrective Action*

-303-650, *Surface impoundments*

-303-655, *Land treatment*

-303-660, *Waste piles*

-303-665, *Landfills*

-303-670, *Incinerators*

-303-675, *Drip pads*

-303-680, *Miscellaneous units*

-303-690, *Air emission standards for process vents*

-303-691, *Air emission standards for equipment leaks*

-303-692, *Air emission standards for tanks, surface impoundments, and containers*

-303-695, *Containment buildings*

-303-803, *Permit application requirements*

-303-806, *Final Facility Permits*

-303-810, *General permit conditions*

-303-815, *Facility-specific permit conditions*

-303-830, *Permit Changes*

-303-840, *Procedures for decision making*

WAC 173-340, *Model Toxics Control Act Cleanup Regulations*, *Washington Administrative Code*, as amended.

-340-700, *Overview of cleanup standards*

-340-702, *General policies*

-340-703, *Selection of indicator hazardous substances*

-340-704, *Use of Method A*

-340-705, *Use of Method B*

-340-706, *Use of Method C*

-340-707, *Analytical considerations*

-340-708, *Human health risk assessment procedures*

-340-709, *Methods for defining background concentrations*

-340-710, *Applicable local, state, and federal laws*

-340-720, *Groundwater cleanup standards*

-340-730, *Surface water cleanup standards*

-340-740, *Unrestricted land use soil cleanup standards*

-340-747, *Deriving soil concentrations for groundwater protection*

-340-750, *Cleanup standards to protect air quality*

-340-760, *Sediment cleanup standards*