

Response to Public Comments

**Proposed Class 2 Permit Updates to the
Liquid Effluent Retention Facility and
200 Area Effluent Treatment Facility
Section of the Hanford Facility Dangerous
Waste Permit**

January 20, 2014 – March 21, 2014

Summary of a public comment period and responses to comments

PUBLICATION AND CONTACT INFORMATION

This publication is available on the Department of Ecology's website at <https://fortress.wa.gov/ecy/publications/SummaryPages/1405007.html>

For more information contact:

Stacy Nichols, Environmental Specialist
Nuclear Waste Program
3100 Port of Benton Boulevard
Richland, WA 99354

Phone: 509-372-7950

Hanford Cleanup Line: 800-321-2008

Email: Hanford@ecy.wa.gov

Washington State Department of Ecology - www.ecy.wa.gov

- Headquarters, Lacey 360-407-6000
- Northwest Regional Office, Bellevue 425-649-7000
- Southwest Regional Office, Lacey 360-407-6300
- Central Regional Office, Yakima 509-575-2490
- Eastern Regional Office, Spokane 509-329-3400

Ecology publishes this document to meet the requirements of [Washington Administrative Code 173-303-840 \(9\)](#).

If you need this document in a format for the visually impaired, call the Nuclear Waste Program at 509-372-7950. Persons with hearing loss can call 711 for Washington Relay Service. Persons with a speech disability can call 877-833-6341.

Response to Public Comments

**Proposed Class 2 Permit Updates to the
Liquid Effluent Retention Facility and
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Section of the Hanford Facility Dangerous
Waste Permit**

January 20, 2014 – March 21, 2014

Department of Ecology
Nuclear Waste Program
3100 Port of Benton Boulevard
Richland, Washington 99354

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Table of Contents

Introduction..... 1
Reasons For Issuing The Permit 1
Public Involvement Actions..... 2
List Of Commenters..... 3
Response To Comments 3
Appendix A: Copies Of All Public Notices
Appendix B: Copies Of All Written Comments
Appendix C: Ecology Letter Documenting Final Permit Decision

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INTRODUCTION

The Washington State Department of Ecology’s Nuclear Waste Program (NWP) 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, dangerous waste regulations require public comment periods to allow the public to review the change(s) and provide formal feedback. (See [Washington Administrative Code \[WAC\] 173-303-830](#) for types of permit changes.)

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 and any related public hearings.

This Response to Comments is prepared for:

Comment period: Proposed Class 2 Permit Updates to the Liquid Effluent Retention Facility and 200 Area Effluent Treatment Facility (LERF-ETF) sections of the Hanford Facility Dangerous Waste Permit, January 20, 2014 – March 21, 2014

Permit: *Hanford Facility Resource Conservation and Recovery Act Permit for the Treatment, Storage, and Disposal of Dangerous Waste, (WA 7980008967)*

Original issuance date: January 28, 1998

Draft effective date: April 08, 2014

To see more information related to the Hanford Site and nuclear waste in Washington, please visit our website: www.ecy.wa.gov/programs/nwp.

REASONS FOR ISSUING THE PERMIT

The type of permit change in this request is termed a “Class 2 modification.” These modifications are more significant than “Class 1” modifications, and less significant than “Class 3” modifications. A table in WAC 173-303-830 describes changes and what class they are.

This update for Hanford’s dangerous waste permit addresses process information, inspections, and preparedness and prevention sections of the permit.

Key changes in this modification are to:

- Reduce the frequency at which specified alarms, leak detectors, and level and pressure indicators are monitored.
- Allow for an additional method to be used to calculate the leakage through the primary liner of the LERF basins.

PUBLIC INVOLVEMENT ACTIONS

Ecology's NWP encouraged public comment on this Class 2 permit change during a 60-day public comment period held January 20 through March 21, 2014.

Under WAC 173-303-830(4)(b), the permittee is responsible to hold a comment period and a public meeting for Class 2 permit changes. The permittee is the United States Department of Energy (USDOE).

To meet the requirements, USDOE:

- Mailed a notice announcing the comment period to the 1,988 interested members of the public on the postal list.
- Featured the comment period on its website.
- Placed an advertisement in the *Tri-City Herald* on January 21.
- Sent a notice announcing the start of the comment period to the [Hanford-Info email list](#), which then had 1,266 recipients.
- Held a public meeting on February 11, 2014. Members of the public attended, but did not submit any written comments.

The NWP also provided a redline-strikeout version of the permit on our comment period website.

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

- Public notice
- Transmittal letter
- Tabular Summary of proposed changes
- Addendum C, Process Information (showing proposed changes)
- Addendum F, Preparedness and Prevention (showing proposed changes)
- Addendum I, Inspection Requirements (showing proposed changes)
- Temporary Authorization Request

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

1. Public notice (focus sheet).
2. Advertisement in the *Tri-City Herald*.
3. Notices sent to the Hanford-Info email list.

NWP's letter documenting the final permit modification decision is in [Appendix C](#) of this document.

LIST OF COMMENTERS

The table below lists the names of organizations or individuals who submitted a comment on the LERF-ETF permit modification, and where you can find Ecology's response to the comments.

Commenter	Organization	Comment Number	Page Number
Russell Jim	Yakama Nation	1-3	3-4
A Stakeholder	Citizen	4-5	4

RESPONSE TO COMMENTS

Ecology accepted comments from January 20 until March 21, 2014. We received two sets of public comments. This section provides the comments that we received during the public comment period and our responses. (RCW 34.05.325(6)(a)(iii)). Comments are grouped by individual and each comment is addressed separately. NWP's responses directly follow each comment in italic font. Verbatim copies of all written comments are in [Appendix B](#).

Comment #1 from the Yakama Nation

It is unclear how fluid levels in each leachate sump can be manually maintained if the system is currently designed to operate under automated controls.

Ecology Response: The leachate rate is typically less than 10 gallons per day, so the operators usually pump the leachate manually (about once a month) rather than wait until the automatic system kicks in.

The system has a switch in the field that can be set to one of three positions: off, manual, or automatic. When an operator wishes to pump the system manually, they position the switch from automatic to manual. When the transfer is complete, they position the switch back to automatic.

Comment #2 from the Yakama Nation

It's the YN ERWM program's understanding is that currently other instrumentation provided is real-time continuous level monitoring and this information is sent to the 242-A Evaporator control room. YN understood this information would continue to be recorded and monitored daily rather than continuously. YN requests clarification and editing to ensure such real-time data continues to be provided and recorded in the Control Room.

Ecology Response: The real-time continuous level reading at LERF is in the ETF control room. The instrument is always operating/recording, but when 242-A Evaporator is not transferring waste to LERF, there may not be an operator in the control room to monitor it. In this case, the permit requires an operator to enter the control room and take readings daily.

When 242-A Evaporator is transferring waste to LERF, the permit requires an operator be present in the ETF control room to continuously monitor the LERF level (and transfer line leak detectors). In this case, an operator stays "on station" in the control room.

Comment #3 from the Yakama Nation

YN suggest additional text to clarify how both methods/types of equipment calculate leak rates through the primary liner.

Response: The leachate rate is calculated using the totalizer as follows:

Leachate rate = (Current totalizer reading – previous totalizer reading) / acreage of basin wetted surface area / number of days between readings.

The leachate rate is calculated using the pump timer as follows:

Leachate rate = (Current pump run time – previous pump run time) x pump flow rate / acreage of basin wetted surface area / number of days between readings.

Comment #4 from A Stakeholder

I am a long-time resident of our city (Richland, WA) and I am writing to express my support for the changes to Hanford Permit for Operations at a Treatment, Storage, and Disposal Unit. I understand these changes are being made to allow personnel to focus on other activities at the unit when ETF is not transferring or processing waste. I also support the temporary authorization (TA) request to allow for the changes in control room alarm monitoring to be put into effect before the permit modification approval is complete.

Response: Thank you.

Comment #5 from A Stakeholder

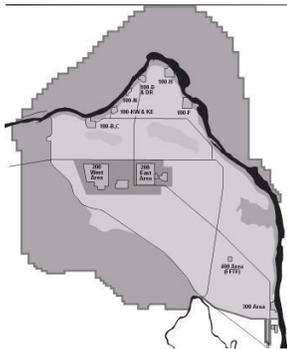
Also, I would like to go on record about Heart of America Northwest. First, I would like to make it clear that I am not a member of Heart of America Northwest. They call themselves the people’s voice for Hanford cleanup. I am a people (person) and they are not my voice. I have my own voice. I would like to know how many of their members live in the “greater Tri-Cities” (the so-called Quad cities plus the outliers like Burbank, Benton City, etc.). I doubt it’s many, so I would like Heart of America to start calling themselves “some people’s voice for Hanford cleanup” or “a part of Seattle’s voice for Hanford cleanup” or something like that. Please send a copy of this comment and your response to Heart of American [sic] Northwest, so that they know where I stand on them saying they are the people’s voice.

Response: We recommend you contact Heart of America Northwest directly about how it describes itself. Heart of America Northwest is on Hanford’s email and postal lists, and will get notified of the availability of this Response to Comment.

APPENDIX A: COPIES OF ALL PUBLIC NOTICES

Public notices for this comment period:

1. Public notice (fact sheet).
2. Advertisement in the *Tri-City Herald*.
3. Advance notice sent to the Hanford-Info email list.
4. Notice sent to the Hanford-Info email list.



Public Comment Period on changes to Hanford Permit for Operations at a Treatment, Storage, and Disposal Unit

The U.S. Department of Energy Richland Operations Office (DOE-RL) is holding a 60-day public comment period on proposed modifications to the Hanford Facility Dangerous Waste Permit. These Class 2 modifications involve changes to control room monitoring and liner performance monitoring equipment for the Liquid Effluent Retention Facility (LERF)/ 200 Area Effluent Treatment Facility (ETF). These modifications also include changes to several permit attachments and are necessary to respond to recent operational changes at the LERF/ETF due to decreased volumes in waste being processed at the ETF.

January 2014

U.S. Department of Energy

Background

These proposed Class 2 modifications are for the LERF/ETF Treatment, Storage, and Disposal unit in Part III (*Unit Specific Conditions for Final Status Operations*) of Hanford's Dangerous Waste Permit.

These proposed changes revise three parts of the LERF/ETF chapter of the Hanford Permit by changing the frequency at which specified alarms, leak detectors, and level/pressure indicators are monitored. Also proposed is a different method to monitor leachate (leakage through the primary LERF basin liner into a collection system).

The proposed changes affect the sections of the following addenda of the LERF/ETF permit chapter:

- Addendum C, Process Information
- Addendum F, Preparedness and Prevention
- Addendum I, Inspection Requirements

A temporary authorization (TA) request is included in this permit modification request to allow for the changes in control room alarm monitoring to be put into effect before the permit modification approval is complete. The resulting action on the modification request (approval, denial, or approval with changes) will supersede any TA approval.



Liquid Effluent Retention Facility and 200 Area Effluent Treatment Facility

What are Class 2 Permit Modifications? Updates or changes to the Hanford Facility Dangerous Waste Permit, which may be in response to new regulations, technological advancements, or variations in waste types or quantities. All Class 2 changes require approval from the Washington Department of Ecology.



Public Comment

DOE-RL wants your feedback on these proposed modifications. The public comment period will run from **January 20 through March 21, 2014**. A public meeting will be held February 11 at the Richland Public Library from 5:30-6:30 pm.

About LERF/ETF

The LERF/ETF unit is a wastewater storage and treatment system in the 200 East Area (in the center of the Hanford Site). The system receives process wastewater from the 242-A Evaporator, 200 West Area groundwater, and other Hanford remediation and waste management activities. The LERF consists of lined surface basins. Wastewater from LERF is pumped to ETF for treatment to remove contaminants.

In previous years, ETF treated wastewater on a continual basis, with only short operational breaks for maintenance or equipment repair. The operation of the 200 West Pump-and-Treat system in recent years has reduced substantially the volume of liquids sent to LERF/ETF. Therefore, for efficiency ETF will start to process wastewater on a campaign basis instead of continuously.

Summary of Proposed Changes

This modification request proposes to revise three addenda of the LERF/ETF Hanford Facility RCRA Permit by changing the frequency at which specified alarms, leak detectors, and level/pressure indicators are monitored. In addition, modifications are proposed that allow for an additional monitoring method to be used to calculate the leakage through the primary liner of the LERF basins.

The proposed changes to the monitoring of specified alarms and indicators are to reduce the continuous, 24-hour a day monitoring to daily **only** when ETF is in standby mode, and no waste processing or waste transfers are occurring. During waste processing and/or aqueous waste transfers, including any liquid transfers to or from LERF, the monitoring will remain the same as the current permit requirements (24-hour continuous monitoring). These changes will allow personnel to focus on other activities at the unit when ETF is not transferring or processing waste.

The proposed changes to the leachate monitoring method will allow a second method to be used to calculate the action leakage rate of the liners. The action leakage rate monitors the liner performance. Due to the historically low leachate levels, the current leak detection equipment has not worked well. Therefore, a second method to calculate the leakage rate is proposed in this permit modification.

Temporary Authorization (TA) Request

The Permittees are requesting a TA to prevent disruption of ongoing waste management activities. The TA is specific to the reduction in the monitoring of the specified alarms and indicators as noted above and does not include changes to the leachate monitoring method. If approved, the TA will allow operators to monitor daily rather than continuously when there is no waste processing or transfers. This would make personnel available to focus on more critical environmental and operational work during the facility downtime planned for February thru April 2014.

The DOE-RL contact person for this permit change is Kim Ballinger, (509) 376-6332. The Washington State Department of Ecology contact person is Rick Bond, (509) 372-7950.

The permittees' compliance history during the life of the permit being modified is available from the Washington State Department of Ecology contact person.

Copies of the proposed permit modification and supporting documentation are available at the Administrative Record, 2440 Stevens Drive, Richland, WA and at the information repositories listed below.

How you can become involved

A 60-day public comment period on *proposed Class 2 modifications to Part III of Hanford's Dangerous Waste Permit* will run from **January 20 through March 21, 2014**. A public meeting will be held February 11 at the Richland Public Library from 5:30-6:30 pm. **Please submit comments by March 21, 2014 to:**



Rick Bond
 Washington State Department of Ecology
 3100 Port of Benton Boulevard
 Richland, WA 99354
 Email: Hanford@ecy.wa.gov



Hanford Public Information Repositories and review locations

<p>Portland State University Government Information Branford Price Millar Library 1875 SW Park Avenue Portland, OR 97207-1151 Attn: Claudia Weston (503) 725-4542 Map:http://www.pdx.edu/map.html</p>	<p>University of Washington Suzzallo Library Government Publications Dept. Box 352900 Seattle, WA 98195-2900 Attn: Hilary Reinert (206) 543-5597 Map: http://tinyurl.com/m8ebj</p>	<p>US. Department of Energy Public Reading Room Washington State University, Tri Cities Consolidated Information Ctr., Rm. 101-L 2770 Crimson Way Richland, WA 99352 Attn: Janice Parthree (509) 372-7443 Map:http://www.tricity.wsu.edu/campusmaps/campusmap.pdf</p>	<p>Gonzaga University Foley Center Library East 502 Boone Avenue Spokane, WA Attn: John Spencer (509) 313-6110 Map:http://tinyurl.com/2c6bpm</p>	<p>Ecology Nuclear Waste Program Resource Center 3100 Port of Benton Blvd. Richland, WA 93354 Attn: Valarie Peery 509-372-7950 Online: www.ecy.wa.gov/program/nwp/commentperiods.htm</p>
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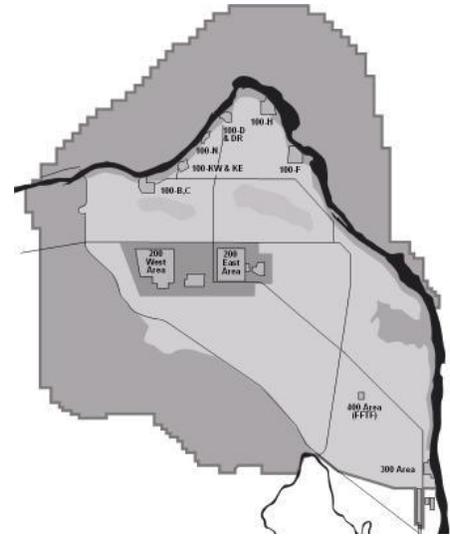
Administrative Record and Public Information Repository:

Address: 2440 Stevens Center Place, Room 1101, Richland, WA.

Phone: 509-376-2530 **Web site address:** <http://pdw.hanford.gov/arpir/>

Hanford Public Involvement Opportunity

We want to hear from you on the proposed permit modifications for the Hanford Site!



Class 2 Permit Modification Fact Sheet
U.S. Department of Energy
Richland Operations Office
P.O. Box 550, A7-75
Richland, WA 99352

Public Comment Period on changes to Hanford Permit for Operations at a Treatment, Storage, and Disposal Unit



The U.S. Department of Energy Richland Operations Office (DOE-RL) is holding a 60-day public comment period on proposed modifications to the Hanford Facility Dangerous Waste Permit. These Class 2 modifications involve changes to control room monitoring and liner performance monitoring equipment for the Liquid Effluent Retention Facility (LERF)/200 Area Effluent Treatment Facility (ETF). These modifications also include changes to several permit attachments and are necessary to respond to recent operational changes at the LERF/ETF due to decreased volumes in waste being processed at the ETF.

The public comment period will run from January 20, 2014 through March 21, 2014.

DOE-RL and the Washington Department of Ecology want your input to these proposed modifications! Submit comments by March 21, 2014, in writing, by mail, or electronically to:

Rick Bond
Washington State Department of Ecology
3100 Port of Benton Blvd
Richland, WA 99354
Email: Hanford@ecy.wa.gov

The DOE-RL contact person for this permit change is Kim Ballinger, (509) 376-6332. The Washington State Department of Ecology contact person is Rick Bond, (509) 372-7950.

Copies of the proposed permit modification and supporting documentation are available at the Administrative Record, 2440 Stevens Drive, Richland, WA.

The permittees' compliance history during the life of the permit being modified is available from the Washington State Department of Ecology contact person.

You are invited to attend a meeting to discuss the proposed permit modification and provide written comments. The meeting is scheduled for:

When: February 11, 2014, 5:30-6:30pm
Where: Richland Public Library
955 Northgate Dr.
Richland, WA 99352

Please e-mail us at CLASSPRMTM@rl.gov if you require special accommodations to participate in the meetings.

From: [^TPA](#)
To: HANFORD-INFO@LISTSERV.WA.GOV
Subject: Department of Energy announces upcoming public comment opportunity
Date: Friday, December 20, 2013 11:13:10 AM

Upcoming Public Comment Period on proposed Permit Modifications for the Liquid Effluent Retention Facility and 200 Area Effluent Treatment Facility

The U.S. Department of Energy plans to hold a 60-day public comment period on proposed modifications to the Hanford Facility Dangerous Waste Permit. These Class 2 modifications involve changes to control room alarm monitoring and liner performance monitoring equipment updates for the Liquid Effluent Retention Facility (LERF) and 200 Area Effluent Treatment Facility (ETF). LERF/ETF, an operating Treatment, Storage, and Disposal unit (TSD unit), is a waste water storage and treatment system located in the 200 East Area (in the center of the Hanford site). These updates include changes to several permit attachments, and are necessary to respond to recent operational changes at the LERF-ETF due to decreased volumes in waste being processed at the ETF.

Class 2 modifications apply to periodic updates to the permit, such as response to new regulations, technological advancements, and variations in waste types/quantities. All Class 2 Hanford permit changes require Ecology approval. This Class 2 modification is different than a separate Class 2 permit modification that will begin in early January related to Groundwater Monitoring at the LERF-ETF.

The comment period for these modifications is expected to begin in late January.

From: ^TPA [mailto:TPA@RL.GOV]

Sent: Monday, January 20, 2014 3:47 PM

To: HANFORD-INFO@LISTSERV.WA.GOV

Subject: FW: Public Comment Opportunity: Department of Energy Proposing Changes to Hanford Permit for Operations at a Treatment, Storage, and Disposal Unit

This is a message from the U.S. Department of Energy – Richland Operations Office

The U.S. Department of Energy Richland Operations Office (DOE-RL) is holding a 60-day public comment period from January 20 through March 21, 2014, on proposed modifications to the Hanford Facility Dangerous Waste Permit. These Class 2 modifications involve changes to control room monitoring and liner performance monitoring equipment for the Liquid Effluent Retention Facility (LERF)/200 Area Effluent Treatment Facility (ETF). These modifications also include changes to several permit attachments and are necessary to respond to recent operational changes at the LERF/ETF due to decreased volumes in waste being processed at the ETF.

The proposed Class 2 modifications to LERF/ETF are:

- Changing the frequency at which specified alarms, leak detectors, and level/pressure indicators are monitored.
- A different method to monitor leachate (leakage through the primary LERF basin liner into a collection system).
- A temporary authorization (TA) request is included in this permit modification request to allow for the changes in control room alarm monitoring to be put into effect before the permit modification approval is complete. The resulting action on the modification request (approval, denial, or approval with changes) will supersede any TA approval.

The DOE-RL contact for this permit change is Kim Ballinger, (509) 376-6332. The Washington State Department of Ecology contact is Rick Bond, (509) 372-7950.

The permittees' compliance history during the life of the permit being modified is available from the Ecology contact.

The Administrative Record for the Class 2 modification can be found at the following link: <http://pdw.hanford.gov/arpir/index.cfm/viewDoc?accession=0086779>. A copy of a fact sheet on these modifications is attached.

How can the public provide input?

A public meeting will be held **February 11, 2014, from 5:30-6:30 pm**, at the Richland Public Library, 955 Northgate Dr. Richland, WA 99352.

Comments should be submitted by March 21, 2014, to:

Rick Bond
Washington State Department of Ecology
3100 Port of Benton Boulevard
Richland, WA 99354
Email: Hanford@ecy.wa.gov

APPENDIX B: COPIES OF ALL WRITTEN COMMENTS



Confederated Tribes and Bands
of the Yakama Nation ERWM

Established by the
Treaty of June 9, 1855

February 26, 2014

Central Files _____
File Name: _____
Cross Reference: _____

RECEIVED

MAR 03 2014

DEPARTMENT OF ECOLOGY
NWP - RICHLAND

Andrea L. Prignano
Washington State Department of Ecology
Port of Benton Blvd.
Richland, WA 99354

Subject: Review of the Proposed Class 2 Resource Conservation and Recovery Act (RCRA) Permit modifications to Permit Conditions (including I.F), Permit Attachments 8 & 10, and Groundwater Monitoring at the Hanford Facility Liquid Effluent Retention Facility and 200 Area Effluent Treatment Facility (LERF-ETF) and Addendums C, F, I for LERF/ETF, and temporary authorization request.

Dear Ms. Prignano:

The Confederated Tribes and Bands of the Yakama Nation appreciate the opportunity to review and provide comments on these documents.

The Confederated Tribes and Bands of the Yakama Nation is a federally recognized sovereign pursuant of the Treaty of June 9, 1855 made with the United States of America (12 Stat. 951). The U.S. Department of Energy Hanford site was developed on land ceded by the Yakama Nation under the 1855 Treaty with the United States. The Yakama Nation retains reserved rights to this land under the Treaty.

As these modifications are running concurrently, we have included our responses to both Class II mod requests within this response. We apologize for any confusion, but please note, Attachment #2 has both text edits and comments embedded within the document as there were no line identifiers.

We look forward to discussing our concerns regarding these proposed modifications to the Hanford RCRA permit with you.

Sincerely,

Russell Jim
Yakama Nation ERWM Program Manager

cc:

Jane Hedges, Washington Department of Ecology
Matt McCormick, U.S. Department of Energy
Ken Niles, Oregon Department of Energy
Stuart Harris, CTUIR
Gabe Bohnee, Nez Perce

Marlene George, YN ERWM
Administrative Record
Attachments:

Attachment # 1: YN ERWM program comments on Proposed Class 2 Resource Conservation and Recovery Act (RCRA) Permit modifications to Permit Conditions, Permit Attachments 8 & 10, and Groundwater Monitoring at the Hanford Facility Liquid Effluent Retention Facility and 200 Area Effluent Treatment Facility (LERF-ETF):

General Comment:

- YN ERWM finds some edits acceptable; however, we are concerned over the appropriateness of any modifications to the II.F. Condition outside of the permit renewal process. The proposed modification will affect all RCRA units, not solely ETF/LERF. As there are multiple underlying issues which will not be resolved, edits to this condition are unwarranted at this time. **YN requests Ecology deny proposed modifications to II.F.**

Below are our specific concerns/comments.

Request 1):

Bullet 1 (II.F.1): As stated, the general facility conditions (e.g., II.F), where appropriate, address dangerous waste management activities which may not be directly associated with distinct TSD units, or which may be associated with many TSD units (including corrective actions at solid waste management units and areas of concern). Deletion of Permit Condition II.F.1 undermines the authority of Ecology to enforce groundwater protection and monitoring in accordance with WAC 173-303-610 and WAC 173-303-645 requirements. Furthermore, reference to proposed changes within a unit-specific chapter does not suffice, meet compliance requirements, or support elimination of WAC 173-303 groundwater requirements for the RCRA permit.

YN ERWM program opposes deletion of Permit Condition II.F.1 and its replacement to be 'marked as reserved.' YN requests the condition be retained with update reference to purgewater management as in accordance with the Hanford Site Strategy for Management of Investigation Derives Waste (DOE/RL-2011-41, Revision 0).

Bullet 2 (II.F.2):

- Hanford Facility wells will continue to require *remediation/abandonment* needs. This text of II. F.2 should be retained.
- Deletion of II.F.2.a is supported.
- Modifications to II.F.2.b are supported in part. YN ERMW program supports the additional clarification text to require well inspections and maintenances. WAC 173-160-381 states *Any well which is unusable, abandoned, or whose use has been permanently discontinued, or which is in such disrepair that its continued use is impractical or is an environmental, safety or public health hazard shall be decommissioned.* It is clear that a well must first be deemed abandoned, etc. YN requests the term abandoned be retained.

Additionally, YN request Ecology clarify within Permit Condition II.F.2.b that DOE will be required to demonstrate whether a well has potential use as a RCRA monitoring well prior to abandonment/decommissioning. YN requests that Condition II.F.2.b be applied to Part IV units of the RCRA Permit for consistency across the Hanford site groundwater monitoring programs and in compliance with WAC 173-303-645/646 requirements.

- YN does not support Modification s to II.F.2.c as it undermines Ecology's authority to require a determination of the need for abandonment and lessens Ecology's knowledge regarding the well activities/issues.

- YN requests the definition of *rehabilitate unusable wells*. The term rehabilitate/rehabilitation is not defined in WAC 173-160 and as such should not be used to define actions for Hanford site wells.
- YN program does not fully support II.F.2.d modifications. Inclusions of citations for WAC 173-160 and Chapter 18.104 RCW are supported. Deletion of completion of the process by 2012 is acceptable as this year has passed. The rest of the proposed modification is not acceptable. This modification lessens Ecology's authority to enforce WAC 173-303-645/646 requirements through Permit conditions/Closure Plans/Contingency Plans. Replacing non-compliant wells requires changes to the groundwater monitoring plan would, in itself, require a permit modification. Necessarily, this would require analysis of the groundwater monitoring network and the identification of any needs changes to the number of wells, groundwater flow, etc. These wells would then need to be identified in the permit. To simply say the schedule is under the milestone does not suffice compliance requirements under RCRA. Furthermore, is the proposed modification is structured such that the schedule is outside of the RCRA Permit and WAC 173-303-830 process (and outside of the public involvement process).

Attachment #2: YN comments and suggested edits to the proposed Hanford Well Maintenance and Inspection Plan HNF-56398, Revision 0.

**Hanford Well Maintenance and Inspection Plan
HNF-56398, Revision 0
Previously BHI- 01265, Revision 0**

- YN ERWM notes this plan lacks details and requests changes listed in comments below. The document does not have line numbers. Comments are attached to paragraphs to help identify concerns and requests. Pages breaks were eliminated. YN comments, text changes, etc are highlighted.

Contents

1.0 INTROUCTION..... 3

2.0 REQUIREMENTS..... 3

3.0 SCHEDULE..... 3

4.0 WELL
INSPECTIONS..... 4

5.0 WELL MAINTENANCE.....4

6.0
MANAGEMENT CONTROL

- YN : Edited to add and reflect 6.0: Management Control

REFERENCES..... 5

7.0
REFERENCES

8.0
BIBLIOGRAPHY..... 5

1.0 Introduction

This document presents the well maintenance and inspection plan for use in supporting groundwater activities at the Hanford Site. Wells located across the Hanford Site are used by Site contractors for a variety of groundwater programs. As such, these wells require various types of inspections and/or maintenance during their lifecycles. The wells that must be maintained are defined in Section 2.0, “Requirements.”

- This document’s title indicates it covers only well maintenance and an inspection yet decommissioning (i.e. abandonment) is discussed. YN suggest you retain ‘abandonment’ in title as well as decommissioning.
- YN ERWM requests edits to text to include the requirements of 173-160-101/400/406/410/420/430/440/442/450/451/456/457/458/460.

2.0 Requirements

Washington Administrative Code (WAC) 173-160, “Minimum Standards for Construction and Maintenance of Wells,” states “It is the responsibility of the resource protection well operator, resource protection well contractor and the property owner to take whatever measures are necessary to guard against waste and contamination of the groundwater resource.” The provisions

of the dangerous waste section of the *Resource Conservation and Recovery Act of 1976 Permit for the Treatment, Storage, and Disposal of Dangerous Waste at the Hanford Site* Permit are controlled by the “State of Washington Hazardous Waste Management Act of 1976” (RCW 70.105). Part II.F.2.a of Ecology 1994 states that “...the Permittees shall inspect the integrity of active resource protection wells as defined by WAC 173-160-030 subject to this Permit at least once every five (5) years.”

Wells subject to the RCRA Permit requirements are defined as wells actively monitoring treatment, storage, and disposal (TSD) unit closures (in Part V of the Permit); TSD operating units (in Part III of the Permit); and TSD units undergoing postclosure/modified closure (Part VI of the Permit).

- YN: Part IV wells should be subject to WAC 173-160 regulations and identified in II.F conditions of the Permit. YN requests text edits to include also **Part IV** wells as subject to these requirements.
- Additional comment: Delete term “postclosure/modified closure”. Modified closure is not authorized under RCRA. Replace with “postclosure”.
- YN requests the following deleted text from the current Attachment 8 be included as it supports a comprehensive and consistent Hanford site groundwater monitoring program: “Additionally, the "Second Responsiveness Summary" section (Ecology 1994), which discusses interpretation of the RCRA Permit (found in Part II.F.2.a, page 99), states that Ecology requires maintenance inspections because of the likelihood that monitoring wells can act as preferential pathways for the migration of contaminants. Although the inspections are only required for the wells subject to the Permit, Ecology further states that" ... the Department will pursue enforcement action outside of this Permit to assess and remediate and/or abandon, where applicable, those wells not being addressed by this Permit. " Groundwater monitoring wells included in the maintenance/inspection plan are determined by the RCRA permit and various programs such as the Hanford Site Groundwater Vadose Zone Integration Project. Maintenance of wells supporting other programs or projects across the Hanford Site may be included in the maintenance schedule at the request of the program manager."

3.0 Schedule _____

The list of RCRA wells to be considered for maintenance or inspection will be based on a review of information on the current wells. This review shall include field sampling notations and history, previous inspection results, or other data collected during sampling of the wells. In addition, the installation date and/or location of a well will also be considered as well as the elapsed time since last routine maintenance

Well inspections, consistent with the requirements in permit condition II.F.2.a, will occur in 2015, and continue every 5 years after that. The schedule will accommodate changes that will occur with the addition of new wells, adjustments in the TSD unit closures, and wells that are no longer needed for monitoring. The schedule will also accommodate wells used by other programs.

- YN requests text edits to state the schedule shall be developed on a **yearly** schedule approved by Ecology and any changes to the inspection schedule shall require a Permit modification in accordance with the WAC 173-303-830/840 process.

YN suggests the schedule be performed on a 3-5 year schedule or as needed to repair problems identified during sampling. Additionally, YN suggests if a ground water monitoring well becomes unsuitable for use, the status be documented and reported to Ecology within fifteen (15) days of identifying the well as unsuitable for use. In addition, the “unsuitable-for-use” well should be evaluated within thirty (30) days of the designation to determine if a new well should be constructed. A copy of the evaluation should be provided to Ecology. If applicable, the “unsuitable-for-use” well shall be placed on a well decommissioning list for Ecology’s approval. YN suggests this text be incorporated into this document and reflected in the I.F conditions.

- YN ERWM requests edits to text to include the specific requirements of 173-160-460 for the decommissioning process for resource protection wells. YN requests that the Permittees must obtain Ecology’s written approval to remediate or decommission the well and this text stated within this document.

4.0 Well Inspections

Well inspections are conducted as an integral part of field maintenance activities. Inspections include visual examination of the well site, surface components of the well structure (e.g., barrier posts, concrete surface pad and seal, protective well casing, well cap), identification of equipment installed in the well, and where possible measurements of the depths to water and/or bottom of the well. Inspections are documented on field reports.

- YN requests these reports also be placed in the Administrative File for the specific Unit.
- As Inspections are discussed and remain the basis of maintenance, and there does not appear to be an Inspection Plan for Groundwater Resource Wells in place for any Permitted Units, YN requests details for inspections are included similar to those for performing maintenance/restoration. YN requests the following be included within this document as inspection requirements:
 - Security control devices: well caps, and locks
 - Surface inspections (as necessary to identify and correct the effects of settling, subsidence, erosion or other events.
 - Location, integrity, and inspections of benchmarks, if appropriate
 - Location, integrity, and inspection of groundwater wells (to include inspection of the cap and casing of each well to ensure that it is locked, pulling and inspecting the pump, brushing the inner walls of the casing and screen, and conducting a down-hole television survey
 - Vegetative cover condition
 - Procedures regarding emergency and monitoring equipment (to include procedures for using, inspecting, repairing, and replacing emergency and monitoring equipment

5.0 Well Maintenance

- YN requested text edits in yellow:

Based on review of the 3-5 year inspection results, or other evaluations such as field sampling notations, well sampling issues, etc., well maintenance for groundwater monitoring wells will be performed as needed. Well maintenance will include the following tasks, as necessary, to restore the well to its intended use:

1. Removing groundwater sampling pump system and/or aquifer testing instrumentation/equipment.
2. Inspecting and repairing (or replacing, as necessary) the sampling pump system and/or aquifer testing instrumentation/equipment
3. Cleaning the well casing perforations

- YN requests clarification: What actions are to be done to ensure all wells are constructed to meet RCRA requirements?
- 4. Inspecting and cleaning well screen or repair of well screen (if possible)
- 5. Removing debris and fill material.
- YN requests adding: *and accumulated sediment*
- 6. Performing borehole video camera surveillance
- 7. Re-installing sampling and/or aquifer testing instrumentation/equipment
- 8. Redeveloping the well after performing maintenance
- 9. Inspecting final conditions after well maintenance (e.g. cap is replaced, concrete surface pad integrity, lock is secure, etc.)
- 10. Documenting well conditions and maintenance activities
- YN request text be included which deals with actions taken to deepen “dry” wells. YN suggests the Permittee be required to submit a well deepening plan for Ecology approval that satisfies the groundwater protection standards of Chapter 173-160 WAC, and that the well deepening plan shall not be implemented until after the Permittee receives Ecology’s approval of the plan.

6.0 Management Control

- YN requested deleted text from current Attachment 8 be included to ensure QA/QC plans, etc are in place.

Well maintenance activities will be performed by subcontract using approved subcontractor procedures, quality assurance and quality control plans, health and safety plan, and other appropriate and/or required documentation. The following will control environmental compliance, quality assurance, and reporting:

- BHI-EE-02, *Environmental Requirements*, establishes the overall environmental compliance requirements for BHI. YN recognizes that this citation is no longer the appropriate document and requests the appropriate document be cited.
- Program implementation and procedural compliance will be monitored periodically through surveillance and self-assessments.
- Well maintenance activities will be documented and transmitted for entry into the Hanford Well Information System Database. Inspections are to be recorded in the RCRA operating records, where necessary. All documentation shall be submitted to Document and Information Services.

7.0 References

WA7890008967, 2007, *Hanford Facility Resource Conservation and Recovery Act Permit, Dangerous Waste Portion, Revision 8C, for the Treatment, Storage, and Disposal of Dangerous Waste*, as amended,
Washington State Department of Ecology, Richland, *Washington Resource Conservation and Recovery Act of 1976*, 42 U.S.C. 6901, et seq.
RCW 18.104, “Well Construction,” *Revised Code of Washington*, as amended.
RCW 70.105, “State of Washington Hazardous Waste Management Act of 1976,” *Revised Code of Washington*, as amended.
WAC 173-160, “Minimum Standards for Construction and Maintenance of Wells,” *Washington Administrative Code*, as amended.
WAC 173-162, “Regulation and Licensing of Well Contractors and Operators,” *Washington Administrative Code*, as amended.
WAC 173-303-645, “Releases from regulated units,” *Washington Administrative Code*, as amended.

8.0 BIBLIOGRAPHY

DOE-RL, 1994, *Hanford Site Groundwater Management Program*, DOE/RL-89-12, as amended, U.S. Department of Energy, Richland Operations Office, Richland, Washington.

Attachment #3: YN ERWM Program questions regarding text changes in Addendum C page C-36 (see Addendum C text below):

- It is unclear how fluid levels in each leachate sump can be manually maintained if the system is currently designed to operate under automated controls. YN request clarification.
- It's the YN ERWM program's understanding is that currently other instrumentation provided is real-time continuous level monitoring and this information is sent to the 242-A Evaporator control room. YN understood this information would continue to be recorded and monitored daily rather than continuously. YN requests clarification and editing to ensure such real-time data continues to be provided and recorded in the Control Room.
- YN suggest additional text to clarify how both methods/types of equipment calculate leak rates through the primary liner.

9 | ~~Automated controls maintain~~ The fluid level in each leachate sump is maintained below 33 centimeters
10 | to prevent significant liquid backup into the drainage layer. The leachate pump is activated when the
11 | liquid level in the sump reaches about 28 centimeters, and is shut off when the sump liquid level reaches
12 | about 18 centimeters. This operation may be done either manually or automatically, prevents the leachate
13 | ~~pump from cycling with no fluid, which could damage the pump.~~ Liquid level control is accomplished
14 | with conductivity probes that trigger relays selected specifically for application to submersible pumps and
15 | leachate fluids. A flow meter/totalizer on the leachate return pipe measures fluid volumes pumped and
16 | pumping rate from the leachate collection sumps, and indicates volume and flow rate on local readouts. In
17 | addition, a timer on the leachate pump tracks the cumulative pump operating hours. Other
18 | instrumentation provided is real-time continuous level monitoring with readout at the catch basin ~~and the~~
19 | ~~242-A Evaporator control room.~~ Leachate levels are monitored at least weekly. A sampling port is
20 | provided in the leachate piping system at the catch basin. ~~Leak detection is provided through inspections~~
21 | ~~of~~ The leak rate through the primary liner is calculated using the leachate flow meter/totalizer readings or
22 | pump operating hours readings along with the pump flow rate. Calculations using either method are
23 | sufficient for compliance. For more information on inspections, refer to Addendum I.

- . See Attachment #3.

Attachment 1:

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Review & Recycle**

January 20, 2014

✓ Rick Bond
[Title]
Washington State Department of Ecology
3100 Port of Benton Blvd
Richland, WA 99354

RECEIVED

JAN 24 2014

Department of Ecology
NWP-Richland

SUBJECT: Public Comment Period on changes to Hanford Permit for Operations at a Treatment, Storage, and Disposal Unit

Dear Rick Bond:

I am a long-time resident of our city (Richland, WA) and I am writing to express my support for the changes to Hanford Permit for Operations at a Treatment, Storage, and Disposal Unit. I understand these changes are being made to allow personnel to focus on other activities at the unit when ETF is not transferring or processing waste. I also support the temporary authorization (TA) request to allow for the changes in control room alarm monitoring to be put into effect before the permit modification approval is complete.

Also, I would like to go on record about Heart of American Northwest. First, I would like to make it clear that I am not a member of Heart of America Northwest. They call themselves the people's voice for Hanford cleanup. I am a people [person] and they are not my voice. I have my own voice. I would like to know how many of their members live in the "greater Tri-Cities" [the so-called Quad cities plus the outliers like Burbank, Benton City, etc.]. I doubt it's many, so I would like Heart of America Northwest to start calling themselves "some people's voice for Hanford cleanup" or "a part of Seattle's voice for Hanford cleanup" or something like that. Please send a copy of this comment and your response to Heart of American Northwest, so that they know where I stand on them saying they are the people's voice.

Sincerely,

A Stakeholder

APPENDIX C: ECOLOGY LETTER DOCUMENTING FINAL PERMIT DECISION



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

3100 Port of Benton Blvd • Richland, WA 99354 • (509) 372-7950
711 for Washington Relay Service • Persons with a speech disability can call 877-833-6341

April 8, 2014

14-NWP-052

Mr. Matthew S. McCormick, Manager
Richland Operations Office
United States Department of Energy
PO Box 550, MSIN: A7-50
Richland, Washington 99352

Mr. John Fulton, President and CEO
CH2M Hill Plateau Remediation Company
PO Box 1600, MSIN: H7-30
Richland, Washington 99352

Re: Approval, with Changes, for the Proposed Class 2 Modification to *the Hanford Facility Resource Conservation and Recovery Act Permit, Dangerous Waste Portion, Revision 8C, for the Treatment, Storage, and Disposal of Dangerous Waste* (Hanford Facility RCRA Permit), Operating Unit Group 3, Liquid Effluent Retention Facility and 200 Area Effluent Treatment Facility (LERF/ETF)

Reference: See page 2

Dear Mr. McCormick and Mr. Fulton:

The Department of Ecology (Ecology) is approving, with changes (see enclosure), your request for a Class 2 Modification to the LERF/ETF Unit Group (Reference) in accordance with Washington Administrative Code (WAC) 173-303-830(4)(b)(vi)(A)(I). You submitted modifications to Addenda C, F, and I. The changes were made to Addendum C only. This permit modification approval applies to the Hanford Facility RCRA Permit, Revision 8C. It does not modify the draft Revision 9 permit.

Comments were received during the public comment period for the permit modification. The Response to Comments document is enclosed and is available at the Ecology Nuclear Waste Program Office. No additional changes to the LERF/ETF modification resulted from the responses to the public comments. The changes to the modification were the result of internal Ecology discussion and comments.

Ecology requires the United States Department of Energy–Richland Operations Office and CHPRC to address the required changes and provide Ecology with two clean copies of Addenda C, F, and I, with changes incorporated, by letter, within thirty (30) days. These copies will be used to update the hard copy Hanford Facility Dangerous Waste Permit. We also request an electronic copy of the same addenda be submitted within thirty (30) days to Andrea Prignano, Site-Wide Dangerous Waste Permit Coordinator.



Mr. Matthew S. McCormick
Mr. John Fulton
April 8, 2014

14-NWP-052

Concurrent with this Class 2 modification, changes were approved to Addendum I through a Class 1 Modification. These approved Class 1 modifications do not appear in the attached Class 2 Modification text but are still in effect. This Class 2 Modification approval (with changes) does not negate the Class 1 modification approvals.

If there are any questions, please contact Stacy Nichols, LERF/ETF Permit Lead, at stacy.nichols@ecy.wa.gov or (509) 372-7917, or Andrea Prignano, Site-Wide Dangerous Waste Permit Coordinator, at Andrea.Prignano@ecy.wa.gov or (509) 372-7911.

Sincerely,



Suzanne Dahl
Tank Waste Treatment Section Manager
Nuclear Waste Program

Enclosures (2)

Reference: Letter 14-AMRP-0075, dated January 14, 2014, from Matthew McCormick, to J.A. Hedges, Ecology, Program Manager

cc electronic w/enc:

Dave Bartus EPA
Dennis Faulk, EPA
Michael Collins, USDOE
Jennie Seaver, CHPRC
Rick Engelmann, CHPRC
Ken Niles, ODOE
Ron Skinnerland, Ecology
Andrea Prignano, Ecology
Rick Bond, Ecology
Stacy Nichols, Ecology
USDOE-RL Correspondence Control

cc w/enc:

Steve Hudson, HAB
Administrative Record:
LERF/ETF, TSD: S-2-8
Environmental Portal
CHPRC Correspondence Control

cc w/o enc:

Stuart Harris, CTUIR
Gabriel Bohnee, NPT
Russell Jim, YN