



DEPARTMENT OF  
**ECOLOGY**  
State of Washington

## **Response to Comments**

**Modification of the *Hanford Facility*  
*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**  
**Class 3 Modification for Analytical**  
**Laboratory Operations, 8C.2017.4D**  
**December 4, 2017 - January 19, 2018****

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*Summary of a public comment period and responses to comments*

April 2018  
Publication no. 18-05-008

## **PUBLICATION AND CONTACT INFORMATION**

This publication is available on the Department of Ecology's (Ecology) website at <https://fortress.wa.gov/ecy/publications/SummaryPages/1805008.html>

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# **Response to Comments**

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**Modification of the *Hanford Facility 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 Class 3 Modification for Analytical Laboratory Operations, 8C.2017.4D***  
**December 4, 2017 - January 19, 2018**

Department of Ecology  
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## INTRODUCTION

The Washington State Department of Ecology's Nuclear Waste Program (Ecology) manages dangerous waste within the state by writing permits to regulate its treatment, storage, and disposal.

When a new permit or a significant modification to an existing permit is proposed, Ecology, the Permittee, or both hold a public comment period to allow the public to review the change and provide formal feedback. (See [Washington Administrative Code \[WAC\] 173-303-830](#) for types of permit changes.)

This Response to Comments is issued to address public comments received during the comment period held December 4, 2017, through January 19, 2018.

The Response to Comments is the last step before issuing the final permit, and its purpose is to:

- Specify which provisions, if any, of a permit will become effective upon issuance of the final permit, providing reasons for those changes.
- Describe and document public involvement actions.
- List and respond to all significant comments received during the public comment period.

### **This Response to Comments is prepared for:**

Comment period:	Class 3 Modification for the WTP Permit, Analytical Laboratory Operations, 8C.2017.4D, December 4, 2017, through January 19, 2018
Permit:	<i>Hanford Facility Resource Conservation and Recovery Act (RCRA) Permit for the Treatment, Storage, and Disposal of Dangerous Waste, Part III, Operating Unit Group 10 (WA7890008967), Waste Treatment and Immobilization Plant</i>
Permittees	U.S. Department of Energy, Office of River Protection (USDOE-ORP) and Bechtel National Inc. (BNI)
Original issuance date:	September 27, 1994
Effective date:	May 5, 2018

To see more information related to the Hanford Site and nuclear waste in Washington, please visit our website: <https://www.ecology.wa.gov/Waste-Toxics>.

## **REASONS FOR ISSUING THE PERMIT**

The Analytical Laboratory (LAB) will need to be operational to support the Direct Feed Low Activity Waste (DFLAW) configuration at the Waste Treatment Plant (WTP).

The permittees submitted a Class 3 Modification to the WTP Permit which provided operating details specifications for the LAB. Ecology reviewed the supplied documents, drawings, and details to ensure the necessary information was provided to support the operations of the LAB.

Based on the information provided by the permittees and on the comments received during the public comment period, Ecology updated and revised permitting documentation as described below.

Ecology finalized permit conditions to support the proper operation of the LAB. These conditions are located in Permit Conditions III.10.L, Analytical Laboratory Specific Operating Conditions.

Updates to Permit Condition Tables III.10.E.D and III.10.E.P were provided to reflect the current operating information.

Permit Conditions III.10.C.16 for Secondary Containment Devices and corresponding tables were included in this modification for addition into the existing WTP Permit.

Additional revisions needed to support the operations of the LAB in this modification included:

- Chapter 4H, Analytical Laboratory
- Chapter 6A, Inspection Plan
- Chapter 8, Personnel Training
- Part III, WTP Unit Specific Permit Conditions

The current WTP Permit contains design information related to the construction of the LAB. This design information will remain in the WTP Permit until Ecology has confirmed that the construction of the LAB is certified complete.

## **PUBLIC INVOLVEMENT ACTIONS**

Ecology and the Permittees encouraged public comment on the second portion of the Analytical Laboratory Operations Class 3 modification (8C.2017.4D) during a 45-day public comment period held December 4, 2017, through January 19, 2018.

Ecology took the following actions to notify the public:

- Mailed a public notice announcing the comment period to 1,389 members of the public.
- Distributed copies of the public notice to members of the public at Hanford Advisory Board meetings.
- Placed a public announcement legal classified advertisement in the *Tri-City Herald* on December 3, 2017.
- Emailed notices announcing the start of the comment period to the [Hanford-Info email list](#), which has 1,430 recipients.

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

- Focus Sheet
- Transmittal letter
- Statement of Basis for the proposed Analytical Laboratory Operations Permit Modification 8C.2017.4D
- Draft Analytical Laboratory Operations Permit Modification 8C.2017.4D

The following public notices for this comment period are in [Appendix A](#) of this document:

1. Focus Sheet
2. Statement of basis
3. Classified advertisement in the *Tri-City Herald*
4. Notices sent to the Hanford-Info email list

## LIST OF COMMENTERS

The table below lists the names of organizations or individuals who submitted a comment on the Analytical Laboratory Operations Permit Modification (8C.2017.4D). The comments and responses are in [Attachment 1](#).

Commenter	Organization
Mike Conlan	Citizen
Anonymous	Citizen
Confederated Tribes and Bands of the Yakama Nation	Tribal
Confederated Tribes of the Umatilla Indian Reservation	Tribal

## **ATTACHMENT 1: COMMENTS AND RESPONSES**

### **Description of Comments:**

Ecology accepted comments from December 4, 2017, through January 19, 2018. This section provides summary of comments that we received during the public comment period and our responses, as required by RCW 34.05.325(6)(a)(iii). Comments are grouped by individual, and each comment is addressed separately.

## Comment From: Mike Conlan

I-1-1

1. Remove all nuclear waste, 2. Do not allow anymore nuclear waste into the facility, 3. Replace all the single storage tanks, 4. Stop all the nuclear leakage entering the Columbia River

## Response To: Mike Conlan

I-1-1

Ecology is working to ensure that long-term storage, treatment and disposal of the waste is protective of human health and the environment. The proposed permit changes are not to allow new waste, but to better manage the waste already at Hanford. Single-shell tanks are not in the scope of this comment period. Ecology does agree the tanks pose a threat. We believe a better approach to addressing it is to remove the waste from the single-shell tanks and put it in the compliant double-shell tanks to prepare for eventual treatment in the Waste Treatment Plant now being built. The construction and operation of the Analytical Laboratory is a positive step to eventual treatment of tank waste currently stored at Hanford. Stopping any potential nuclear waste from impacting the Columbia River is not within the scope of the WTP Permit. Prevention of groundwater and surface water impacts are addressed in operations associated with other units.

## Comment From: Anonymous Citizen

I-2-1

This Permit Modification Accepts a Blanket Reduction in Secondary Containment that is not appropriate and was not included in the prior public review comment period. Draft Permit Condition III.10.C.16 creates a loophole for secondary containment by adding exceptions for "special" protective coating systems approved without documentation by the Department of Ecology. The proposed new conditions are shown in red text on the following pages.

- Ecology does not employ suitably qualified chemical process engineers with the skill or experience to evaluate coatings. In addition the Independent Qualified Registered Professional Engineer (IQPRE) reports supplied to date by Bechtel have been superficial - failing to actually review the ranges of compositions used for materials selection.
- The addition of permit condition III.10.C.16 was not part of the original Analytical Laboratory public comment period. It was absent from letter 17-ECD-0041, and therefore has not had an adequate public review. (This creates an appearance that it was slipped in to this package to avoid a complete review.)
- The secondary containment loophole request for "equivalent devices" was included in letter 17-ECD-0070, dated November 24, 2017. Letter 17-ECD-0070 was not made available for public review. Specifically, DOE and Bechtel requested that in

specified Waste Treatment and Immobilization Plant facilities, "special protective coating systems, including special protective coatings and coverings, are approved for use in lieu of other secondary containment systems." This statement does not enhance, but rather substitutes coatings for actual secondary containment.

- In letter 17-ECD-0070, DOE indicates that Ecology has pre-approved special protective coatings and coverings instead of secondary containment devices in the LAW Facility, High-Level Waste Facility, and the Pretreatment Facility. The text states that the information in the package has already "been agreed to" between the Permittees and Washington State Department of Ecology. The agreement described in this letter was made without public comment, and it is a significant approval that is far beyond the scope of the analytical laboratory permit modification. The normal secondary containment devices are stainless steel liners, vaults, and double walled tanks. A "protective coating," easily scratched or damaged, is not even close in safety or durability.
- The permit change package (see red text below) states that the basis for the coatings to be used in-lieu-of secondary containment is a document in Appendix 7.7 of the permit, Engineering Specification for Field Applied Special Protective Coatings for Secondary Containment Areas. The phrase "in lieu of" is not used in this specification. Rather, this specification, 24590-WTP-3PS-AFPS-T0006, Rev 3, is specifically intended for use as a design feature as part of genuinely designed secondary containment areas. It is not a specification for something that is to be used instead of or in lieu of secondary containment.
- Table III.10.C.B, Secondary Containment Locations Approved for Equivalent Device Use (included in the proposed permit conditions) provides no basis or reference to show how Ecology came to the conclusion that a coating is a proper secondary containment device, or how Ecology came to the conclusion that the coatings are durable enough in the radiochemical environment to survive intact for the life of the plant. Ecology should be reminded that the Purex plant at Hanford was shut down based on secondary containment that was determined to be inadequate by the Department of Ecology. Ecology needs to apply the same rigor to WTP, which is massively larger than Purex and is to handle a much wider variety and quantity of hazardous chemicals. The areas listed in Table III.10.B include vessels with hazardous, contaminated, solutions whose composition ranges are not listed.
- Bechtel and AECOM have already paid \$125 million in order to prevent being prosecuted for fraud including for shoddy designs and inadequate materials of construction. Ecology should not accept promises or specifications to be implemented elsewhere in the future as a basis for using coatings as containment.
- The original materials submitted for public comment (Letter 17-ECD-0041) indicated that in the laboratory design, "coatings are provided to support the cleanup and decontamination of a potential spill and are not designed to provide secondary containment." The addition of a permit condition allowing coatings to function in lieu of genuine secondary containment is contrary to the original material submitted to the public.

#### I-2-2

The Change Log (File CH4H.pdf) supplied with this permit modification does not include the addition of the new coatings permit condition general to WTP. The omission of the new permit condition III.10.C.16 from the change log file is another indication that the substitute secondary containment loophole was added in haste.

#### I-2-3

The Range of EMF Compositions to be Analyzed in the Laboratory Remains Uncertain. In the response to comments (Publication 17-05-013), Ecology stated that "the concern that EMF will have novel compositions is not accurate". Despite Ecology's dismissal of flow sheet uncertainty- DOE noted that the sequence of additions "dramatically influences" the final composition for the EMF Bottoms. A wide range of compositions was checked against the Land Disposal Restrictions for grouted EMF Bottoms (see Letter 17-WSC-0070), and ORP noted that further testing is needed with actual EMF bottom concentrate from a test platform. Were corrosion and coating evaluations performed on as broad a range of compositions? The designs are NOT complete until the EMF development test work is complete, with requisite QA that verifies the ranges of compositions evaluated are appropriate. I believe Ecology's confidence that the chemical composition ranges and that the chemical species are known is not well founded.

#### I-2-4

##### **Manual Transfer of Samples to the Laboratory is Contrary to ALARA Principles**

In the response to comments (Publication 17-05-013) Ecology noted that approximately 30% of the samples analyzed at the WTP Analytical Lab are expected to be received from EMF. "The EMF samples will be manually transferred to the Analytical Lab in a shielded container for safe handling (e.g., ALARA)." The decision to not use the automated sample delivery system to deliver samples from the EMF to the laboratory is what is contrary to ALARA. Samples from LAW use an automated system, which keeps the waste away from workers. Where is the analysis that the design authority used to allow repeated doses to workers? Was the substitution of manual transfers approved by Nuclear Safety? Where is the ALARA in Design review? 30% of the laboratory samples is a lot. The manual operations to package and transfer samples in a shielded container is contrary to ALARA for radioactivity and for preventing chemical exposures.

#### I-2-5

##### **Unknown Future Designs Do Exist that Affect Equipment Design and Operation**

In the response to comments (Publication 17-05-013) Ecology stated that neither DOE nor Ecology are aware of any unknown future designs which would change the scope of samples analyzed by the Analytical Laboratory. This is surprising. The response to comments was published in November of 2017, yet the Acting Assistant Secretary for Environmental Management had already proposed a future design for Tank Side Cesium Removal, and ORP and Ecology were aware of that. The Acting Assistant Secretary for Environmental Management referred to new cesium removal technology in his September 20, 2017 letter to Ms. Maia Bellon, and subsequently discussed this in person. Tank Side Cesium Removal is a concept with an unknown future design that will change the flow sheet.

I-2-6

### **The LAWPS and EMF Facilities May Operate Far Longer Than Advertised**

In the response to comments (Publication 17-05-013) Ecology notes that the current DFLAW configuration does not allow EMF to operate when PT and HLW Facilities are in operation. Ecology should note that one of the recommendations from a recent "external" panel of experts was that Tank Side Cesium removal be added and that the LAWPS facility operate for a longer term, "during the life of WTP Operations." This change in approach will affect the demands on the laboratory- and this impact was ignored by the ad hoc, "expert" panel. See RPP-RPT- 60405, sheet iv, making it feasible that DOE would entertain operation of LAWPS and HLW and possibly PT at the same time. When LAWPS operates, EMF operates as part of the same flow sheet.

I-2-7

### **Seismic Qualifications for the Laboratory Have Been Questioned**

The seismic qualification and category for the analytical laboratory has been questioned, in Condition Report 24590-WTP-GCA-MGT-17-01457. I would appreciate if Ecology would not forget that DOE's commitment to the public, through the NEPA Process, and the Tank Closure and Waste Management EIS, is that the Analytical Laboratory is a high level waste facility, and needs to be designed and operated as such from the outset. Operating the lab as a radiological facility only serves to put off the eventual realization that it may not be serviceable when HLW Vitrification becomes operational. The lab has been cheapened and will be misrepresented as meeting the contract requirements when it does NOT meet the EIS commitment to the public.

I-2-8

### **DOE Mismanagement Has Impacts on Safety**

Ecology's lack of interest in DOE's gross mismanagement of the WTP contract was reiterated in Publication 17-05-013. Yet DOE mismanagement has impacts on chemical safety. I would appreciate if you would review the recent report from the Inspector General, DOE-OIG-18-09, Special Report, Management Challenges at the Department of Energy, Fiscal Year 2018. See: <https://energy.gov/sites/prod/files/2017/11/f46/DOE-OIG-18-09.pdf>. This report shows the Inspector General's continued interest in "watching" as the designs/operations descend into chaos. Ecology is giving way before the failures, and as a result Ecology is a participant in those failures and not a protector of the environment or the people who work here. What the OIG is "watching" includes Analytical Laboratory design documents that continue to be published and cancelled without appropriate safety evaluation. See Condition Reports 24590-WTP-GCAMGT- 17-01835 and 24590-WTP-GCA-MGT-17-01837, dated December 14, 2017. This is not a new issue. Bechtel paid a monetary remedy of \$800,000 in 2015 for the same failure.

Further, Condition Report 24590-WTP-GCA-MGT-17-01834 shows that test data used to derive erosion limits for LAW vessels was "not directly applicable to the waste streams that are expected to be treated at WTP and/or did not use the materials of construction at WTP." DOE and Bechtel have allowed this problem to languish for years, as it was previously identified in the LAW Design and Operability Review Report in 2014. And I

believe ORP has approved drains beneath acid and caustic chemical supply tanks in the HLW Facility that lead to the same secondary containment vessel - creating the precursor condition for an explosion if the solutions are mixed. The excuse for this was that a leak from one of these vessels would be neutralized using administrative controls. This is not "safe by design" and there is no recovery for a common cause accident that would cause both vessels to leak.

I would appreciate if Ecology would reject this permit modification, and especially disapprove of the use of coatings in lieu of secondary containment.

## **Response To: Anonymous Citizen**

I-2-1

Ecology added proposed permit conditions in the draft LAB Operating Permit through package WTP-001 to incorporate previous approvals from the agency to the Permittees to use equivalent secondary containment material. These approvals were made in the past through letters in 2004, 2005, 2010 and 2011. In 2004, Ecology provided 24590-WTP-3PS-AFPS-T0006 for public review, titled "Engineering Specification for Field Applied Special Protective Coatings for Secondary Containment Areas" which outlined the use of special protective coatings in the WTP Facilities. Each time these requirements were made by the Permittee for specific areas within the WTP, Ecology felt confident in the use of these materials to meet the requirement for secondary containment, per WAC 173-303-640(4)(g). It is Ecology's expectation that the IQRPE is provided the documentation he/she deems necessary and appropriate for a thorough review to make his/her determination regarding materials of construction under review. When the IQRPE report is written, Ecology expects the IQRPE to have responsibility for the complete technical review and certification that is the basis for the report. As a requirement of WAC 173-303-640(3) and Permit Condition III.10.E.9.b.i Ecology relies on this report as the final independent review prior to acceptance into the WTP Permit. Prior to operations of the facility all calculation, drawings, technical information and permitting documents will be verified and finalized. The WAC requires that dangerous waste permit secondary containment areas be provided with an impermeable coating that is compatible with the stored waste in order to prevent the migration of waste onto the concrete.

Ecology employs highly educated and experienced engineers who evaluate the appropriate materials of construction including the use of special coatings, as well as draft WTP Permit documents and drawings before they are incorporated into the WTP Permit. In addition, Ecology reviews draft IQRPE reports and provides comments to the Permittee. Ecology does not believe the IQRPE reports are superficial in nature and if Ecology had concerns with the detail of the review, we provided those to the Permittees in our review. In accordance with WAC 173-303-830, Ecology has the right to include new permit condition language in the second portion of a Class 3 modification.

Letter 17-ECD-0070 is not available for public review and comment, but is publicly available through the Administrative Record. What was available to the public during the LAB Operating permit modification, was draft permit conditions that reflect the use of special protective coatings. The use of special protective coatings were also available to the

public in past permit modifications.

Ecology did not include the basis of the decision made to provide the exception in the proposed permit conditions. The basis was included in draft documents provided to the public in previous comment periods or letters sent to the Permittees when exceptions were granted, however, that information is available in the Hanford Administrative Record and is publicly available.

As Ecology has stated in previous Response to Comment documents, we are not party to any contractual agreement or settlements. Concerns about these issues would be best discussed directly with the Permittees.

#### I-2-2

The Change Control Log for WTP Modifications is not updated for draft permit modifications. The Change Control Log will be updated with the approved final permit modification along with the associated modification number and date.

#### I-2-3

Corrosion and coating evaluations have been performed to determine the best material for the vessels and liners within each facility at WTP. The Lab vessels are made of 6% Mo alloy due to the anticipated high Halide levels in the waste stream. 6% Mo alloy is highly resistant to corrosion, especially chloride corrosion. 6% Mo alloy is also much stronger than austenitic stainless steels. Additionally, integrity assessments are scheduled to be performed on the vessels in order to provide assurance that corrosion is not occurring.

#### I-2-4

Transferring samples in a shielded container is part of ALARA radiation safety principles in that the samples are carried in a shielded device, thus reducing radiation exposure to workers. The safety of the shielded containers has been evaluated and it has been determined that they will provide the necessary shielding to any workers trained to handle and manually transport them.

#### I-2-5

Tank Side Cesium Removal is not part of this permit modification. Additionally, the Lab is designed as a process laboratory which will support the LAW, HLW, PT, and EMF processes. Tank Side Cesium Removal would not change the characteristics of the samples being analyzed by the Lab. There are currently no plans to analyze samples from the Tank Side Cesium Removal process. The feed waste coming from Tank Farms would still have to meet the WTP acceptance criteria.

#### I-2-6

The recommendations of that expert panel are currently just recommendations, and at this time not applicable to the permitting that is currently taking place to support EMF and the DFLAW configuration. The current DFLAW configuration does not allow EMF to operate when HLW and PT facilities are in operation. The design and expected operating life span of the Analytical Lab can adequately support the needs of operating in the DFLAW configuration and the anticipated Baseline configuration of the Waste Treatment Plant.

I-2-7

The Washington State Department of Ecology regulates management of dangerous waste under Washington Administrative Code 173-303. Ecology does not have regulatory authority for management of nuclear operations or the radiological fraction of mixed waste. This authority is maintained by the Department of Energy under the Atomic Energy Act. The proposed Lab Operating Permit Modification is based on the DFLAW configuration for WTP. The hot cells and RLD-VSL-00165 will remain in standby until the Permittees are ready to operate WTP in the Baseline configuration. The Permittees have submitted a Permit Modification which included design changes to allow for systems and tanks to be reconfigured to allow for operations of the Lab in the DFLAW configuration. Prior to implementing the Baseline configuration, the Permittees will be required to modify the Lab Operating Permit according to Appendix I of WAC 173-303-830. The Department of Energy evaluated the DFLAW concept in the Final Tank Closure and Waste Management EIS and concluded that it was bounded by the analysis in Alternative 2B.

I-2-8

Issues identified concerning the Bechtel National Inc. (BNI) contract with the Department of Energy or the DOE Office of Inspector General are outside the scope of this modification. Ecology is not involved in the Department of Energy's oversight of their contract with BNI, nor it's interactions with DOE Office of Inspector General.

## **Comment From: Confederated Tribes and Bands of the Yakama Nation**

T-1-1

In the Modification of the Hanford Facility Resource Conservation and Recovery Act Permit for the Treatment, Storage, and Disposal of Dangerous Waste, Part III, Operating Unit Group 10 (WA7890008967) Analytical Laboratory Operations, 24590-LAB-PCN-ENV-16-002 July 3, 2017, through September 1, 2017, the response comments summary (dated November 2017; Publication no. 17-05-013) states facility modifications are planned to integrate LAB with EMF (i.e., installing new valving to isolate RLD-VSL-00164 FROM RLD-VSL-00165). Reader was not able to identify this modification in Ecology permit chapters. Please clarify where this mod is discussed within the draft permit chapters.

T-1-2

It was noted in the response comments that the ASX system is not planned for EMF samples. YN maintains this system is a critical system and should be included as such within Chapter 4 including all necessary details, and the Permit Conditions section III.10.L.13.

T-1-3

YN requests clarification to Ecology's response to YN comment regarding minimum 1% slope design (t-13). While we are concerned about the leak detection, YN's concern with is comment is the potential of buildup/blockage. Clarify how 1% grade slope ensures flow. Additionally, clarify how 1% slope ensures 0.1 gallons per hour leak detection capabilities (i.e., provide reference to calculation documents).

#### T-1-4

YN noted Ecology's comment response to T-1-4 yet did not find much of the requested details within Chapter 4 or Table 4H-1. YN requests Ecology review our previous comment request and include these within the new permit Chapter 4 details.

#### T-1-5

YN noted Ecology's comment response to T-1-24. We remain concerned with heavy equipment used and the soundness of the floor and the associated load-out/waste transfer areas. Please provide the section in the IQRPE's referenced which specifically evaluated the construction designs for the LAB's container storage/waste management areas. Documents listed on Ecology's NWP website (Appendix 11.11: Laboratory Building Independent, Qualified, Registered Professional Engineer (IQRPE) Reports) do not appear to include these areas.

#### T-1-6

YN noted Ecology's comment response T-1-27. However, we were unclear as to what procedures are specifically in place to inspect the containment systems for those vessels which are located in areas not routinely accessible. Clarification within Chapter 6A is requested.

#### T-1-7

YN noted Ecology's comment response to T-1-28 and requests this response be captured within the test of Chapter 4.

#### T-1-8

YN noted Ecology's comment response to T-1-30 and requests this response be captured within the test of Chapter 4 text and tables.

#### T-1-9

YN disagrees with Ecology's choice to delete information on laboratory maintenance and solid waste management and continues to request this information be included. We believe that details as to measures for waste management and acceptance criteria are important to ensure proper disposal.

#### T-1-10

YN noted Ecology's comment response to T-1-32 and requests clarification that there is a reference to location of PFDs in Appendix 11.1 somewhere within Chapter 4.

#### T-1-11

YN noted Ecology's comment response to T-1-36 and requests this response be captured within the test of Chapter 6 text and tables.

#### T-1-12

YN noted Ecology's comment response to T-1-39. YN is concerned that there is no protective coating on the floors of the waste management areas and requests Ecology ensure through Permit conditions that adequate secondary containment remains in place.

T-1-13

YN noted Ecology's comment response to T-1-40, notes that Appendix 11.18 is not available on the Ecology website, and must be viewed on site. Please provide information included in Section 7.1.5 concerning nondestructive examination of sumps.

T-1-14

YN noted Ecology's comment response to T-1-49 and requests identification of the laboratory used by Ecology for analysis of air and water samples from the WTP facilities.

T-1-15

YN noted Ecology's comment response to T-1-52 and requests this information be included in Chapter 4.

T-1-16

YN noted Ecology's comment response to T-1-63 and requests identification of document number of the LAB SAP which identifies analytical sampling methods, sample preservation etc to be used.

T-1-17

YN noted Ecology's comment response to T-1-69. YN requests that future modification to Closure Plans (or other Permit documents) for specific WTP facilities are not linked to modifications for other facilities. This causes unnecessary confusion especially when the document is linked to a Condition that is out for review.

T-1-18

III.10.C.16 Secondary Containment Devices: Proposed conditions do not fully identify the WAC 173-303-640(4) requirements for secondary containment. WAC 173-303-640(4)(b) /-(c/ and (f)) requirements are not captured. Only portions of -(e) have been identified. If the Permit allows for all devices listed under WAC 173-303-640(4)(d), then each device must have specific conditions. YN requests Ecology review Sections III.10.C.16 and III.10.D.6 and edit to included Conditions for missing WAC 173-303-640(4)(b) /-(c/ and (f)) requirements and those for requirements for -(e) which are not captured.

T-1-19

III.10.L.3: Waste Analysis: Clarification is requested as to why WAC 173-303-830(1)(b, c &f) are not cited.

T-1-20

III.10.L.4: Recordkeeping and Reporting: Clarification is requested as to why WAC 173-303-830(1)(g & q) are not cited.

T-1-21

III.10.L.4: Recordkeeping and Reporting: Include tank system integrity assessments by the IQRPE (WAC 173-303-640(2)).

T-1-22

III.10.L.8.a : and III.10.L.16.b: Edit both to include requirements of WAC 173-303-640(6).

T-1-23

III.10.L.11.b: YN requests deletion of last sentence. As written, it means any WTP facility, anytime, not specifically during closure of the LAB.

T-1-24

III.10.L.13: Include the ASX system as a critical system.

T-1-25

III.10.L.15.b: Container Management Standards: Include condition for satellite accumulation areas as regulated under WAC 173-303-200.

T-1-26

III.10.L.16.a.i: Tank System Management Requirements: Clarify why the first conditions is not compliance with WAC 173-303-640(3)(a).

T-1-27

III.10.L.16: Include condition for management of ancillary equipment (WAC 173-303-640(3)(f)).

T-1-28

III.10.L.16: Capture the requirements of WAC 173-303-640(3)(g) within Tank Management Conditions.

T-1-29

III.10.L.16.b.ii: Capture the requirements of WAC 173-303-640(5)(b & d & e) within Tank Operating Conditions.

T-1-30

Clarification is requested as to why there is not a Permit Condition for Compliance Schedule (WAC 173-303-815).

T-1-31

III.10.M: EMF MISCELLANEOUS UNIT SYSTEMS Permit Conditions are well written. YN requests Ecology review the ANALYTICAL LABORATORY SPECIFIC OPERATING CONDITIONS against EMF's conditions format and content, and structure the LAB's Permit Conditions likewise as applicable. EMF's conditions more clearly identify what is required for compliance than LAB's.

T-1-32

General: The overall simplistic or dismissive response comments to those comments submitted by Anonymous Citizen appeared to indicated a lack of effort on Ecology's part to address citizens' concerns (e.g., revised mass balance, sample schedule, corrosion evaluation). It would have been more helpful to the public to extract the information that simply referencing it (e.g., the process chemistry, including fluoride and chloride content, of EMF samples was evaluated in EMF Process Steam Tables (24590-BOF-M3-V17T-00001001 and V17T-00001002). These EMF Process Stream Tables were part of the Class

3 Modification to the WTP Permit for the EMF Secondary Containment.). Please provide additional clarification in your next responsiveness summary.

## **Response To: Confederated Tribes and Bands of the Yakama Nation**

### T-1-1

The details of the modification are not in the text of Chapter 4H. Sections 4H.2.1.2, and 4H.2.1.3 include a brief discussion of how the tank systems operate during both DFLAW and Baseline operations.

### T-1-2

The ASX system is included in Chapter 4H and will be implemented in portions of the WTP. However, the Permittees have determined that the system is not a critical system for the EMF.

### T-1-3

WTP Laboratory personnel will follow each discharge of liquid waste to the drain with flush water as described in Section 4H.2.1.2. In addition, the Lab leak detection capabilities are found in DWP document 24590-LAB-PER-M-04-0001, "LAB Minimum Leak Rate Detection Capabilities for Leak Detection Boxes, Cell Sumps, and Pit Sumps" in Appendix 11.18.

### T-1-4

Ecology acknowledges your concern, however, the deleted text pertained to the analytical operation of the Laboratory and not to the operations in areas of the facility where dangerous waste is managed. Additional detail has been added to Chapter 4H to clarify the two types of laboratories in the Lab facility. Regarding waste feed limits, WTP will not accept wastes with organic concentrations at or above 10 wt% per Chapter 3/3A, WTP Waste Analysis Plan

### T-1-5

The IQRPEs referenced in Appendix 11.11 are for the secondary containment of the tank systems, not the container storage area. The Waste Management Area floor is not designed nor intended to provide secondary containment of materials. No structural integrity assessment was required for the Waste Management Area.

### T-1-6

A description of the inspection procedures for areas not routinely accessible will be supplied to Ecology prior to receipt of dangerous and/or mixed waste in accordance with Permit Condition III.10.C.5.c. Chapter 6, Procedures to Prevent Hazards and Chapter 6A, Inspection Plan will be updated and resubmitted to Ecology for review and approval, prior to receipt of waste.

### T-1-7

Thank you for your comment, response text has been added to Section 4H.2 of Chapter 4H.

T-1-8

Thank you for your comment, response text has been added to Section 4H.2.4 in Chapter 4H.

T-1-9

As discussed in Ecology's response to comments document (publication #17-05-013), comment T-1-31, the details in Section 4H.4, Laboratory Maintenance and Section 4H.5, Solid Waste Management were outside of the scope of the RCRA permit and it was determined that leaving the text in could lead to confusion. How the Analytical Lab manages dangerous and/or mixed waste is clearly detailed throughout Chapter 4H.

T-1-10

Thank you for your comment, text has been revised.

T-1-11

This language is captured in Chapter 6A. Inspections are defined in the Inspection Frequencies Table; weekly is defined as once per calendar week.

T-1-12

The Container Storage Area also known as the Waste Management Area (WMA) is not designed to meet secondary containment requirements, as noted in Chapter 4H. However, the entire floor area is coated with a special protective coating to assist in clean-up and decontamination in the event of a potential spill. Portable secondary containment pallets are used to meet the permit requirements for secondary containment. As outlined in Table 6A-2a of Chapter 6A, Waste Management Areas will be inspected weekly. Ecology will use RCRA inspections of the facility to ensure that secondary containment is used in accordance to WAC 173-303-630.

T-1-13

The reference to Appendix 11.18, was an error, however it is available on the Ecology website. The referenced Section 7.1.5 is found in document 24590-WTP-PER-M-08-001 "Integrity Assessment Program and Schedule for DWP Regulated Equipment in the Analytical Laboratory and Low-Activity Waste Vitrification Facility" in Appendix 7.15 Operating Documents, of the WTP Dangerous Waste Permit. The objective of the NDE measurements is to determine the remaining corrosion and erosion allowances of regulated plant items. Bulges, containment and sumps do not receive dangerous waste unless there is a leak from a tank, miscellaneous unit, piping, or in-line component. For bulges, containment and sumps, non-destructive examinations are to be conducted as part of the integrity assessments only when the operating history reviews indicate that a leak had traveled to and entered these plant items.

T-1-14

Ecology acknowledges your concern, however this specific information is not known at this time and not required to be detailed in the permit. As stated in our previous response, any environmental laboratory that samples air and water quality samples, will need to be accredited by Washington State Department of Ecology.

T-1-15

Details for closure of the Lab are detailed in Chapter 11, Closure Plan. This information is not part of the Chapter 4H scope.

T-1-16

Chapter 3/3A WTP Waste Analysis Plan and the Data Quality Objectives identify the necessary analytical sampling methods. The Analytical Lab itself does not operate under a Sampling Analysis Plan (SAP).

T-1-17

Ecology appreciates your feedback. We will continue to look for opportunities to avoid overlapping comment periods, and to ensure that documents are provided for public review in a manner that is easy to review and understand.

T-1-18

WTP Unit Specific Permit Condition III.10.E.9.b.ii covers the requirements detailed in WAC 173-303-640(4)(b) through (f).

T-1-19

Ecology believes commenter was referring to WAC 173-303-380 and not -830. Permit Condition III.10.L.3.c cites WAC 173-303-380 (1)(a) and (b). Per Permit Condition III.10.D.1.d, the Permittees will maintain documentation in the operating record for each container storage area listed in Permit Table III.10.D.A (as approved/modified pursuant to Permit Condition III.10.D.10), in accordance with WAC 173-303-380.

T-1-20

Ecology believes commenter was referring to WAC 173-303-380 and not -830. Per III.10.D.1.d, The Permittees will maintain documentation in the operating record for each container storage area listed in Permit Table III.10.D.A (as approved/modified pursuant to Permit Condition III.10.D.10), in accordance with WAC 173-303-380.

T-1-21

The comment references WAC 173-303-640(2), this citation is applicable to existing tank systems. All of the tank systems that will support the WTP are considered new tank systems, therefore WAC 173-303-640(3) is the applicable citation for the tanks in the Laboratory. Additionally, see Permit Condition III.10.E.4 for details on required Integrity Assessments for tank systems at the WTP.

T-1-22

WTP Unit Specific Conditions III.10.E Tank Systems are applicable to all Tank Systems in the WTP Facility, therefore conditions III.10.E.5.g, III.10.E.5.i, and III.10.E.6 are applicable to the Tank Systems in the Laboratory.

T-1-23

The sentence was rewritten to read, "The notice of closure may apply to closure of any dangerous waste management units in the Analytical Laboratory, in the WTP Operating Unit Group, or final closure of the remaining Operating Unit Group 10. [WAC 173-303-610(3)(c)]"

T-1-24

The ASX System does not meet the defining criteria of a critical system in the WTP Permit. Therefore it will not be included in the Critical System List in Appendix 2 of the WTP Permit.

T-1-25

General Waste Management Permit Condition III.10.C.2.c states, "All dangerous and/or mixed waste must be managed only in areas authorized for dangerous and/or mixed waste management under the Permit Conditions, except as allowed under WAC 173-303-200. The authorized dangerous and/or mixed waste management areas of the WTP Unit are specified in Conditions III.10.D through III.10.M."

T-1-26

WAC 173-303-640(3)(a) refers to design and installation criteria for new tank systems or components. The regulatory criteria that are applicable to the Tank Systems in the WTP Facility are detail in III.10.E, Tank Systems. The conditions detailed in III.10.L are specific to the operations of the Laboratory Facility.

T-1-27

WAC 173-303-640(3)(f) refers to design and installation criteria for new tank systems or components. These regulatory criteria that are applicable to the Tank Systems in the WTP Facility are detail in III.10.E, Tank Systems. The conditions detailed in III.10.L are specific to the operations of the Laboratory Facility, therefore this is not the correct location for a reference to WAC 173-303-640(3)(f).

T-1-28

WAC 173-303-640(3)(g) refers to design and installation criteria for new tank systems or components. These regulatory criteria that are applicable to the Tank Systems in the WTP Facility are detail in III.10.E, Tank Systems. The conditions detailed in III.10.L are specific to the operations of the Laboratory Facility, therefore this is not the correct location for a reference to WAC 173-303-640(3)(g).

T-1-29

Thank you for your comment, the following permit conditions were added to Permit Condition III.10.L. The Permittees will operate the Analytical Laboratory Tank System to prevent spills and overflows using the controls and practices as required under WAC 173-303-640(5)(b) described in Permit Condition III.10.C.5., and Operating Unit Group 10, Appendix 13.18 of this Permit. [WAC 173-303-640(5)(b), WAC 173-303-806(4)(c)(ix)] For all Analytical Laboratory Unit Systems the Permittees will mark all the unit systems holding dangerous and/or mixed waste with labels or signs to identify the waste contained

in the unit. The labels, or signs, must be legible at a distance of at least fifty (50) feet, and must bear a legend which identifies the waste in a manner which adequately warns employees, emergency response personnel, and the public of the major risk(s) associated with the waste being stored or treated in the unit system(s). [WAC 173-303-640(5)(d), in accordance with WAC 173-303-680(2)] For each Analytical Laboratory Unit System holding dangerous waste which are acutely or chronically toxic by inhalation, the Permittees will operate the system to prevent escape of vapors, fumes, or other emissions into the air. [WAC 173-303-806(4)(i)(i)(B) and WAC 173-303-640(5)(e), in accordance with WAC 173-303-680]

T-1-30

The Permittees have submitted all of the required design elements to ensure the WTP Analytical Operating Permit is complete. There are no longer and open compliance schedule items that apply to the WTP Analytical Laboratory.

T-1-31

Thank you for your comment. We will evaluate and determine if any edits or revisions need to be made.

T-1-32

As required by WAC 173-303-830(4)(c)(vi), Ecology "must consider and respond to all significant written comments received during the sixty-day comment period," for the first part of a Class 3 modification. Ecology strives to provide a detailed technical response to these significant comments. Sometimes we may miss the mark and we do not provide the detailed response the commenter would expect. We walk a fine line of providing detailed technical responses and providing a public-friendly response that is understandable to the general public. If we did not provide enough technical detail in our responses, we did not do so intentionally nor to evade answering the question. In the phased permitting of the Effluent Management Facility (EMF), there will be additional opportunities to provide public comment prior to operations. Additionally, forums such as the Hanford Advisory Board provide an opportunity to ask questions about the EMF. Questions and comments may be submitted in either the Committee meetings or in the larger Hanford Advisory Board meetings.

## **Comment From: Confederated Tribes of the Umatilla Indian Reservation**

T-2-1

Part III, Operating Unit Group 10, Specific Conditions of PMR 8C.2017.4D Page 90, Table III.10.E.D, Fourth Column, test stating: "Table 4H-5 of..." The reference should be to Table 4H-3 of OUG-10, Chapter 4H. Please correct the table entry as appropriate.

T-2-2

Page 90, Table III.10.E.D, Fifth Column, text stating: "RLD-VSL-00164=3180" In the opinion of this reviewer, the indicated entry is an awkward way to show that vessel RLD-VSL-00164 has the capacity of 3180 gallons. An alternative would be to list this entry as follows: 3,180 gal (RLD-VSL-00164), 9,100 gal (RLD-VSL-00165). Please consider the suggested change for the table entry.

T-2-3

Page 133, Table III.10.E.O: General Comment

No primary sumps are listed for the laboratory tank system. The definition of a primary sump from page 9 of this document is: Primary sump: means any pit or reservoir that meets the WAC 173-303-040 definition of "tank," and those troughs/trenches connected to it, that serve to collect dangerous/hazardous waste, deliberately introduced (e.g., from decontamination or treatment activities), for transport to TSD facilities."

From Chapter 4H it appears that the C3 Effluent Vessel Cell (A-B003) and the CS Effluent Vessel Cell (A-B004) are, 'provided with wash rings to facilitate in-cell periodic decontamination or waste removal in the cell. The sloped floors, sumps and sump pumps facilitate liquid collection and removal.' (Page 4H.26, Lines 6 and 7). This statement would suggest that the sumps RLD-SUMP-00041 and RLD-SUMP-00042 would qualify as a primary sump since they will have decontamination waste deliberately introduced and the material will subsequently be routed back to the WTP or LERF/ETF for treatment. Please consider if RLD-SUMP-00041 and RLD-SUMP-00042 qualify as a primary sumps. If not, provide a brief justification for their classification as secondary sumps in the response to this comment.

T-2-4

Page 133, Table III.10.E.P, Column 2, text stating: "1.560, 1.460" Table III.10.E.H show only three significant figures for each of these entries while the indicated text shows four significant figures. Please ensure these entries are consistent. This comment also applies to the first two rows on Page 134.

T-2-5

Page 135 Table III.10.E.P, Final Row, text stating: "RESERVED" It is not apparent why this row was not deleted since all entries are blank. Please consider deleting this row.

T-2-6

Page 317, Lines 11-13, text stating: "Under the DFLA W configuration, the liquid waste will be routed to the WTP Effluent Management Facility (EMF) for treatment." Does the EMF have waste feed requirements that limit the materials that can be processed in the facility? Is there a contingency plan if wastes from the Lab have characteristics that preclude processing in the EMF? Please provide the indicated information in the response to this comment.

T-2-7

Page 317, Line 39, text stating: " ... Waste Analysis Plan Section 3.2.1 ... " The Waste Analysis Plan (WAP) in the Hanford Dangerous Waste Permit (HDW Permit) Rev 8C does not have a Section 3.2.1. There is a Section 3.2.1A in that document. Is this citation an inadvertent reference to Section 3.2.1 of the WAP in the Draft Hanford Dangerous Waste Permit Rev 9? Please ensure the reference correctly indicated the appropriate section of the WAP in Rev 8C of the Hanford Dangerous Waste Permit.

T-2-8

Page 318, Lines 7 to 13 (III.10.L.4.b-c), text stating: "The Permittees will place a copy of each waste profile required by Permit Condition III.10.C.3.d, in the Hanford Facility Operating Record, Analytical Laboratory file required by Permit Condition II.I [WAC 173-303-380(1)(a)]" and "Records and results of waste analysis required by Permit Condition III.10. C. 4 and Chapter 3, Waste Analysis Plan, will be maintained in the Hanford Facility Operating Record, WTP analytical laboratory as required by Permit Condition III [WAC 173-303-380(1)(a)]" The Confederated Tribes of the Umatilla Indian Reservation and other stakeholders should have access to all LAB process records that Ecology does for completing independent assessments. Copies of the waste profiles and waste analysis records and results required by Permit Condition III should be made available to the Confederated Tribes of the Umatilla Indian Reservation and other stakeholders upon request.

T-2-9

Page 318, Lines 16 to 19 (III.10.L.4.e), text stating: "The Permittees will keep summary reports and details of all incidents that require implementation require implementation of the Contingency Plan in the Hanford Facility Operating Record, Analytical Laboratory, according to the requirements of Permit Condition II.A.1. [WAC 173-303-380(1)(d)]" The Confederated Tribes of the Umatilla Indian Reservation and other stakeholders should have access to all LAB summary reports and details of all incidents that Ecology does for completing independent assessments. Copies of the summary reports and details of all incidents that require implementation of the Contingency Plan in the Hanford Facility Operating Record, Analytical Laboratory should be made available to the Confederated Tribes of the Umatilla Indian Reservation and other stakeholders upon request.

T-2-10

Page 319, Lines 4 to 7 (III.10.L.8.a), text stating: "The Permittees will implement the practices specific to the WTP Operating Unit Group as described in Chapter 6A, Inspection Plan, and include the inspection requirements of Chapter 6A in the inspection schedule required by Permit Condition JIG. [WAC 173-303-320]" The Confederated Tribes of the Umatilla Indian Reservation and other stakeholders should be authorized to assist Ecology with LAB inspections. The Confederated Tribes of the Umatilla Indian Reservation would like to participate in inspections alongside Ecology personnel.

T-2-11

Page 319, Line 9, text stating: "... -830(4)" It is not clear to this reviewer that WAC 173-303-830( 4) is the correct reference for retention of inspection logs. Please verify if the indicted reference is correct.

T-2-12

Page 321, Lines 25-27, text stating: "The Permittees will not transfer waste into the analytical laboratory tank systems in excess of the capacity of the tanks as listed in Table III.10.E.D." Table III.10.E.D lists maximum capacities for the laboratory tank systems. To make the indicated text correlate directly with the table, the text should read, "... in excess of the maximum capacity of the tanks ..." Please consider making the indicated change to the text.

T-2-13

Part III, Operating Unit Group 10, Chapter 4H (Analytical Laboratory [LAB]) of PMR 8C.2017.4D Page 4H-7, Lines 4-6, text stating: "The AHL will only operate in the Baseline Configuration. Associated hotcell laboratories, hotcell drain collection vessel (RLD-VSL-00165), and associated components are not operational, but will maintain ventilation, in the Direct Feed LAW (DFLA W) configuration." The term "Baseline Configuration" and "Direct Feed LAW configuration" should be defined in the document before they are used. Please change the text to read: "The AHL will only operate once the HLW process is started (termed the Baseline Configuration). Associated hotcell laboratories, hotcell drain collection vessel (RLD-VSL-00165), and associated components are not operational, but will maintain ventilation, during initial LAW-only processing (termed Direct Feed LAW (DFLAW) configuration)."

T-2-14

Page 4H-7, Line 16, text stating: "The facility is designed to coordinate the management of samples that are outsourced and analyzed at off-site laboratories." If the resulting data from off-site sample analysis is to be included in the Laboratory Information Management System (LIMS) for the Lab, then reference to management of both the samples and the sample data should be included in this sentence. Please change the text to read: "The facility is designed to coordinate the management of samples that are outsourced and analyzed at off-site laboratories along with the data generated from off-site analysis."

T-2-15

Page 4H-7, Line 19, text stating: "... unit characterization samples." The term "unit characterization samples" is not clear in the context of the sentences. Does the author mean "samples to characterize waste feed from the DST"? Please clarify the term "unit characterization samples".

T-2-16

Page 4H.7, Lines 43-45, text stating: "The ARL is one of the two analytical areas contained within the Lab. The ARL consists of thirteen laboratories commonly referred to as Rad Labs and is designed to operate during both the Baseline and DFLAW configurations. The other area is the AHL. The AHL consist of 14 hotcells .... " The structure of this paragraph is

awkward to this reviewer. Please consider changing this text to: "The LAB has two analytical areas, the ARL for low activity samples, and the AHL for high activity samples. The ARL consists of thirteen laboratories commonly referred to as Rad Labs and is designed to operate during both the Baseline and DFLAW configurations. The AHL consist of 14 hotcells .... "

T-2-17

Page 4H.8, Line 7, text stating: "Lab areas manage dangerous and/or mixed waste in Satellite Accumulation Areas (SAAs) and 90-Day Accumulation Areas pursuant to the generator requirements [WAC 173-303-200]." Areas in building do not manage waste. They are used by people to manage waste. Please consider changing the text to: "Dangerous and/or mixed waste is stored in both the ARL and AHL in Satellite Accumulation Areas (SAAs) and 90-Day Accumulation Areas pursuant to the generator requirements [WAC 173-303-200]."

T-2-18

Page 4H.8, Lines 8 through 10, text stating: "Organic liquids will be segregated and managed as Lab Packs WAC 173-303-161; other liquid wastes will be transferred to RLD Vessels to be returned back into the WTP process." Other portions of this document are written as if actions are occurring (present tense). Also, " ... to be returned ... " is not as clear as " .. for return to ... ". Finally, " ... managed as lab packs WAC 173-303-161" is awkwardly worded. Please consider changing the text to: "Organic liquids are segregated and managed according to WAC 173-303-161 using Lab Packs; other liquid wastes are transferred to RLD Vessels for return to the WTP process."

T-2-19

Page 4H.8, Lines 11 and 12, text stating: "The Labs also support the analyses of samples diluted, digested, and prepared in the hotcell facility." By "Labs" does the author mean both the ARL and the AHL? If this is the intended meaning it should be clearly stated? Please clarify what is meant by "Labs" in the indicated sentence.

T-2-20

Page 4H.13, Line 21, text stating: "Container management occurs to store and treat dangerous and/or mixed wastes ... " Is the Lab going to treat dangerous and/or mixed waste, or only store the waste. If the Lab is permitted for waste treatment then this sentence is correct. If the LAB is only permitted to store dangerous and/or mixed waste then " ... and treat ... " should be removed from this sentence. Also, preparing containers for safe transport of the waste is part of facility container management. Hence, the phrase " ... safely transport ... " should be added to the list of reasons container management occurs at the facility. Please determine the proper language based on the permitted activities for the Lab.

T-2-21

Page 4H.13, Line 22, text stating: " ... in support of WTP." The wording of this phrase in the context of the sentence is awkward to this reviewer. Please consider changing the text to: " ... to support WTP operations", or " ... to support the WTP".

#### T-2-22

Page 4H.14, Line 5, text stating: "All containers are labeled according to WAC 173-303-190." WAC 173-303-190 pertains to the labeling of containers for transport. Other codes describe the label requirements for containers used to store waste. Unless the permittee intends to label containers with the WAC 173-303-190 requirements at the time the other WAC required labels are placed on the container, please consider changing the text to: "All containers are labeled according to WAC 173-303-190 prior to shipping".

#### T-2-23

Page 4H.15, Line 12, text stating: "... PPE' Acronyms should be defined when first used. This text represents the first use of the acronym PPE. Please change the text to "... personal protective equipment (PPE)".

#### T-2-24

Page 4H.15, Lines 8 through 13: General Comment. The content of this document suggests that two additional waste stream examples should be added to this list since they are distinctly unique from the six items listed and will be regularly generated. These items are "Solid ion exchange resins" and "Solid absorbents from spill kits". Please consider if either or both of the indicated items should be added to the bullet list.

#### T-2-25

Page 4H.15, Line 16 and 17, text stating: "In addition, some wastes are segregated and managed as Lab Packs." More detail is needed to indicate the intent of this sentence. Please describe why certain wastes are segregated and managed in an over pack. Please consider adding the suggested text to clarify the intended meaning of the sentence.

#### T-2-26

Page 4H.15, Line 35, text stating: "Container storage area dimensions at the Lab are summarized in Table 4H-2." Table 4H-2 does not list storage area dimensions. Rather, the table lists the volume of the container storage areas. Either state that Table 4H-2 lists room volumes or add room dimensions to Table 4H-2.

#### T-2-27

Page 4H.15, Lines 39-40, text stating: "Employees working within the WMA while the facility is operating, will have immediate access to a device, such as a telephone ..." The phrase "while the facility is operating" can have many meanings. These meanings might include:

- At all times after commissioning.
- When the WTP is receiving waste.
- When the Lab is receiving samples.
- When waste is stored in the WMA.

Please clarify in the text the specific meaning of "while the facility is operating."

T-2-28

Page 4H.15, Lines 26 and 27 text stating: "A-0139A, Room A-0139A is equipped with a walk-in fume hood to facilitate the lab packing of liquid waste ..." The phrase "lab packing of liquid waste" is not clear to this reviewer. Does the author mean the safe transfer of liquid waste into to a waste container or Lab Pack? Would it be correct to say "... is equipped with a walk-in fume hood to facilitate the packaging or repackaging of liquid waste." Please consider alternate language to the phrase "lab packing of liquid waste"

T-2-29

Page 4H.16, Line 4, text stating: "All containers in storage are labeled to identify the major risk of the waste in the container" Many of the items in this list are followed by the corresponding WAC requirement or clarifying Section in Chapter 4H. To be consistent this item should be followed by a reference to WAC 173-303-395 and WAC 173-303-630(3). Please consider changing the text to: "All containers in storage are labeled to identify the major risk of the waste in the container. [WAC 173-303-395 and WAC 173-303-630(3)]"

T-2-30

Page 4H.16, Line 22, text stating: "... stored on the floor within the unit." The term "unit" is not defined in this section. Does the author mean the WMA or a container storage area? Please clarify what is meant by "unit"

T-2-31

Page 4H.16, Lines 22 and 23, text stating: "Labpacks are considered not to require further secondary containment and are also stored directly on the floor." Lab packs are secondary containment and so can be placed directly on the floor. This fact should be directly stated. Please consider changing the text to: "Lab packs are considered to be secondary containment and so may be stored directly on the floor (also see Section 4H.1.4.1)."

T-2-32

Page 4H.16, Line 29-30, text stating: "Unsupervised waste management staff will not perform waste movement operations until they are formally trained." Please clarify what is meant by "formally trained". Does this mean trained for the specific activity, or that the individual has completed all the required training for their position. Please make the requested clarification.

T-2-33

Page 4H.17, Lines 19, text stating: "... PIN' Acronyms should be defined when first used. This text represents the first use of the acronym PIN. Please add a definition of PIN to the text.

T-2-34

Page 4H.17, Lines 17, text stating: "The waste tracking database does the following:" Databases do not perform actions. Rather they allow operators to perform actions. Please consider changing the text to state: "The waste tracking database contains the information necessary to: " Note that if this sentence is used then each bullet should start with a singular action word like track, identify, and provide.

T-2-35

Page 4H.17, Line 21, text stating: "Has multiple levels of reporting capabilities (e.g., WTP management, DOE, regulators)." This bullet is not consistent with the others on the list. Consider rewording the bullet to "Provide reporting at multiple levels (e.g., WTP management, DOE, regulators)."

T-2-36

Page 4H.17, Line 25, text stating: "Provides capability to consolidate waste containers." It is not clear how a database provides the capabilities needed to consolidate waste. Does the author mean "Identify currently stored containers that can be consolidated"? Please reword this bullet to specifically state what role the information contained in the database has on waste consolidation.

T-2-37

Page 4H.17, Lines 26-27, text stating: "Records generated as part of waste management activities are managed in compliance with WTP procedures." How do records management requirements in WAC 173-303-210, WAC 173-303-300, and WAC 173-303-380 relate to the permittee's waste management record procedures? Should a reference to WAC requirements be added to this sentence? Please consider adding language to indicate the records will be managed in compliance with the appropriate sections of WAC 173-303 and the WTP procedures.

T-2-38

Page 4H.19, Line 1, text stating: "Waste that does not contain free liquids or is not ignitable or reactive does not require a containment device as stated in WAC 173-303-630(7)(c) since the areas are within a building and are protected from precipitation ...." Page 4H.16 adds "... and are not designated as F020, F021, F022, F023, F026, or F027" to the list of caveats for storage of waste without secondary containment. This language is directly from WAC 173-303-630(7)(c). Consider making the text consistent with WAC 173-303-630(7)(c). This comment also applies to the similar sentence on Lines 32-34.

T-2-39

Page 4H.21, Line 8, text stating: "Spilled or leaked waste and liquids such as sprinkler water will be removed ... " This statement is contained in a section that is dealing with removal of all types of liquids from containment systems. Reference to a specific source of a liquid is not necessary. Please consider changing the text to: "Spilled or leaked waste and other liquids will be removed ... "

T-2-40

Page 4H.21, Section 4H.1.4.7: General comment This section is titled "Demonstration that Containment is not required because Containers do not Contain Free Liquids, Wastes that Exhibit Ignitability or Reactivity, or Wastes Designated F020-023, F026 or F027". Text within the section discusses free liquids and F-coded wastes, but does not discuss ignitable or reactive wastes. It is clear from Section 4H.1.5 that reactive and ignitable wastes will be

generated. Please clarify why reactive and ignitable wastes are not discussed in this section. If the omission was an oversight, please add the proper text to cover these two waste characteristics.

T-2-41

Page 4H.21, Section 4H.1.5, text stating: General comment There are several references to "portable secondary containments" in this section. A more correct term is "portable secondary containment platforms". Please consider substituting portable secondary containment platforms" for portable secondary containments".

T-2-42

Page 48.22, Lines 13-15, text stating: "Incompatible wastes are segregated by space and by portable secondary containment pallets. Incompatible wastes are also stored on separate secondary containment (if required) and at least 30-inches apart. The first and second sentences provide the same information. Please consider changing the text to: "Incompatible wastes are segregated by placing them on separate secondary containment (if required) and by spacing them at least 30-inches apart.

T-2-43

Page 4H.22, Line 38, text stating: "The floor drain collection vessel is identified as part of the RLD System" This statement is not consistent with Figure 4H-4 which shows a boundary for the Lab RLD System that excludes RLD-VSL-0163. Please ensure both the text and figure are accurate and correct.

T-2-44

Page 4H-23, Lines 23-24, text stating: " ... and flushed with a minimum of 0.5 gallon of flush water for each 40 milliliters (ml) of sample before they are discharged to the RLD-VSL-00164." What is the basis for the 0.5 gallon flush for every 40 mL of liquid discharged to RLD-VSL-00164? This level of flushing increases the volume of waste by 47 fold. Please verify this amount of flushing for every sample is necessary, or if another protocol can be used that would minimize the volume of waste being generated.

T-2-45

Page 4H.23 and 4H.24: General comment. Different operating regimes for waste from RLD-VSL-00164 (00164) are described. During DFLAW operations, waste from 00164 will be sent to the EMF Direct Feed Effluent Transfer system and subsequently to the Liquid Effluent Retention Facility/Effluent Treatment Facility (LERF/ETF). During baseline operations, the waste from 00164 is described as being routed to RLD-VSL-00165 (00165) and then to the pretreatment facility and finally to the HLW vitrification system or the LERF/ETF. Are there any situations under the baseline conditions where waste from 00164 might continue to be directly sent to the treatment facilities without being routed through 00165? If so, a sentence should be added to describe this alternative mode of operation during baseline processing. Please consider the comment and adjust the text if appropriate.

T-2-46

Page 4.H-24, Lines 25-26, text stating: " ... with a minimum of 0.5 gallon of flush water for each 20 milliliters (mL) of sample." What is the basis for the 0.5 gallon flush for every 20 mL of liquid discharged to RLD-VSL-00164? This level of flushing increases the volume of waste by 94 fold. Please verify this amount of flushing for every sample is necessary, or if another protocol can be used that would minimize the volume of waste being generated.

T-2-47

Page 4H.24, Line 28-29, text stating: " ... each of the Lab RLD vessels is updated in LIMS using the computer workstation." This is the first mention that the RLD vessel waste will be tracked in the LIMS. This is an important concept that should be mentioned when the LIMS is introduced in the document on Page 4H.6. Please consider adding text on Page 4H.6, after the period on Line 17, to state that the LIMS is used to track process samples through their life cycle and also to track the volumes, content, and fate of dangerous and/mixed waste generated in the facility, including process waste sent to the RLD.

T-2-48

Page 4H.24, Line 36, text stating: " ... include but not limited to:" A comma is missing after "include". Please add the missing comma.

T-2-49

Page 4H.25, Line 29-30, text stating: "Double-walled piping is constructed of either carbon steel or stainless steel The sentence is not a clear description of the double walled pipe. Does the author mean the outer containment of the double-walled pipe is constructed of carbon or stainless steel, or that the double-walled pipe (both the inner pipe and the outer containment) are constructed of carbon or stainless steel, or is there another intended meaning? Please reword this sentence to clearly state the intended meaning.

T-2-50

Page 4H.25, Line 33-34, text stating: " ... applicable leak detection criteria is met." No reference or discussion is provided to indicate what leak detection criteria is to be met. Please add a reference to the location in the HDW Permit where the leak detection criteria are documented.

T-2-51

Page 4H.26, Line 20, text stating: " ... Lab LDBs are ... " This is the first use of the acronym LDB. Acronyms should be defined when first used. Please add the definition of LDB.

T-2-52

Page 48.28, Line 2, text stating: " ... and disposed of as solid waste ... " What is the fate of solid and immiscible organic wastes produced in the AHL? Are these wastes considered a RCRA mixed waste, or are they a radiological waste managed under DOE authority? Please clarify the fate of these solid wastes and, if applicable, include a reference to the portion of the HDW Permit where their fate is documented.

T-2-53

Page 4H.28, Lines 23-25, text stating: " ... Based upon valve configuration the pumps can recirculate the vessel contents, or discharge to the hotcell drain collection vessel (RLD-VSL-00165 ), or empty RLD-SUMP-00045 located within the vessel cell." This text appears to describe baseline operations but not DFLAW operations where materials from RLD-VSL-00164 is routed to the EMF Direct Feed Effluent Transfer system (see Pages 4H.23 and 4H.24). Also, Figure 4H-5 indicates that Sump RLD-SUMP-00041 can be a feed source for RLD-PUMP-00182 A/B, but not sump RLD-SUMP-00045. Please describe the operation of RLD-VSL-00164 under both DFLAW and baseline operations. This comment also applies to the text on Lines 39-41 of the same page. Also please verify which sumps can be emptied by RLD-PUMP-00182 A/B.

T-2-54

Page 4H.28, Line 39, text stating: "Effluent transfer to hotcell drain collection vessel (RLDVSL-00165 )." The indicated text is not a complete sentence. If this text is intended to be a title for a sub-section then it should be highlighted in the same manner as the work "Mix" in the preceding paragraph. Please correct the text as appropriate.

T-2-55

Page 4H.29, Lines 20 and 24, text stating: General comment. This list feed streams to RLD-VSL-00165 does not appear to be consistent with Figure 4H-6. Figure 4H-6 omits the C3 decontamination booth drain feed and indicates a feed line from RLD-VSL-00163 and from the C5 effluent vessel cell sump (RLD-SUMP-0042). Please ensure the figure and text are consistent and correct.

T-2-56

Page 4H.29, Lines 21, text stating: "RLD-SUMP-0042" The Laboratory area sink sum is listed as RLD-SUMP-0042 while the designation on Figure 4H-5 is RLD-SUMP-0041. Please ensure the figure and text are consistent and correct.

T-2-57

Page 4H.30, Line 16, text stating: "C3 areas are restricted occupied areas .... " The word "occupied" is not used correctly in this sentence. Does the author mean "restricted occupancy"? Please correct the text as appropriate.

T-2-58

Page 4H.31, Lines 6-7: General comment. The text states that WAC-173-303-692 and 40 CFR 264 Subpart CC do not apply to the WTP mixed waste Lab RLD Systems and containers. No reasoning is given for this statement. Please add a statement giving the reason that WAC-173-303-692 and 40 CFR 264 Subpart CC do not apply to the WTP mixed waste Lab RLD Systems and containers. Please ensure the language is consistent with Section 6A.6.3 of Chapter 6A in Part III, OUG-10 of the Hanford Dangerous Waste Permit.

T-2-59

Page 4H.31, Lines 6-7: General comment. Section 6A.6.3 of Chapter 6A in Part III, OUG-10 of the Hanford Dangerous Waste Permit states "Containers or tanks bearing

nonradioactive, dangerous waste, such as maintenance and laboratory waste, that are not excluded under WAC 173-303-692(1)(b)(ii) or 40 CFR 264.1082(c), will comply with the container and tank standards specified under 40 CFR part 264 Subpart CC" This statement implies that there might be containers in the Lab that are not excluded from complying with 40 CFR 264 Subpart CC. Please determine which statement is correct and ensure the language in Section 4H.3.3 in this document is consistent with Section 6A.6.3 of Chapter 6A in Part III, OUG-10 of the HDW Permit.

#### T-2-60

Page 4H.37, Table 4H-1: General comments. Adding room numbers from Figure 4H-1 to the entries in the second column of this table would benefit the reader. Also, all entries in the fourth column (labeled "Permitted") are "No". Hence, this column is not needed. Instead, add a sentence to the text where this table is introduced to indicate that "all areas in Table 4H-1 are not permitted for waste storage". Please consider making the indicated changes to Table 4H-1.

#### T-2-61

Page 4H.42, Table 4H-2: General comments The second column in the table is labeled "Approximate Dimensions" but gives the room volume. The third column in the table lists the "Maximum Waste Volume" as the volume of the room (LxWxH), converted to gallons. This estimate for the maximum waste volume that can be stored in the room is not realistic. The estimate does not consider factors such as the need to place the waste in containers, height restrictions for stacking waste containers and the need walkways between containers. For Column 2, either relabel the column as "Approximate Room Volume" or change the entries show the length, width, and height of the rooms. For Column 3, recalculate realistic maximum waste volumes for the rooms. Assumptions for the estimate should be given in the text or as a footnote to the table.

#### T-2-62

Page 4H.42, Table 4H-3, Row 1, text stating: "Diameter" There is no indication if these values represent the inside or outside diameter of the vessel. Please clarify if the entries are the inside or outside diameter of the vessels

#### T-2-63

Page 4H.44, Table 4H-4, Column 5: General comment. The assumptions necessary to calculate the minimum secondary containment height are not provided. These should be added as a footnote to the table to facilitate review of the accuracy of the estimate. Please consider adding the indicated footnote.

#### T-2-64

Page 4H.51, Figure 4H-4: General comments. This figure is not consistent with many aspects of operations described in the document. Theses inconsistencies include: 1. A tanker truck is shown to indicate that, during startup and cold commissioning, different waste management processes will be used. This phase of operation was not mentioned in the text. If a different operation strategy will be used during startup and cold commissioning then the text should describe three phase of operation; Startup and Cold

Commissioning, DFLAW, and Baseline. 2. Except for startup and cold commissioning, effluent from RLD-VSL-00164 is shown being fed only to RLD-VSL-00165 and then to the pretreatment facility. This is not consistent with DFLAW operations. 3. On Page 4H.22 it is stated that RLD-VSL-00163 is part for the RLD system but is not permitted to manage dangerous and/or mixed wastes. This description is not consistent with the RLD system boundary shown on the figure. Please ensure this figure is consistent with the rest of Chapter 4H. Also, determine if the document needs to describe three phase of operation; Startup and Cold Commissioning, DFLAW, and Baseline.

T-2-65

Part III, Operating Unit Group 10, Chapter 6 (Inspection Plan) of PMR 8C.2017.4D Page 6A.7, Table Entry for "Physical", text stating: "An inspection conducted physically in person (e.g. maintenance or operator)." The definition does not need to clarify what is meant by "person". Please remove the parenthetical text.

T-2-66

Page 6A.7, Table Entry for "Remote", text stating: "An inspection conducted by one or all of the following methods: closed-circuit television, observation windows, control panels, process control system, or any other inspection that is not conducted physically in person." The list of methods is not consistent since all items in the list refer to specific tools except "or any other inspection that is not conducted physically in person". Please consider changing the definition to "An inspection conducted by closed-circuit television, observation windows, control panels, process control system, or any other inspection that is not conducted physically in person." This wording does not require all items in the list to be a method.

T-2-67

Page 6A.8, Lines 11-12, text stating: "\* Washington Administrative Code requires some dangerous waste inspections to be completed every 7 days. Affected inspections are identified in the Inspection Tables." It is not entirely clear to this reviewer how the affected inspections are identified in the table unless it is by the entry of "at least every 7 days" in the frequency column. If this is a correct interpretation of the indicated text then please change the indicated text to the following: "\*Washington Administrative Code requires some dangerous waste inspections to be completed every 7 days. Affected inspections are identified in the Inspection Tables with a frequency of 'At Least Every 7 Days'." Please consider altering the text to indicate how the affected inspections are identified in the Inspection Tables.

T-2-68

Page 6A.6, Line 1-32: General comment The records retention requirement discussed in the section stems from W AC-173-303-320(2)( d). Please add a reference to the appropriate section of the WAC at the end of the indicated text.

T-2-69

Page 6A.10, Lines 41-42, text stating: " ... the permittee will follow the remedial actions found in permit conditions III.10.E.5.i.i through III.10.E.5.i. v." Why are sections

III.10.E.5.i.vi and III.10.E.5.i.vii not relevant to the permittee's response? Please determine if sections III.10.E.5.i.vi and III.10.E.5.i.vii should also be included in the permittee's response to a leak or spill.

#### T-2-70

Page 6A.12, Table 6A-1: General comments 1. The columns do not have labels. Columns should be labeled Items, Criteria, Frequency, and Type (in order from left to right) 2. Column 2. Row 12: Spill kit and spill control equipment should be inspected to verify they are correct for the types of hazardous material that are stored in the area they serve. 3. Column 3, last two rows: Emergency power system components should be tested for frequently than once a year. This reviewer suggest quarterly inspections for the critical components of the emergency power systems. 4. Colwnn 2. Row 13: The acronym "ERP" is not defined (Second column, 13th row). ERP should be defined when first used. 5. Footnotes should be table footnotes that appear at the bottom of the table and not document footnotes that appear at the bottom of the page. This comment applies to all footnotes in the Inspection Tables in Chapter 6A. Please consider making the indicated corrections. Note that the comment about the need to label the columns also applies to Table 6A-1.

#### T-2-71

Page 6A.13, Table 6A-2a, last row, text stating: "Inspect, by professional person or in the presence of a fire marshal ... " The qualifications that would allow an individual to be accepted as a "professional person" for this inspection need to be defined. Are there specific certifications, licenses, or documented training requirements? If Page 6A.11, Lines 5-6 are the correct definition then either change "professional person" to "Individual familiar with the International Fire Code", or add a table footnote to define "professional person". Please consider changing the table as indicated. Note that this comment applies to all similar table entries in Chapter 6A.

#### T-2-72

6A.13, Table 6A-2b: General comments 1. Row 1 of the table is the table title and should be text placed above the table and not within the table. Consider breaking all the sub-tables on Pages 6A.13 through 6A.24 into individual tables. This action will greatly improve the clarity of the tables. 2. Row 3, Column 2 of the table states there will be a "review of alarm status". Does this mean a review of the current alarm status at the time of the inspection or the historical alarm records? The text should be altered to clarify what is being reviewed. This comment applies to the use of "review alarm status" throughout the tables in Chapter 6A. 3. Row 4, Column 2 of the table lists the inspection as "Operating history review". All other inspection entries start with an action such as "Inspect" or "Check". This entry should be rewritten to maintain consistency. For example, the entry could be reworded to "Review Operating History". 4. Row 4, Column 4 has an entry of NA for the type of review. The type should either be physical or remote. This comment applies to all uses of NA as the frequency for operating history reviews within the inspection tables. 5. Row 4, Column 2: The entry for "Visual inspection" is not specific. A more accurate description would be "Inspect for signs of leaks or deterioration" 6. Row 4, Column 2: The entry for Nondestructive examination should start with an action word to be consistent with the

other entries. The entry is also missing a reference to footnote 3. Change the entry to "Examine using Nondestructive Methods 3" Please consider making the indicated changes.

T-2-73

Page 6A.14, Table 6A-3a: General comments 1. Row 1 of the table is the table title and should be text placed above the table and not within the table. 2. Row 4 (Building Exterior), Column 2: The entry calls for inspection for signs of dangerous waste. Should the inspection also include signs of mixed waste? 3. Row 5 (Interior rooms). Column 2: Checking the differential pressure records is done "to ensure negative pressure has been maintained in the containment building" and not as currently stated "to ensure negative pressure in the containment building". Inspections are not concerned with past history as well as the present condition. 4. Row 9 (Filled ILAW containers), Column 2: The first two items in the list of three are not stated as inspection requirements. Remove "Record in tracking system each container's ...." and "Record in tracking system all container locations ...". Rewrite the third entry to "Verify container is in the location recorded in the tracking system". This comment applies to all similar entries in the inspection tables in Chapter 6A Please consider making the indicated changes.

T-2-74

Page 6A.15, Table 6A-3b: General comments 1. Row 1 of the table is the table title and should be text placed above the table and not within the table. 2. Row 6 (Tank integrity assessment), Column 3: Section 6.A.4.2.2 indicates these inspections will occur every 7 to 10 years depending on the corrosion and erosion potential. In contrast, the table shows an entry of "TBD". It is not clear to this reviewer why the text and table are not consistent. 3. TBD entries for the table. It is not apparent to this reviewer why they inspection requirements are "to be determined" since the LAW facility design is both mature and sufficient to estimate these requirements. However, if these entries are to be left as TBD then a footnote is needed to identify what information is lacking to establish the characteristics for these inspections and when the information will be incorporated into Chapter 6A. This comment also applies to the TBD entries in Table 6A-3b. Please consider making the indicated changes.

T-2-75

Pages 6A.23 and 6A.24, Table 6A-7a, Column 2, Rows 3 and 4: '... all containers holding free liquid have portable secondary containment ...' The requirement is for secondary containment not portable secondary containment. Hence, the inspection should be to ensure all containers holding free liquid have secondary containment. Please consider removing the word "portable" from both of the indicated entries.

T-2-76

Page 6A.24, Table 6A-7b, Row 4, Column 3, text stating: "Bi-Monthly" Bi-monthly is commonly used to mean both twice a month and every two months. Please state the frequency of inspection as "Every Two Months" or "Every Two Weeks", whichever is applicable.

T-2-77

Part III, Operating Unit Group 10, Chapter 8 (Personnel Training) of PMR 8C.2017.4D Page 8.6, Line 2-3, text stating: "A properly designed training program ensures that personnel who perform duties at the WTP related to WAC 173-303-330(1)(d) ... " WAC 173-303-330(1)(d) does not give a description of duties or functions. Rather, it specifies that employees must be supervised till they complete their training. WAC 173-303-330(1)(e) does list critical systems and activities that require training. Did the author intend to reference WAC 173-303-330(1)(e)? Please verify the correct reference to WAC 173-303-330. This comment also applies to the reference to WAC 173-303-330(1)(d) on Lines 16 and 17 of Page 8.6.

T-2-78

Page 8.6, Lines 5-4: General comment. This bullet list appears to be a generic outline to develop a training program. If this is a correct interpretation of the text then it is suggested the list be preceded by a sentence stating, "A general approach to developing a training program is as follows:" Please consider making the indicated change to the text.

T-2-79

Page 8.6, Lines 18-23: General comment Five items in this bullet list directly correspond to sub items under WAC 173-303-330(1)(3)(e). Each bullet should end with a reference to the corresponding WAC reference. These references are (in order) WAC 173-303-330(1)(e)(i), WAC 173-303-330(1)(e)(ii), WAC 173-303-330(1)(e)(iii), WAC 173-303-330(1)(e)(iv), and WAC 173-303-330(1)(e)(vi). Please consider adding the indicated references.

T-2-80

Page 8.6, Lines 24-26, text stating: "The WTP Dangerous Waste Training Plan will contain detailed course curricula for the types of training WTP personnel receive based on Attachment 5 and Tables 8-1 and 8-2." Tables 8-1 and 8-2 are labeled as examples and so are not actual criteria that will be used to identify training needs and course curricula. If these table are placeholders for tables that will be developed later then this should be indicated in a footnote. Please consider adding the indicated footnote. This comment also applies to the references to Tables 8-1 and 8-2 on Page 8.8.

T-2-81

Page 8.6, Line 40-412 text stating: "A description of how The WTP Dangerous Waste Training Plan meets the requirements in WAC 173-303-330(2) is as follows:" The text that follows this sentence also makes reference to requirements in WAC 173-303-330(3). This section of the WAC should be included in the sentence as follows: "A description of how The WTP Dangerous Waste Training Plan meets the requirements in WAC 173-303-330(2) and WAC 173-303-330(3) is as follows:" Please consider making the indicated change to the text.

T-2-82

Page 8.7, Line 17, text stating: " ... outline provided in Section 8. 0, ... " The reference to Section 8.0 is ambiguous. In what document is the outline provided in Section 8.0? Please clarify what document is being cited by the reference to Section 8.0.

T-2-83

Page 8.7, Line 27-29, text stating: "Records documenting that personnel have received and completed the training required by this section. The Department may require, on a case-by-case basis, that training records include employee initials or signature to verify that training was received" Washington Department of Ecology should establish a regular schedule for auditing training records since proper training is fundamental to correctly handling, storing, and processing the various waste streams that will be present in the WTP. Please consider a regular audit schedule for training records.

T-2-84

Page 8.7, Line 30-31, text stating: "Training records are maintained consistent with Permit Attachment 5, Section 8.5.5 and WAC 173-303-330(3)" There is no Section 8.5.5 in Chapter 8 or Permit Attachment 5. What document is being cited by the reference to Section 8.5.5? Please clarify the reference to Section 8.5.5.

T-2-85

Page 8.7, Lines 38-39, text stating: "The introductory and continuing training programs ... The term "introductory" is typically used to refer to an overview course that introduces a subject area to trainees. The correct term to use in the indicated sentence is "initial" since it is referring to the first time a trainee receives training. Please change "introductory" to "initial".

T-2-86

Page 8.8, Line 20, text stating: "The job titles and job positions are specified in Attachment 5 ..." Permit Attachment 5 does not contain a list of job titles or position descriptions. Please clarify where this information is found.

T-2-87

Page 8.9, Table 8-1, Column 1, text stating: "WTP DWTP Implementing Category" The acronym DWTP is not defined in the text. Please add a footnote to the table defining DWTP.

T-2-88

Page 8.10, Table 8-2, last row, Column 5: General comment The laboratory manager will be overseeing staff who are implementing waste management activities. For this reason the laboratory manager should be required to be trained in General Waste Management. Please consider adding a requirement for General Waste Management training for the laboratory manager.

## **Response To: Confederated Tribes of the Umatilla Indian Reservation**

T-2-1

Edit has been made to Table III.10.E.D in the Permit Conditions to reference the appropriate table in Chapter 4H Operating Unit Group 10.

T-2-2

Thank you for your suggestion, for consistency all tables in the WTP Conditions are formatted similarly. Information in the 5th column will remain as written as the heading of that column is in "(gallons)" corresponding to the 3,180 value. We have added a comma to 3,180 and 9,100 to ensure consistency throughout the tables.

T-2-3

Ecology appreciates the comment regarding primary sumps as identified in Table III.10.E.O - Laboratory Tank Systems. Ecology has reviewed the definitions of primary and secondary sumps in Permit Condition III.10.A and concluded that a modification to the definitions was necessary for clarity. Typical decontamination activities at the WTP facilities in rooms equipped with secondary containment sumps will normally occur following a leak or spill. These are expected to be rare events based on the design and materials used for WTP dangerous waste components. Once a decontamination activity is completed, the effluent in the sumps will be removed and the sumps will revert to their normal dry condition. For this reason, Ecology believes the change to include decontamination activities in the secondary sump definition is appropriate. The majority of sumps in the WTP facilities are part of secondary containment systems designed to contain leaks or overflow from primary containment vessels, unless specifically identified as primary sumps in the appropriate permit tables. The sumps in Rooms A-B003 and A-B004 (RLD-SUMP-00041 and RLD-SUMP-00042, respectively) are correctly identified as secondary containment sumps in Table III.10.E.P. These sumps are part of the secondary containment system for the tank systems in those rooms. They are dry sumps, which means they normally do not contain dangerous waste.

T-2-4

Thank you for your comment, edits have been made to correct the discrepancy in significant figures in the tables.

T-2-5

Thank you for your suggestion, the RESERVED row in Table III.10.E.P is not necessary and has been deleted.

T-2-6

For clarification the text was revised to read, "While operating in the DFLAW configuration, the contents of the laboratory area sink drain collection vessel are transferred to the EMF Direct Feed Effluent Transfer (DEP) system for evaporation and treatment prior to being returned to the LAW vitrification process, or sent to be treated at the Liquid Effluent Retention Facility/Effluent Treatment Facility (LERF/ETF)." Each facility has a Waste Acceptance Criteria in place to ensure that waste received is within established waste processing criteria.

T-2-7

Thank you for your comment. Section 3.2.1 was incorrectly referenced. Permit Condition III.10.L.3.c was edited to correctly reference Section 3A.3.1.1 in Chapter 3/3A, Waste Analysis Plan.

T-2-8

Once the facility is in operation and actively managing waste, the Permittees will have waste profiles and analyses in their Operating Record. At that time the Confederated Tribes of the Umatilla Indian Reservation and other stakeholders can request to view the documents in question.

T-2-9

Post incident written reports are required for certain incidents on the Hanford Site as described in DOE/RL-94-02, Hanford Emergency Management Plan (HEMP), Section 5.1. If required by the HEMP, written incident reports are submitted to Ecology within fifteen days after the incident. These reports are also available to affected state, tribal, or local officials, press, or general population.

T-2-10

Thank you for your suggestion, however regulatory/compliance inspections are not open to the public. Inspectors are legally authorized under RCW 70.105.130 to perform on-site inspections of the Permittees' compliance under WAC regulations and permit conditions. Attendance by a third party or the public is not allowed.

T-2-11

Thank you for your comment, the reference in Permit Condition III.10.L.8.b has been corrected to read "-320."

T-2-12

Thank you for your comment, Permit Condition III.10.L.16.b.vi has been edited as requested, to provide additional clarification.

T-2-13

The terms "Baseline configuration" and "DFLAW configuration" are both defined in Chapter 4.0, Process Information, which is the lead-in to the facility specific sub chapters.

T-2-14

The Laboratory Information Management System (LIMS) is being used to track outsourced sample receipt and shipment. At this time, no plan is in place to enter the sample data into LIMS.

T-2-15

This sentence explains that outsource laboratories will be used to analyze samples to characterize waste feed from the double shell tank (DST) system. "Unit characterization samples" refers to waste characterization samples from the DST system.

T-2-16

Thank you for your comment, the text in Chapter 4H, General Description of the Analytical Areas has been revised to add clarification.

T-2-17

Thank you for your comment, the text in Chapter 4H has been revised as requested.

T-2-18

Thank you for your comment, text in Chapter 4H has been revised as requested.

T-2-19

Thank you for your comment, the text in Chapter 4H has been revised for clarity.

T-2-20

Thank you for your comment, the text has been revised.

T-2-21

Thank you for your comment, this sentence has been edited for clarity.

T-2-22

Thank you for your comment, the text has been revised to add clarification.

T-2-23

Thank you for your comment, the definition has been added to the text.

T-2-24

Although there may be other waste streams regularly generated that are distinctly unique, the list of waste streams are only examples, as stated in Section 4H.1.2, Container Management Practices. No additional waste streams will be added to the list at this time.

T-2-25

Thank you for your comment, the sentence has been revised for clarity.

T-2-26

Thank you for your comment, the sentence has been edited to identify volumes instead of dimensions in Table 4H-2.

T-2-27

Thank you for your comment, the text has been revised for clarity.

T-2-28

Thank you for your comment, the text has been revised as appropriate.

T-2-29

Thank your for your comment, WAC references have been added to the text for consistency.

T-2-30

Thank you for your comment, the sentence has been edited to clarify the term "unit."

T-2-31

Thank you for your comment. The referenced sentence has been rewritten.

T-2-32

Thank you for your comment, the text was revised for clarity.

T-2-33

Thank you for your comment, text has been revised.

T-2-34

Thank you for your comment, the text has been revised for clarity.

T-2-35

Thank you for your comment, the referenced bullet has been reworded.

T-2-36

Thank you for your comment, the text has been revised.

T-2-37

Thank you for your comment, WAC reference has been added for clarification.

T-2-38

Thank you for your comment, text has been revised for consistency.

T-2-39

Thank you for your comment, text has been revised for clarity.

T-2-40

Text has been added to Section 4H.1.4.7 to address ignitable and reactive wastes. Management of ignitable and reactive wastes are discussed in Section 4H.1.5.1, Management of Ignitable and Certain Other Waste in Containers. It is not the intent of the Permittees to seek relief from using secondary containment for these waste streams. This specific section (4H.1.4.7) was added to the Chapter in order to be consistent with the Washington State Department of Ecology guidance for Dangerous Waste Permit Application Requirements.

T-2-41

Thank you for your comment, however the wording of "portable secondary containment" is consistent with language used throughout the Hanford Site-wide Permit.

T-2-42

Thank you for your comment, text has been revised for clarity.

T-2-43

Section 4H.2.1.1, Laboratory Floor Drain Collection Vessel (RLD-VSL-00163), explains that RLD-VSL-00163 collects, contains, and transfers non contaminated liquid effluent and is

not designed to manage dangerous and/or mixed wastes. RLD-VSL-00164/00165 are permitted to manage dangerous and/or mixed wastes and are identified in Figure 4H-4 as being inside of the Permitted LAB RLD TSD Boundary. Figure 4H-4 was revised to clarify the boundary.

T-2-44

After reviewing the text and supplemental supporting documentation for RLD-VSL-00164, the text will be revised to read as follows: "Containers of aqueous liquids are discharged to RLD-VSL-00164 through ARL fume hood sink drains, followed with flush water to help minimize potential corrosion and reduce radiological dose rates." The purpose of the flush is to minimize potential corrosion. The specific volume of the flush water will be determined once operating procedures have been evaluated, reviewed and accepted by the WTP Materials Engineering Technology organization (MET) prior to operations.

T-2-45

At this time, there are no plans to route RLD-VSL-00164 directly to the treatment facilities in the Baseline configuration. The Effluent Management Facility will not be operational during Baseline operations. During Baseline operations waste will always flow through RLD-VSL-00165 as described.

T-2-46

After reviewing the text and supplemental supporting documentation for RLD-VSL-00164, the text will be revised to read as follows "Containers of aqueous liquids are discharged to RLD-VSL-00165 through hotcell cupsink drains, followed with flush water to help minimize corrosion and reduce radiological dose rates." The purpose of the flush is to minimize potential corrosion. The specific volume of the flush water will be determined once operating procedures have been evaluated, reviewed and accepted by the WTP Materials Engineering Technology organization (MET) prior to operations.

T-2-47

The referenced text was an error. LIMS will be utilized to capture laboratory information in support of the WTP waste treatment process. A waste tracking database will be developed to track tank wastes. Text has been revised and mention of LIMS in this section has been deleted.

T-2-48

Thank you for your comment, a comma has been added.

T-2-49

Thank you for your comment, the text has been edited for clarity.

T-2-50

Leak detection criteria specific to the Lab RLD System is defined in WTP Permit Condition III.10.E.9.e.ii and detailed in WTP Permit Appendix 11.18.

T-2-51

Thank you for your comment, the definition has been added to the text.

T-2-52

Thank you for your comment, the text has been revised to clarify how the waste will be managed.

T-2-53

This text describes only Baseline operations as RLD-VSL-00165 is not operational during DFLAW operations. Additional text has been added to describe DFLAW operations. Reference to RLD-SUMP-00045 was a typo and has been corrected.

T-2-54

Thank you for your comment, the text has been revised.

T-2-55

Thank you for your comment, the list has been revised to clarify incoming streams to Hot Cell Collection Drain Vessel (RLD-VSL-00165). Figure 4H-6 does not show the decontamination booth drain feed as it feeds into the Glovebox Drain Collection Header, which is depicted. This figure is a simplified figure and was not intended to show all of the individual streams.

T-2-56

Figure 4H-5 is correct, the Laboratory Area Sink Vessel Sump is RLD-SUMP-0041. The incoming streams list to the Hot Cell Drain Collection Vessel (RLD-VSL-00165) was unclear as written, the sump should have been listed separately as RLD-SUMP-0041. The text has been revised for clarity.

T-2-57

Thank you for your comment, the text has been revised.

T-2-58

Thank you for your comment, clarifying text has been added to Section 4H.3.3, Applicability of CC Standards in Chapter 4H.

T-2-59

Containers of non-radioactive dangerous waste that meet the volatile organic concentration (VOC) limits for this requirement are managed in lab packs, which are exempt by virtue of their size. As stated in the comment response above the necessary text has been added to Section 4H.3.3, Applicability of CC Standards, of Chapter 4H.

T-2-60

Thank you for your comment, however room numbers will not be added to Table 4H-1, as this level of detail is not applicable to non-permitted sections of the facility. Ecology believes there is a benefit to retaining the fourth column in Table 4H-1. This column adds clarity to define these rooms are not permitted for management of dangerous and/or mixed wastes. The language describing this table has been revised to clarify the purpose of this table.

T-2-61

Thank you for your comment, the title has been changed to "Approximate Room Volume." In regard to the third column in Table 4H-2, Ecology and the Permittees believe the Maximum Waste Volume listed is correct. The volume calculation noted in the footnotes 1 and 2 is conservative. This allows flexibility in the configuration and storage of waste containers. The Permittees will still be required to follow WAC requirements for aisle spacing and container management.

T-2-62

Thank you for your comment, Table 4H-3 has been edited to identify outside diameters.

T-2-63

Thank you for your comment, footnote was added to table 4H-4 for clarity.

T-2-64

Thank you for your comment, Figure 4H-4 has been revised to address comments.

T-2-65

Thank you for your comment, parenthetical text was removed.

T-2-66

Thank you for your comment, text has been revised.

T-2-67

Thank you for your comment. The text has been edited to clarify the affected Inspection Tables.

T-2-68

The WAC citation applies via General Facility Permit Condition, II.O.1 as well as WTP Unit Specific Permit Condition, III.10.C.5.c. Referencing the WAC at the end of this text is not necessary as there is already a reference to WAC 173-303-320 in Section 6A.0 Inspection Plan of this chapter.

T-2-69

Thank you for your comment, text has been edited for accuracy.

T-2-70

The labels for the columns were inadvertently removed due to a formatting error. Ecology will ensure the labels are reinserted for the final issuance of the permit. The spill kits/equipment will be inspected to verify the equipment is available, however there will be no change to the text in the table. Annual operability inspections of emergency power systems are appropriate, there will be no change to the text in the table. Emergency Response Plan (ERP) is included in the WTP Facility Specific Permit Conditions list, therefore it has been defined in the document. The footnotes do apply to the tables and have been formatted to clearly identify which tables within Chapter 6A they apply to.

T-2-71

Thank you for your comment, please refer to Section 6A.5, Storage of Ignitable or Reactive Wastes for an explanation of "professional person."

T-2-72

Individual inspection tables have been established for each type of inspection, for the WTP facility. Necessary changes have been incorporated into the tables to ensure accuracy.

T-2-73

Individual inspection tables have been established for each type of inspection by WTP facility. The text has been revised as suggested to include "mixed waste and "negative pressure has been maintained in the containment building." The text in this column will remain as currently written.

T-2-74

Individual inspection tables have been established for each type of inspections by WTP facility. Table 6A.3b was submitted as an Example from the Permittees. When all facilities at the WTP are operational, the tables that are identified with "Example" in the title will be updated. The term "Example" will be removed from the tables and the entries of "TBD" will be replaced with a specific frequency.

T-2-75

As stated in Chapter 4H, "The WMA is not constructed with containment systems to meet these secondary containment requirements. In order to meet the requirements for secondary containment, containers are placed on portable secondary containment systems or elevated (e.g., pallets, skids), to protect the containers from contacting accumulated liquids." Therefore, Ecology believes the use of the term "portable" adds clarity to the information in the table.

T-2-76

Thank you for your comment, the frequency has been changed to read "every other month" to avoid confusion, and is consistent with WAC 173-303-640(6)(c)(ii) language.

T-2-77

Thank you for your comment, the text has been revised to reference the appropriate reference, WAC 173-303-330(1)(e).

T-2-78

Thank you for your comment, however the text provides the necessary regulatory information and criteria of duties for a training program. There were no edits made to this text.

T-2-79

Thank you for your comment, the corresponding WAC references have been added to each bullet point as suggested.

T-2-80

Tables 8-1 and 8-2 are labeled as examples, but are also templates that are used across the Hanford Site-wide facilities for identifying training needs and course curricula. No footnote is necessary.

T-2-81

The language provided in the three bullets discusses the requirements of WAC 173-303-330(2). WAC 173-303-330(3) is only used as a reference at the end of bullet #3. At this point, Ecology does not feel it is necessary to add the additional WAC reference.

T-2-82

The language regarding the discussion of an outline is an error, the text has been deleted.

T-2-83

Ecology agrees that proper training is fundamental. Per the WAC requirements, on a recurring schedule, Ecology will audit and inspect the Analytical Laboratory Facility employee training records to ensure compliance. No additional audit schedule for training records needs to be developed.

T-2-84

Section 8.5.5 was a typo, the text has been corrected to refer to Section 5.3 in Permit Attachment 5, Hanford Facility Personnel Training Program.

T-2-85

Thank you for your comment, however the wording "introductory" and "continuing" training, is consistent with language detailed in WAC 173-303-330.

T-2-86

Ecology agrees, Permit Attachment 5 does not contain a list of job titles or position descriptions. Section 8.6, Job Titles and Job Description has been revised to read "The Job titles and positions are specified in WTP Dangerous Waste Training Plan which will be maintained in the Facility Operating Record, as detailed in Permit Condition II.C and III.10.C.7."

T-2-87

Thank you for your comment, a footnote was added to define Dangerous Waste Training Plan (DWTP) as suggested.

T-2-88

As stated previously, Table 8-1 is currently provided as an example table detailing training requirements. As the facility finalizes the operating procedures these example tables will be updated as appropriate. Ecology appreciates your input, it will be considered as the Facility Specific Training Plans are finalized prior to Laboratory operations.

## **APPENDIX A: COPIES OF ALL PUBLIC NOTICES**

Public notices for this comment period:

1. Focus Sheet
2. Statement of Basis
3. Classified advertisement in the *Tri-City Herald*
4. Notices sent to the Hanford-Info email list

# Waste Treatment and Immobilization Plant Analytical Laboratory Public Comment Period

## Public Comment Period

December 4, 2017, through  
January 19, 2018

## Submit comments to:

Please submit comments  
electronically (preferred) via:  
[http://wt.ecology.commenting  
ut.com/?id=c4H9a](http://wt.ecology.commenting.ut.com/?id=c4H9a)

Send by U.S. Mail, or  
hand-deliver to:

Daina McFadden  
Department of Ecology  
3100 Port of Benton Blvd  
Richland WA 99354

## For more information:

Dan McDonald  
509-372-7950  
[Dan.McDonald@ecy.wa.gov](mailto:Dan.McDonald@ecy.wa.gov)

## Public Hearing

A public hearing is not  
scheduled, but if there is  
enough interest, we will  
consider holding one.

To request a hearing contact:  
Daina McFadden  
509-372-7950  
[Hanford@ecy.wa.gov](mailto:Hanford@ecy.wa.gov)

## Public Comment Invited

The Washington State Department of Ecology (Ecology) is proposing a modification to the Hanford Facility Resource Conservation and Recovery Act Permit, Revision 8C (Hanford Site-Wide Permit). The proposed change is in Part III, Operating Unit Group 10 of the Hanford Site-Wide Permit.

This change affects the Dangerous Waste Portion for the Treatment, Storage, and Disposal of Dangerous Waste for the Waste Treatment and Immobilization Plant (WTP) Permit.

Ecology invites you to review and comment on this proposed WTP Permit Modification. The 45-day public comment period is December 4, 2017, through January 19, 2018. See the box to the left on how to submit comments and ask for more information.

## The Permittees are:

U.S. Department of Energy Office of River Protection  
P.O. Box 450  
Richland, Washington 99352

Bechtel National, Inc.  
2435 Stevens Center Place  
Richland, Washington 99354

This Class 3 permit modification (8C.2017.4D) focuses on the operations of the Analytical Laboratory (Lab) and provides the operating details for the Analytical Lab under the Direct-Feed Low-Activity Waste configuration.

This Class 3 permit modification is one of many changes to the original WTP Permit. Periodic updates allow the Permittees to continue construction while designing other parts of the WTP. Ecology classifies all permit modifications in accordance with [Washington Administrative Code \(WAC\) 173-303-830](#).

### Public Comment Period Scope

Ecology has finalized draft permit conditions to support the proper operation of the Analytical Lab. These draft conditions can be reviewed in Permit Conditions III.10.L, Analytical Laboratory Specific Operating Conditions.

Updates to Permit Condition Tables III.10.E.D and III.10.E.P are provided to reflect the current operations information.

Permit Conditions III.10.C.16 for Secondary Containment Devices and corresponding tables are also included in this modification for addition to the existing WTP Permit.

The current WTP permit contains design information related to construction of the Analytical Lab. This design information will remain in the WTP permit until Ecology has confirmed that construction of the Analytical Lab is certified completed.

### Why It Matters

The proposed permit changes affect the Waste Treatment and Immobilization Plant (WTP). The WTP is located on the Hanford Site in southeastern Washington.

The plant will immobilize in glass 56 million gallons of dangerous radioactive and chemical waste stored in 177 underground storage tanks at Hanford.

Some waste from the tanks has polluted groundwater that flows toward, and can seep into, the Columbia River.

Safely treating tank waste is an important goal to help protect people and the environment.



*Aerial view of the WTP facility*

This public comment period is the second portion of the proposed Class 3 modification to the WTP Permit Analytical Laboratory Operations. Revisions needed to support the operations of the Analytical Laboratory in this modification include:

- Part III, WTP Unit Specific Permit Conditions
- Chapter 4H, Analytical Laboratory
- Chapter 6A, Inspection Plan
- Chapter 8, Personnel Training



*Analytical Laboratory at the WTP facility*

## Public Comment Period Process

Ecology invites you to review and comment on this proposed WTP Permit Modification. See page 1 for comment period dates and information on how to submit comments.

Copies of the proposed modification are located in the Administrative Record and Information Repositories located on page 4. In addition, the proposed modification is online at <http://www.ecy.wa.gov/programs/nwp/commentperiods.htm>.

Ecology will consider and respond to all comments received during the public comment period. We will make our final permitting decision after the close of the comment period. A Response to Comments document will be published with the issuance of the final permit.

### Special Accommodations

To request ADA accommodation, including materials in a format for the visually impaired, call the Nuclear Waste Program at 509-372-7950.

Persons with impaired hearing may call Washington Relay Service at 711. Persons with speech disability may call TTY at 877-833-6341.



3100 Port of Benton Blvd  
Richland, WA 99354

### Hanford's Information Repositories and Document Review Locations

#### **WASHINGTON**

##### **Richland**

Ecology Nuclear Waste Resource Center  
3100 Port of Benton Blvd.  
Richland, WA 99354  
509-372-7950

Department of Energy Administrative Record  
2440 Stevens Drive, Room 1101  
Richland, WA 99354  
509-376-2530

Department of Energy Reading Room  
2770 Crimson Way, Room 101L  
Richland, WA 99354  
509-375-3308

##### **Seattle**

University of WA Suzzallo Library  
P.O. Box 352900  
Seattle, WA 98195  
206-543-5597

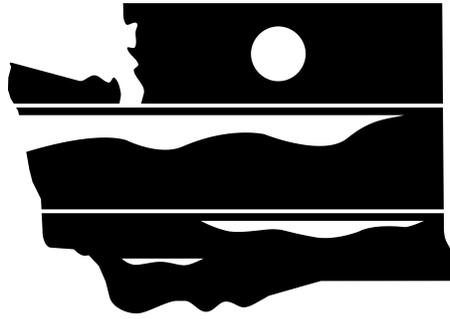
##### **Spokane**

Gonzaga University Foley Center  
502 E Boone Avenue  
Spokane, WA 99258  
509-313-6110

#### **OREGON**

##### **Portland**

Portland State University  
Branford Price Millar Library  
1875 SW Park Avenue  
Portland, OR 97207  
503-725-4542



DEPARTMENT OF  
**ECOLOGY**  
State of Washington

**STATEMENT OF BASIS**

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

November 2017

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## STATEMENT OF BASIS

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

#### **Permittees**

United States Department of Energy  
Office of River Protection  
PO Box 450  
Richland, Washington 99352

Bechtel National, Inc.  
2435 Stevens Center Place  
Richland, Washington 99354

The Washington State Department of Ecology (Ecology) developed this Statement of Basis to fulfill the requirements of Washington Administrative Code ([WAC](#) 173-303-840(2)(f)(iv)).

The Statement of Basis provides information on Ecology's decision to modify the *Hanford Facility Resource Conservation and Recovery Act Permit, Dangerous Waste Portion, Revision 8C, for the Treatment, Storage, and Disposal of Dangerous Waste*, Part III, Operating Unit Group 10, Waste Treatment and Immobilization Plant (WTP), hereafter called the "WTP Permit."

This permit modification focuses on the operations of the Analytical Laboratory (Lab) and provides the operating details for the Analytical Lab under the Direct-Feed Low-Activity Waste configuration.

The Washington State Department of Ecology (Ecology) and the Permittees participated in a series of facilitated workshops to determine the design and scope of an integrated operating permit. The result was the development of the Analytical Laboratory Specific Operating Conditions, Section III.10.L, and updates to Tables III.10.E.D and III.10.E.P which are proposed in this modification. Permit Conditions III.10.C.16 for Secondary Containment Devices and corresponding tables are also included in this modification.

The current WTP Permit contains design information related to construction of the Analytical Lab. As the Analytical Lab moves from construction to operations, operating details are necessary. The design information in the permit will be maintained in the WTP Permit until Ecology has confirmed that construction of the Analytical Lab is certified complete.

Ecology chose to prepare a Statement of Basis as described in [WAC 173-303-840\(2\)\(f\)\(iv\)](#), rather than a Fact Sheet.

We prepared a Statement of Basis for previous major WTP permit modifications. This process will be followed for all permit modifications that incorporate similar design package information and other changes to the WTP Permit Conditions.

This Statement of Basis is divided into four sections:

- 1.0 Hanford Facility Resource Conservation and Recovery Act Permit (Site-wide Permit).

- 2.0 The WTP Permitting Process.
- 3.0 Procedures for Reaching a Final Decision on the Draft WTP Permit Modification.
- 4.0 Proposed Modifications to the WTP Permit.

## **1.0 HANFORD FACILITY RESOURCE CONSERVATION AND RECOVERY ACT PERMIT (SITE-WIDE PERMIT)**

Ecology issued the Site-wide Permit in 1994. The Site-wide Permit provides standard and general facility conditions, as well as unit-specific conditions for the operation, closure, and post-closure care of mixed and dangerous waste Treatment, Storage, and Disposal (TSD) units at Hanford. Approximately 40 TSD units are operating or closing under Resource Conservation and Recovery Act final status standards.

Conditions of the Site-wide Permit are presented in six parts:

- Part I Standard Conditions.
- Part II General Facility Conditions.
- Part III Unit-Specific Conditions for Final Status Operating Units.
- Part IV Corrective Action for Past Practice Units.
- Part V Unit-Specific Conditions for Units Undergoing Closure.
- Part VI Unit-Specific Conditions for Units in Post-Closure.

The WTP TSD Unit was added to Part III of the Site-wide Permit on September 25, 2002. The WTP Permit portion was effective on October 25, 2002. The WTP TSD Unit is currently being constructed under final permit status standards.

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.

The WTP Permit is modified as needed, typically one or more times a year, to incorporate Class 1, <sup>1</sup>1, 2, and 3 modifications; Agency-Initiated modifications; and minor changes in grammar, consistency, and presentation.

## **2.0 THE WTP PERMITTING PROCESS**

We are using a phased (or stepped) approach to permit the WTP TSD Unit. The first phase was completed on September 25, 2002, with issuance of a final Dangerous Waste Permit allowing construction of the LAW, PT, HLW, LAB, and BOF facilities to start.

The second phase of permitting is included in the compliance schedule, and requires the Permittees to submit design and other information for Ecology approval before regulated portions of the WTP TSD Unit are constructed.

A compliance schedule for the United States Department of Energy provides Ecology additional detailed information addressing the submittal of design documents necessary to support construction of the rest of the WTP TSD Unit, and its eventual operation.

The third phase of permitting is implementation of the last portion of the compliance schedule. This requires updating portions of the Dangerous Waste Permit Application and then modifying the

WTP Permit prior to facility start-up operations. These portions (for example, Contingency Plan, Closure Plan, and Training Plan) of the WTP Permit are operational in nature and cannot be completed before the design is nearly complete.

When the three phases of permitting are completed, the WTP TSD Unit will comply with all the applicable requirements of [WAC 173-303](#). Then, after receiving written permission from Ecology, the Permittees can begin treatment and storage of dangerous and mixed waste at the WTP.

Originally, the design submittals (second permitting phase) were structured to allow the Permittees to provide design information in roughly the same order as the WTP facilities are constructed.

The design packages start at the base level of the facilities (below-grade levels) and are submitted for regulated areas of each level before construction begins. This process was adjusted for some design packages. When the facility process systems are installed on more than one level, the design packages will address the associated components for each level. This prevents confusion caused by one process system description being segmented into multiple design packages.

The WTP Permit organizes design packages into three general groups by the type of regulated equipment:

1. Primary containment (i.e., tanks, miscellaneous units [evaporators and melters], and containment buildings).
2. Secondary containment.
3. Other associated regulated equipment (i.e., ancillary equipment, equipment associated with miscellaneous units, and instrumentation).

Using tank systems as an example, secondary containment packages include details of the design of secondary containment that must be in place in regulated areas when the floors and walls are built for that level of each facility (for example, the floor slope, and sump locations).

The installation of tanks and other large equipment usually follows construction of the floors and walls. Therefore, a tank package on that level will be included in the WTP Permit before installation. The tank package would contain, for example, structural details for those tanks or miscellaneous units showing nozzle locations, unit volumes, and tank shell thickness.

The last equipment usually installed on a level for a tank system is the ancillary equipment (for example, piping, pumps, process instrumentation, and electrical equipment). Therefore, the ancillary equipment package provides details for the equipment on that level that will be included in the WTP Permit before installation. Information in the package would include, for example, materials of construction, and pump types and their operating limits.

Because each WTP facility consists of multiple levels, many design packages are required. The WTP Permit allows Permittees to reference previously submitted design information, therefore some design packages may consist mostly of references to information already provided.

### **3.0 PROCEDURES FOR REACHING A FINAL DECISION ON THE DRAFT WTP PERMIT MODIFICATION**

The Washington State Hazardous Waste Management Act (Chapter 70.105, Revised Code of Washington) and the rules declared in [WAC 173-303](#) regulate the management of dangerous waste in Washington State.

[WAC 173-303-800](#) requires facilities that treat, store, and/or dispose of dangerous waste to obtain a permit for these activities.

Regulatory requirements for public notice and involvement on permit modifications are described in [WAC 173-303-840](#)(3) and (4). On June 26, 2017 the Permittees submitted a Class 3 Permit Modification request to Ecology for the Analytical Laboratory Operations, which included revised chapters, Lab Specific Operating Conditions and revisions to Tables III.10.E.D and III.10.E.P. The Permittees held a public comment period from **July 3, 2017** through **September 1, 2017**. The Permittees also held a public meeting on August 3, 2017 at the Richland Public Library.

After review of the Permittee's Class 3 Permit Modification submittal, Ecology determined the application complete in accordance with [WAC 173-303-830](#)(4)(c)(vi) and [WAC 173-303-840](#)(1)(b). Ecology has proceeded with drafting the permit to support a second public comment period.

Public comments received from this comment period are addressed by Ecology in a Response to Comments document. This response to comments document accompanies the draft permit modification. The Response to Comments document associated with this Permittee 60-day public comment period is available online at <https://fortress.wa.gov/ecy/publications/SummaryPages/1705013.html>

As required by [WAC 173-303-840](#)(3)(d), draft modifications to the WTP Permit will have at least a 45-day public comment period. The public comment period for this proposed permit modification begins on **December 4, 2017** and ends on **January 19, 2018**.

Comments must be post-marked, received by e-mail, or hand-delivered no later than close of business (5:00 p.m. PST) January 19, 2018. Direct all written comments to:

Daina McFadden  
Washington State Department of Ecology  
3100 Port of Benton Blvd.  
Richland, Washington 99354

Electronic comment link: <http://wt.ecology.commentinput.com/?id=c4H9a>

In accordance with [WAC 173-303-840](#)(10)(c), when a permit is modified, only the conditions subject to modification are open for comment. All other aspects of the existing Permit remain in effect for the duration of the modification.

Ecology will consider and respond to all written comments on this permit modification submitted by the deadline. Ecology will then make a final permit decision, which will become effective 30 days after Ecology provides notice of the decision to the Permittees and to all who commented. If the final decision includes substantial changes to the WTP Permit because of public comment, we will initiate a new public comment period.

A public hearing is not scheduled, but if there is enough interest, Ecology will consider holding one. To request a hearing or for more information, contact:

Daina McFadden  
Washington State Department of Ecology  
(509) 372-7950

After completion of the 45-day public comment period, Ecology will provide a Response to Comments document and a notification of the final permit decision to the Permittees and all others who commented. The final permit decision may be appealed within 30 days after issuance of that decision.

Copies of the WTP Permit, including the proposed permit modification, are available for review at the NWP Resource Center, USDOE Administrative Record, and Hanford Public Information Repositories. For additional information call (509) 372-7950 or email [hanford@ecy.wa.gov](mailto:hanford@ecy.wa.gov).

## **Administrative Record**

### **Richland**

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

United States Department of Energy  
Administrative Record  
2440 Stevens Drive  
Richland, Washington 99354  
(509) 376-2530

## **Hanford Public Information Repositories**

### **Richland**

United States Department of Energy  
Reading Room  
2770 Crimson Way, Room 101L  
Richland, Washington 99354  
(509) 375-3308

### **Seattle**

University of Washington  
Suzzallo Library  
PO Box 352900  
Seattle, Washington 98195  
(206) 543-5597

### **Spokane**

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

### **Portland**

Portland State University  
Branford Price Millar Library

1875 Southwest Park Avenue  
Portland, Oregon 97207  
(503) 725-4542

This Statement of Basis, Public Notice and information for 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, at (509) 372-7950 or [hanford@ecy.wa.gov](mailto:hanford@ecy.wa.gov).

#### **4.0 PROPOSED MODIFICATIONS TO THE WTP PERMIT**

This proposed permit modification focuses on the operations of the Analytical Laboratory (Lab) and provides the operating details for the Analytical Lab under the Direct-Feed Low-Activity Waste configuration.

The Washington State Department of Ecology (Ecology) and the Permittees participated in a series of facilitated workshops to determine the design and scope of an integrated operating permit. The result was the development of the Analytical Laboratory Specific Operating Conditions, Section III.10.L. Updates to Permit Condition Tables III.10.E.D and III.10.E.P, are provided to reflect the current operations information.

In addition, the Permittee's submitted package WTP-001 for Secondary Containment Devices. Ecology accepted the package and it was incorporated into the proposed permit for public review. Revisions needed to support the operations of the Analytical Lab in this modification include:

- Part III, WTP Unit Specific Permit Conditions
- Chapter 4H, Analytical Laboratory
- Chapter 6A, Inspection Plan
- Chapter 8, Personnel Training

The current WTP Permit contains design information related to construction of the Analytical Lab. As the Analytical Lab moves from construction to operations, operating details are necessary. The design information will be maintained in the WTP Permit until Ecology has confirmed that construction of the Analytical Lab is certified complete.

#### **4.1 Incorporation of Class 1 and Class <sup>1</sup>1 Permit Modifications (PCNs) and Permit Equivalency Notices (PENs)**

Previously approved Class 1 and Class <sup>1</sup>1 PCNs and PENs are incorporated through the Quarterly Modifications. There will be no PCNs or PENs incorporated through this proposed modification.

#### **4.2 Supplemental Design Information**

Paper copies of the page changes to the WTP Permit that result from this modification will be placed in the Administrative Record.

The letter issuing the final WTP Permit decision to the Permittees and Hanford contractors will include the current WTP Permit with the modifications on a DVD.

#### **4.3 Identifying Changes in this Proposed Permit Modification**

As the WTP TSD Unit is constructed, Ecology will modify the WTP Permit for many reasons, including to clarify text, add new conditions, delete existing conditions, correct errors, or add information. To communicate the changes, proposed permit modifications will include page changes showing all significant proposed changes to the WTP Permit. The text to be deleted will be struck-out with a single line, and the new text will be redlined. Only the text being changed in the current modification will be indicated by redlines and strikeouts.

Newly added documents and drawings are provided for review in this proposed permit modification. New document and drawing numbers and titles are shown in redline/strikeout text in the affected appendix drawing lists.

When a WTP Permit modification is issued, “clean” pages incorporating permit modifications will be issued to the Permittees and placed in the Administrative Record. All redlines and strikeouts will be removed. Documents and drawings listed in the appendices will not be redlined and will be incorporated by reference only.

Ecology publication number 07-05-006, *Responsiveness Summary* (September 27, 2007), explains the reason for replacing permit version documents with source documents to which the WTP is constructed. Source documents are in a state of constant revision as design details are finalized and additional information is added to provide clarity and to correct typographical errors.

The Permittees use Document Change Notices (DCNs) to track changes not yet incorporated into source documents. In some cases, DCNs are issued at the time of Ecology’s review. These are not provided for public comment, but will appear in the next revision of the WTP Permit for review. Source documents have been replacing permit version documents since September 2007.

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**Legal**

**BILINGUAL PARALEGAL**  
Must have strong organizational, clerical and communication skills, both written and verbal. Must be capable of multi-tasking, self-motivating, and work well as a team member. Must be bilingual. Prior experience in a law office preferred; personal injury experience required.

Mail resume to Tamaki Law, 8900 W. Tucannon Ave., Kennewick, WA 99336, or email [mchang@tamakilaw.com](mailto:mchang@tamakilaw.com) or fax 509-735-7020.

**Management**



**Site Manager**  
WSU Tri-Cities is seeking multiple (4) GEAR UP Site Managers to work at Mabton MS, Stevens MS, Ochoa MS, and Roberts Olds MS in Mabton, Pasco, and Prosser, WA. The position is responsible for providing leadership, collaborative planning, administration, supervising staff, and direct student support to increase postsecondary awareness and readiness. Services include academic support in classrooms, after school programs, campus visits, educational field trips, family events, and college and career exploration. Position requires a Bachelor's degree and three (3) years of professional work experience in student services or related education/experience. Experience leading or directing the work of others. A Master's degree in a related field may substitute for one (1) year of professional work experience. Any combination of relevant education and professional experience may be substituted for the educational requirement on a year-for-year basis. Apply on line by Dec. 13, 2017 at [www.wsujobs.com](http://www.wsujobs.com), position# 76408, #97698, #97703, & #97695. WSU is an EO/AA educator and employer.

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Go To: [www.franklinem.org/jobs](http://www.franklinem.org/jobs)  
For an Application and detailed info, or call 509-545-3546

**Columbia Basin College**  
**Maintenance Mechanic 2**  
FT State-Funded Classified Position  
Salary: \$45,540.00 - \$52,788.00 Annually  
Closing Date: Open Until Filled (1st consideration closes 12/10/17 @ 11:59 p.m. PST)  
CBC seeks a Maintenance Mechanic 2 to perform skilled work in HVAC and related systems. The Maintenance Mechanic 2 reports to the Maintenance Mechanic 4.  
Applications will ONLY be accepted through our website at: <http://www.columbia-basin.edu/jobs>  
CBC is an EEO/AA Employer. Protected groups are encouraged to apply.

**Columbia Basin College**  
**Special Assistant to the President**  
Full Time Exempt \$55,000 - \$65,000 Annually  
Open Until Filled (1st consid. closes 01/02/18 @ 11:59 p.m.)  
CBC seeks a Special Assistant to the President who will serve as a trusted advisor, principal aide and logistics manager to the President working with broad responsibility to carry out a wide range of complex administrative tasks.  
Applications will ONLY be accepted through our website at: <http://www.columbia-basin.edu/jobs>  
CBC is an EEO/AA Employer. Protected groups are encouraged to apply.

**Workplace Campaign Manager 2**, full-time, Kennewick, \$43-\$47K DOQ + benefits. Develops relationships and raises money for United Way of Benton & Franklin Counties with strategies that recruit/retain corporate and workplace donors. Requires 2 years of fundraising or sales experience. For job description, qualifications, application requirements, and deadline, contact [layers@uwbfc.org](mailto:layers@uwbfc.org). AA/EEO Employer.

**Auto Savers**  
Vehicles \$6,000 or less, 4 lines for 14 days  
Sell it fast! Call 586-6181  
Tri-City Herald  
Voice of the Tri-Cities

**ADVERTISEMENT FOR BIDS**  
**Franklin County Irrigation District No. 1**  
Franklin County Irrigation District No. 1 (F.C.I.D.) invites bids for their 2017/2018 Pipeline Project. The Base Bid work involves the replacement of approximately 643 feet of old 6" steel irrigation pipe, 2454 feet of old 8" steel irrigation pipe and 1147 feet of old 10" steel irrigation pipe and appurtenances. There are two Alternate Bid Schedules which involve replacement of approximately 1202 feet of old 6" steel irrigation pipe. The project is located in the West Pasco area of the City of Pasco. All work shall be completed by MARCH 9, 2018.  
Sealed bids for the above described project will be received by F.C.I.D. at: Franklin County Irrigation District No. 1, 4320 Road 111, PO Box 3907, Pasco, Washington 99302, until 11:30 a.m., Monday, December 18, 2017 and then publicly opened and read aloud.  
Each bid must be submitted on the prescribed forms and accompanied by a Certified Check or Bid Bond, payable to F.C.I.D., in the amount not less than 5 percent of the Total Bid Price. The Contract Documents may be examined at the following locations:  
• TRI-CITY CONSTRUCTION COUNCIL, INC., Kennewick, Washington.  
• FRANKLIN COUNTY IRRIGATION DISTRICT, 4320 Road 111, Pasco, Washington.  
Copies of the Contract Documents may be obtained at the District's office at 4320 Road 111, Pasco, WA 99301, upon a non-refundable payment of \$50.00 for each set.  
The Owner reserves the right to waive any informalities or minor defects and to reject any and all Bids. Any Bid may be withdrawn prior to the above scheduled time for the opening of Bids or authorized postponement thereof. Any Bid received after the time and date specified shall not be considered. No Bidder may withdraw a Bid within 30 days after the actual date of the opening thereof. Should there be reasons why the Contract cannot be awarded within the specified period; the time may be extended by mutual agreement between the Owner and Bidder. FRANKLIN COUNTY IRRIGATION DISTRICT Robin Brown, FCID Secretary November 13, 2017 #3389104 11/26 & 12/03/2017

**CITY OF PASCO**  
**NOTICE OF SPECIAL MEETING**  
PLEASE TAKE NOTICE that the Pasco City Council will hold a Special Meeting on Saturday, December 16, 2017 from 8:00 a.m. to Noon, in the City Council Chambers, at 525 North 3rd Avenue, for newly elected Councilmember Orientation. Daniela Erickson, City Clerk #3416136 12/03/2017

**BENTON COUNTY WATER CONSERVANCY BOARD**  
**PUBLIC MEETING/HEARING NOTICE**  
Notice is hereby given that the Benton County Water Conservancy Board has received active applications on proposed water right change/transfers, and a public hearing is available to interested parties on December 5, 2017, at 4:00 p.m., at the office of the Pacific Northwest Project, 3030 W. Clearwater, Ste. 205-A, Kennewick, WA 99336, or for additional information, call 509-783-1623. Received Application by: ConAgra Foods/Lamb Weston, P.O. Box 1900, Pasco, WA 99302-1900. The application relates to the following water right and priority date: SWP-16571(D)P, issued March 20, 2013, OCR-Ecology, priority date of February 4, 1971, for tracking purposes, BENT-17-03. The existing right authorizes annual use for 19.33 cfs, for 3,685 acre-ft., for irrigation of 867 acres, February 15 to October 31. The existing point of withdrawal is all within the SW1/4 of NE1/4, of Section 8, T.5N, R.26 EWM; and the existing place of use is all within the W1/2 of NW1/4 and SW1/4 of Section 22, and W1/2 of Section 27, and portions of Section 33 per permit description, and portions of Section 34 (including W3/4), and all within T.6N, R.26 EWM. The overall request is for a permanent change, adding a point of diversion and place of use. The existing place of use will remain the same; and the proposed added point of diversion will include Govt. Lot 1, Section 4, T.4N, R.24 EWM; and the added place of use is all within the S1/2 of S1/2 of Section 27, and N1/2 of N1/2 of Section 34 T.5N, R.24 EWM. There is no change to period of use or instantaneous use, purpose of use, or allowed irrigated acres (t.c. ta). TAKE NOTICE: per WAC 173-153-080 administrative rule for public notice information, interested parties are hereby directed to request the actual application documentation, and the detailed legal descriptions therein, from the Water Board, at 509-783-1623.  
Under WADOE Rule WAC 173-153 and other agency regulations, any protests or objections to the approval of this application may be filed with the Department of Ecology and must include a detailed statement of the basis for objections; protests must be accompanied by a fifty dollar (\$50) recording fee and filed with the Cashiering Section, State of Washington, Department of Ecology, P.O. Box 47611, Olympia, WA 98504-7611 within thirty (30) days from the date of publication. Any interested party may submit comments, objections, and other information to the board regarding this application. The comments and information may be submitted in writing or verbally at any public meeting of the board held to discuss or decide on the application. Comments should include: name, address, and phone number of commenting party; identification of the change/transfer receiving comments; and detailed information or documentation to substantiate

facts presented within the comments. All comments are noted within the Report of Examination and Record of Decision affecting the subject application. This application will be on the board agenda during its regular meetings, contact the board for meeting schedules. Written comments or information for the board may be sent to: Attention, Dr. Darryl Olsen, BCWCB, 3030 W. Clearwater, Ste., 205-A, Kennewick, WA 99336. #3410104 12/03/2017

**INVITATION TO BID**  
**CONCRETE SEALING PROJECT**  
**YAKIMA COUNTY, WASHINGTON**  
Bidders are invited to submit sealed bids required for sealing of concrete lining. The principle work to be performed are preparation of concrete lining by sand blasting and application of the two-part polyurea sealant. Bidders will comply with any applicable laws of the State of Washington pertaining to the performance of public works contracts, including compliance with laws pertaining to prevailing wages on public works contracts. Bids shall be on unit price basis per schedule and in U.S. dollars. Award will be based upon the lowest responsible responsive bid as defined in RCW 39.04. All work related to this contract must be completed by **March 10, 2018**.  
The Roza Irrigation District (District), P.O. Box 810 / 125 S. 13th Street, Sunnyside, WA 98944, will receive bids until **2:30 P.M., December 15, 2017**. Bids received after the time of announced opening will not be accepted and will be returned unopened. Bidder's failure to perform onsite inspection for field conditions will subject bid to being declared non-responsive.  
For a copy of the Bidding Documents, use the Web link for **Concrete Sealing Project** on the District's web page [www.roza.org](http://www.roza.org). A pre-bid site visit is scheduled for **1:30 P.M. on Wednesday, December 13, 2017**, at the Project Site, east of Nightingale Road and the Roza Canal, Wapato, WA. A representative of each bidder is required to make a pre-bid site visit. We will travel to see an equipment ramp from this location as part of the meeting. Each bid shall be accompanied by a bid security in certified or cashier's check or bid bond on District form and in an amount equal to at least 5% of the amount of such bid. All bid proposals must be on the form provided and if Successful Bidder fails to enter into the contract within the time specified in the specifications, the bid proposal deposit shall be forfeited. The Successful Bidder will be required to furnish the additional bond(s) prescribed in the Bidding Documents and be required to sign the Non-Collusion and Debarment Affidavit, as found in the Bidding Documents. In order to submit a Bid on public work, Bidders and their Subcontractors shall hold such licenses and registrations as required by State Statutes and Codes and federal and local Laws and Regulations. Bidders will be required to comply with State of Washington RCW 39.30.060 relating to identification of Subcontractors.  
The District reserves the right to reject any or all bids and to waive any irregularities as informalities.  
Wayne Sonnichsen  
Roza Irrigation District  
Engineering Manager  
#3416893 12/03 & 12/10/2017

**Waste Treatment and Immobilization Plant Analytical Laboratory Public Comment Period**  
The Washington State Department of Ecology (Ecology) is proposing a modification to the Hanford Facility Resource Conservation and Recovery Act Permit, Revision 8C (Hanford Site-Wide Permit). The proposed change is in Part III, Operating Unit Group 10 of the Hanford Site-Wide Permit.  
This change affects the Dangerous Waste Portion for the Treatment, Storage, and Disposal of Dangerous Waste for the Waste Treatment and Immobilization Plant (WTP) Permit.  
Ecology invites you to review and comment on this proposed WTP Permit Modification. The 45-day public comment period is **December 4, 2017, through January 19, 2018**.  
Please submit comments by **January 19, 2018**. Electronic submission (preferred): <http://wt.ecology.commentinput.com/?id=c4H9a>  
Mail or hand-deliver to:  
Daina McFadden  
3100 Port of Benton Blvd  
Richland WA 99354  
A public hearing is not scheduled, but if there is enough interest, we will consider holding one. To request a hearing contact:  
Daina McFadden  
509-372-7950  
[Hanford@ecy.wa.gov](mailto:Hanford@ecy.wa.gov)  
For more information, contact:  
Dan McDonald  
509-372-7950  
[Hanford@ecy.wa.gov](mailto:Hanford@ecy.wa.gov)  
The Permittees are:  
U.S. Department of Energy Office of River Protection  
P.O. Box 450  
Richland, Washington 99352  
Bechtel National, Inc.  
2435 Stevens Center Place  
Richland, Washington 99354  
This Class 3 permit modification (8C.2017.4D) focuses on the operations of the Analytical Laboratory (Lab) and provides the operating details for the Analytical Lab under the Direct-Feed Low-Activity Waste configuration.  
This Class 3 permit modification is one of many changes to the original WTP Permit. Periodic updates allow the Permittees to continue construction while designing other parts of the WTP. Ecology classifies all permit modifications in accordance with Washington Administrative Code (WAC) 173-303-830.  
Ecology has finalized draft permit condi-

tions to support the proper operation of the Analytical Lab. These draft conditions can be reviewed in Permit Conditions III.10.L, Analytical Laboratory Specific Operating Conditions. Updates to Permit Condition Tables III.10.E.D and III.10.E.P are provided to reflect the current operations information. Permit Conditions III.10.C.16 for Secondary Containment Devices and corresponding tables are also included in this modification for addition to the existing WTP Permit.  
The current WTP permit contains design information related to construction of the Analytical Lab. This design information will remain in the WTP permit until Ecology has confirmed that construction of the Analytical Lab is certified completed.  
This public comment period is the second portion of the proposed Class 3 modification to the WTP Permit Analytical Laboratory Operations. Revisions needed to support the operations of the Analytical Laboratory in this modification include:  
• Part III, WTP Unit Specific Permit Conditions  
• Chapter 4H, Analytical Laboratory  
• Chapter 6A, Inspection Plan  
• Chapter 8, Personnel Training  
Copies of the proposed modification are located in the Administrative Record and Information Repositories (below). In addition, the proposed modification is online at <http://www.ecy.wa.gov/programs/nwp/commentperiods.htm>.  
Ecology will consider and respond to all comments received during the public comment period. We will make our final permitting decision after the close of the comment period. A Response to Comments document will be published with the issuance of the final permit.  
To request ADA accommodation, including materials in a format for the visually impaired, call the Nuclear Waste Program at 509-372-7950.  
Persons with impaired hearing may call Washington Relay Service at 711. Persons with speech disability may call TTY at 877-833-6341.  
Richland  
Ecology Nuclear Waste Resource Center  
3100 Port of Benton Blvd.  
Richland, WA 99354  
509-372-7950  
Department of Energy Administrative Record  
2440 Stevens Drive, Room 1101  
Richland, WA 99354  
509-376-2530  
Department of Energy Reading Room  
2770 Crimson Way, Room 101L  
Richland, WA 99354  
509-375-3308  
Portland  
Portland State University  
Brannford Price Miller Library  
1875 SW Park Avenue  
Portland, OR 97207  
503-725-4542  
Seattle  
University of WA Suzzallo Library  
P.O. Box 352900  
Seattle, WA 98195  
206-543-5597  
Spokane  
Gonzaga University Foley Center  
502 E Boone Avenue  
Spokane, WA 99258  
509-313-6110  
#3394592 12/03/2017

**CITY OF RICHLAND**  
**NOTICE OF CITY COUNCIL EXECUTIVE SESSION**  
The City Council will hold an executive session per RCW 42.30.110 (1) (g) to discuss the performance review of public employee for 60 minutes in the City Manager's Conference Room in the Richland City Hall Annex Building, 975 George Washington Way, on December 5, 2017, at 6:00-7:00 p.m.. For more information, please contact Marcia Hopkins, City Clerk, at [mhopkins@ci.richland.wa.us](mailto:mhopkins@ci.richland.wa.us) or 509-942-7389. #3389284 12/03/2017

In the Superior Court of the State of Washington for the County of Benton  
**VIOLA B. SULLINS, Plaintiff,**  
vs.  
**SUNSET PRODUCE, LLC, a limited liability company;**  
**SUNHEAVEN FARMS, LLC, a limited liability company;**  
and **ARMANDO VILLALOBOS, an individual, Defendants.**  
No. 17-2-02780-1  
The State of Washington to the said Defendant Armando Villalobos:  
You are hereby summoned to appear within sixty (60) days after the date of the first publication of this summons, to wit, within sixty (60) days after the day of November 30, 2017, and defend the above entitled action in the above entitled court, and answer the complaint Plaintiff Viola B. Sullins, and serve a copy of your answer upon the undersigned attorneys for Plaintiff Viola B. Sullins, at their office below stated; and in case of your failure so to do, judgment will be rendered against you according to the demand of the complaint, which has been filed with the clerk of said court.  
Plaintiff Viola B. Sullins was struck by a forklift driven by Sunset Produce employee Armando Villalobos on December 22, 2015, causing injuries and damages to the Plaintiff.  
By: s/Nathan W. Henry  
Nathan W. Henry, WSBA #36720  
Reinger Barber Henry, PLLC  
114-A Vista Way  
Kennewick, WA 99336  
(509) 735-0535  
Benton County, Washington  
#3416285 12/03, 12/10, 12/17, 12/24, 12/31, & 01/07/2018

**CITY OF RICHLAND**  
**NOTICE OF PUBLIC HEARING**  
The Richland City Council will conduct a public hearing at its regular meeting on Tuesday, December 5, 2017 at 7:30 p.m. in the Council Chamber, Richland City Hall, 505 Swift Blvd, Richland, WA to receive public comments regarding the proposed budget amendments to the 2017 budget. The first reading of the budget amendment ordinance is scheduled for December 5, 2017, with passage planned for December 19, 2017. A copy of the proposal will be available for review at the City Clerk's Office or on the Government section of the city website at [www.ci.richland.wa.us](http://www.ci.richland.wa.us) beginning on December 1, 2017. For information contact Brandon Allen at 509-942-7302 or [ballen@ci.richland.wa.us](mailto:ballen@ci.richland.wa.us). #3394638 12/03/2017

**CITY OF RICHLAND**  
**NOTICE OF PUBLIC HEARING**  
The Richland City Council will conduct a public hearing at its regular meeting on Tuesday, December 5, 2017, at 7:30 p.m. in the Council Chamber, Richland City Hall, 505 Swift Boulevard, Richland, WA. The purpose of the hearing is to receive public comments regarding the proposed ordinance to authorize the City to assume the rights, powers, functions and obligations of the Richland Transportation Benefit District pursuant to Chapter 36.74 RCW. #3407240 11/6 & 12/03/2017

**RESOLUTION NO. 2017-17**  
A RESOLUTION of the City of Richland establishing a hearing date to consider an ordinance to authorize the City to assume the rights, powers, functions, and obligations of the City of Richland Transportation Benefit District.  
WHEREAS, Chapters 36.73 RCW and RCW 35.21.225 authorize cities to establish a transportation benefit district within the city's jurisdiction for the purpose of acquiring, constructing, improving, providing, and funding transportation improvements within the district that are consistent with existing state, regional, and local transportation plans and necessitated by existing or reasonably foreseeable congestion levels; and  
WHEREAS, the City Council of the City of Richland passed Ordinance No. 02-17 establishing the Richland Transportation Benefit District as authorized by RCW 35.21.225 and subject to the provisions of RCW 36.73; and  
WHEREAS, the Richland Transportation Benefit District includes the entire City of Richland as the boundaries currently exist or as are expanded upon annexation; and  
WHEREAS, pursuant to RCW 36.73.030(3), the members of the Richland City Council, acting ex officio and independently, constitute the governing body of the Richland Transportation Benefit District; and  
WHEREAS, the State Legislature passed Second Engrossed Substitute Bill 5987, Chapter 44, Laws of 2015 ("Senate Bill 5987"), effective July 15, 2015, now codified as Chapter 36.74 RCW, which authorizes a city to assume the rights, powers, functions, and obligations of a transportation benefit district established by a city; and  
WHEREAS, in order to assume the rights, powers, functions, and obligations of a transportation benefit district established by a city, the city legislative authority must adopt an ordinance or resolution indicating an intent to conduct a hearing concerning the assumption of such rights, powers, functions, and obligations; and  
WHEREAS, if the city legislative authority adopts such an ordinance or resolution of intention, the ordinance or resolution must set a time and place at which the city authority will consider the proposed assumption of the rights, powers, functions, and obligations of the transportation benefit district, and must state that all persons interested may appear and be heard; and  
WHEREAS, the ordinance or resolution of intention must be published at least two times during the two weeks preceding the scheduled hearing in newspapers of daily general circulation or published in the city in which the transportation benefit district is to be located; and  
WHEREAS, as authorized by RCW 36.74.020, the Richland City Council desire to schedule a hearing to consider an ordinance authorizing the City to assume the rights, Adopted 11/21/17 2 Resolution No. 217-17 powers, functions, and obligations of the Richland Transportation Benefit District.  
NOW, THEREFORE, BE IT RESOLVED by the City Council of the City of Richland as follows:

Section 1. A public hearing will be held on Tuesday, December 5, 2017 at 7:30 p.m. or later in the City Council Chambers in the Richland City Hall, located at 505 Swift Boulevard, Richland, Washington, to consider and take public testimony on the proposed ordinance to authorize the City to assume the rights, powers, functions, and obligations of the Richland Transportation Benefit District pursuant to Chapter 36.74 RCW. All persons interested may appear and be heard at the hearing.  
Section 2. Notice of the public hearing shall be published at least two times during the two weeks preceding the hearing. BE IT FURTHER RESOLVED that this resolution shall take effect immediately.  
ADOPTED by the City Council of the City of Richland, Washington, at a regular meeting on the 21st day of November, 2017.  
ROBERT J. THOMPSON  
Mayor  
ATTEST:  
MARCIA HOPKINS  
City Clerk  
APPROVED AS TO FORM:  
HEATHER KINTZLEY  
City Attorney  
#3407324 11/26 & 12/03/2017

**CITY OF RICHLAND**  
**NOTICE OF CITY COUNCIL EXECUTIVE SESSION**  
The City Council will hold an executive session per RCW 42.30.110 (1) (g) to discuss the performance review of public employee for 60 minutes in the City Manager's Conference Room in the Richland City Hall Annex Building, 975 George Washington Way, on December 5, 2017, at 6:00-7:00 p.m.. For more information, please contact Marcia Hopkins, City Clerk, at [mhopkins@ci.richland.wa.us](mailto:mhopkins@ci.richland.wa.us) or 509-942-7389. #3389284 12/03/2017

In the Superior Court of the State of Washington for the County of Benton  
**VIOLA B. SULLINS, Plaintiff,**  
vs.  
**SUNSET PRODUCE, LLC, a limited liability company;**  
**SUNHEAVEN FARMS, LLC, a limited liability company;**  
and **ARMANDO VILLALOBOS, an individual, Defendants.**  
No. 17-2-02780-1  
The State of Washington to the said Defendant Armando Villalobos:  
You are hereby summoned to appear within sixty (60) days after the date of the first publication of this summons, to wit, within sixty (60) days after the day of November 30, 2017, and defend the above entitled action in the above entitled court, and answer the complaint Plaintiff Viola B. Sullins, and serve a copy of your answer upon the undersigned attorneys for Plaintiff Viola B. Sullins, at their office below stated; and in case of your failure so to do, judgment will be rendered against you according to the demand of the complaint, which has been filed with the clerk of said court.  
Plaintiff Viola B. Sullins was struck by a forklift driven by Sunset Produce employee Armando Villalobos on December 22, 2015, causing injuries and damages to the Plaintiff.  
By: s/Nathan W. Henry  
Nathan W. Henry, WSBA #36720  
Reinger Barber Henry, PLLC  
114-A Vista Way  
Kennewick, WA 99336  
(509) 735-0535  
Benton County, Washington  
#3416285 12/03, 12/10, 12/17, 12/24, 12/31, & 01/07/2018

To place your Legal Announcement, Call 585-7213.

**From:** McFadden, Daina (ECY)  
**To:** [HANFORD-INFO@LISTSERV.WA.GOV](mailto:HANFORD-INFO@LISTSERV.WA.GOV)  
**Subject:** 30-Day Advance Notice - Waste Treatment and Immobilization Plant Analytical Laboratory Public Comment Period  
**Date:** Friday, October 20, 2017 8:39:27 AM

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*This is a message from the Department of Ecology*

## Waste Treatment and Immobilization Plant Analytical Laboratory Public Comment Period 30-Day Advance Notice

The Washington State Department of Ecology is providing notification of a 45-day public comment period starting mid to late November 2017. This comment period will address proposed modifications to the operations of the Analytical Laboratory (Lab) and provides the operating details for the Analytical Lab under the Direct-Feed Low-Activity Waste configuration for the Waste Treatment and Immobilization Plant (WTP) Permit. The Permittee(s) are the U.S. Department of Energy Office of River Protection and Bechtel National, Inc. The WTP is located on the Hanford Site in southeastern Washington.

### What Changes are Being Proposed?

Ecology has finalized draft permit conditions to support the proper operation of the Analytical Lab. These draft conditions can be reviewed in Permit Conditions III.10.L, Analytical Laboratory Specific Operating Conditions. Updates to Permit Condition Tables III.10.E.D and III.10.E.P, are provided to reflect the current operations information. Chapters 4H Analytical Laboratory, 6A Inspection Plan, and 8 Personnel Training are also included in this draft permit modification for review.

In addition to the draft conditions to support the Analytical Lab operations, Permit Conditions III.10.C.16 for Secondary Containment Devices and corresponding tables are also being included in this modification for inclusion to the existing WTP Permit.

The current WTP Permit contains design information related to construction of the Analytical Lab. This design information will remain in the WTP permit until Ecology has confirmed that construction of the Analytical Lab is certified completed.

### Public Hearing

A public hearing is not scheduled, but if there is enough interest, we will consider holding one. To request a hearing or for more information, contact:

Daina McFadden  
[Hanford@ecy.wa.gov](mailto:Hanford@ecy.wa.gov)  
509-372-7950



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**From:** McFadden, Daina (ECY)  
**To:** [HANFORD-INFO@LISTSERV.WA.GOV](mailto:HANFORD-INFO@LISTSERV.WA.GOV)  
**Subject:** Waste Treatment and Immobilization Plant Analytical Laboratory Public Comment Period Notification  
**Date:** Monday, December 4, 2017 9:23:27 AM

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## Waste Treatment and Immobilization Plant Analytical Laboratory Public Comment Period Notification

The Washington State Department of Ecology is holding a 45-day public comment period starting **December 4, 2017, through January 19, 2018**. This comment period addresses proposed modifications to the operations of the Analytical Laboratory (Lab) and provides the operating details for the Analytical Lab under the Direct-Feed Low-Activity Waste configuration for the Waste Treatment and Immobilization Plant (WTP) Permit. The Permittee(s) are the U.S. Department of Energy Office of River Protection and Bechtel National, Inc. The WTP is located on the Hanford Site in southeastern Washington.

### What Changes are Being Proposed?

Ecology has finalized draft permit conditions to support the proper operation of the Analytical Lab. These draft conditions can be reviewed in Permit Conditions III.10.L, Analytical Laboratory Specific Operating Conditions. Updates to Permit Condition Tables III.10.E.D and III.10.E.P, are provided to reflect the current operations information. Chapters 4H Analytical Laboratory, 6A Inspection Plan, and 8 Personnel Training are also included in this draft permit modification for review.

In addition to the draft conditions to support the Analytical Lab operations, Permit Conditions III.10.C.16 for Secondary Containment Devices and corresponding tables are also being included in this modification for inclusion to the existing WTP Permit.

The current WTP Permit contains design information related to construction of the Analytical Lab. This design information will remain in the WTP permit until Ecology has confirmed that construction of the Analytical Lab is certified completed.

Please submit comments by **January 19, 2018**.

Electronic submission (preferred):

<http://wt.ecology.commentinput.com/?id=c4H9a>

Mail or hand-deliver to:

Daina McFadden  
3100 Port of Benton Blvd  
Richland WA 99354

### Public Hearing

A public hearing is not scheduled, but if there is enough interest, we will consider holding one.

To request a hearing contact:

Daina McFadden  
509-372-7950

[Hanford@ecy.wa.gov](mailto:Hanford@ecy.wa.gov)

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For more information, contact:

Dan McDonald

509-372-7950

[Hanford@ecy.wa.gov](mailto:Hanford@ecy.wa.gov)



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**From:** McFadden, Daina (ECY)  
**To:** [HANFORD-INFO@LISTSERV.ECOLOGY.WA.GOV](mailto:HANFORD-INFO@LISTSERV.ECOLOGY.WA.GOV)  
**Subject:** Waste Treatment and Immobilization Plant Analytical Laboratory Public Comment Period Notification - Update  
**Date:** Tuesday, December 5, 2017 10:29:22 AM

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## Waste Treatment and Immobilization Plant Analytical Laboratory Public Comment Period Notification

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In addition to the draft conditions to support the Analytical Lab operations, Permit Conditions III.10.C.16 for Secondary Containment Devices and corresponding tables are also being included in this modification for inclusion to the existing WTP Permit.

The current WTP Permit contains design information related to construction of the Analytical Lab. This design information will remain in the WTP permit until Ecology has confirmed that construction of the Analytical Lab is certified completed.

### How to Comment

Ecology invites you to review and comment on this proposed WTP Permit Modification. Copies of the proposed modification are located in the Administrative Record and Information Repositories. In addition, the proposed modification is online at <http://www.ecy.wa.gov/programs/nwp/commentperiods.htm>.

Please submit comments by **January 19, 2018**.

Electronic submission (preferred):

<http://wt.ecology.commentinput.com/?id=c4H9a>

Mail or hand-deliver to:

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