

**Permit Modification  
of the Dangerous Waste Portion, Revision 8C,  
of the Resource Conservation and Recovery Act Permit  
for the Treatment, Storage, and Disposal of  
Dangerous Waste, Part III, Operating Unit Group 10  
(WA7890008967)  
Waste Treatment and Immobilization Plant**

**Responsiveness Summary**



DEPARTMENT OF  
**ECOLOGY**  
State of Washington

**Department of Ecology  
Nuclear Waste Program  
3100 Port of Benton Boulevard  
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# Responsiveness Summary

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## Summary of Waste Treatment and Immobilization Plant Permit Modification

The Washington State Department of Ecology (Ecology) prepared a draft permit modification that incorporates new and modified design information for the *Hanford Facility Resource Conservation and Recovery Act (RCRA) Permit, Dangerous Waste Portion, Revision 8C, for the Treatment, Storage, and Disposal of Dangerous Waste*, Part III, Operating Unit 10, Waste Treatment and Immobilization Plant, hereafter called the “WTP Permit.”

This permit modification is important because it allows construction of the WTP to continue. The WTP is essential to cleaning up the 53 million gallons of highly radioactive chemical waste currently being stored in underground storage tanks at the Hanford Site.

### The proposed modification included the following design information:

- **Package LAW-034, Revision 0, Tank System Secondary Containment for Low Activity Waste (LAW) ASX Samplers.** LAW Design Package LAW-034 includes the General Arrangement Plan at +48 foot elevation, Secondary Containment Design, Leak Detection in Secondary Containment Systems, Dangerous Waste Permit (DWP) Liner Heights in the LAW Facility, and the Independent Qualified Registered Professional Engineer’s (IQRPE) Integrity Assessment Report for the LAW Autosampling System (ASX).
- **Package PTF-099, Revision 0, Tank System Secondary Containment for Pretreatment Facility (PTF) ASX Samplers.** The PTF Design Package PTF-099 includes the IQRPE Integrity Assessment Report for the ASX secondary containment.

### The following items are also included in this draft modification:

- 24590-WTP-PER-M-08-001 focuses on the Integrity Assessment Program and Schedule for DWP-regulated equipment in the Analytical Laboratory and LAW Facility.
- 24590-WTP-PER-M-08-002 describes the Integrity Assessment Program and Schedule for DWP-regulated equipment in the PTF and High-Level Waste (HLW) Facility.
- Correspondence Control Number 169564 describes the IQRPE Structural Integrity Assessment Report for LAW Secondary Containment.
- 24590-PTF-PER-M-04-0010 addresses the leak detection capability in the PTF.
- 24590-PTF-PER-M-04-0011 addresses the waste removal capability for the PTF.
- 24590-WTP-PCN-ENV-10-002 revises the state permit condition for notifying Ecology of minor nonconformance or construction deficiencies. These deficiencies are from approved designs, plans, and specifications in the construction of critical systems as defined in the Hanford Facility RCRA Permit. The reporting period is changed from five calendar days to seven calendar days.

Technical and regulatory details of the permit modification are provided in the attached Statement of Basis.

## **Public Involvement Actions**

Ecology encouraged public comment on the draft WTP Permit modification during a 45-day public comment period held September 27 through November 11, 2010.

**No comments were received during the 45-day comment period.**

A public notice announcing the comment period was mailed to about 900 interested members of the public. In addition, copies were distributed to members of the public at Hanford Advisory Board meetings. A public announcement legal classified advertisement was placed in the *Tri-City Herald* on September 26, 2010. A notice announcing the start of the comment period was sent to the Hanford Information email list.

The public information repositories located in Richland, Spokane, and Seattle, Washington and Portland, Oregon received the following:

- Public notice.
- Transmittal letter.
- Statement of Basis for the proposed WTP Permit Modification.
- Draft WTP Permit Modification.

## **Attachments**

The following information is attached to show the public involvement activities taken in support of the public comment period:

1. Statement of Basis (included with the entire proposed WTP Permit Modification).
2. Public notice.
3. Public announcement classified advertisement.
4. Notice sent to the Hanford Information email list.
5. Ecology letter documenting the final WTP Permit decision.