



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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March 11, 2016

16-NWP-048

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Mr. Mark A. Lindholm, President  
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Re: Proposed Class 3 Permit Modification 8C.2016.2D to the *Hanford Facility Resource Conservation and Recovery Act Permit, Dangerous Waste Portion, Revision 8C, for the Treatment, Storage, and Disposal of Dangerous Waste*, Part V, Closure Unit Group 6, Waste Encapsulation and Storage Facility Hot Cells A through F, WA7890008967

Reference: See page 3

Dear Ladies and Gentlemen:

This letter transmits the proposed Permit Modification 8C.2016.2D to Part V, Closure Unit Group 6, Waste Encapsulation and Storage Facility (WESF) Hot Cells A through F, of the *Hanford Facility Resource Conservation and Recovery Act Permit, Dangerous Waste Portion, Revision 8C, for the Treatment, Storage, and Disposal of Dangerous Waste*.

The permittees are the United States Department of Energy (USDOE) as owner/operator and CH2M HILL Plateau Remediation Company as co-operator.



This proposed Class 3 Permit Modification would initiate closure of Hot Cells A through F at WESF. This proposal includes permit conditions, Part A, and a Closure Plan for WESF Hot Cells A through F.

Washington Administrative Code (WAC) 173-303-840(3)(d) requires at least a 45-day public comment period for the draft permit modification. The Department of Ecology (Ecology) will hold this public comment period from March 14, 2016, through April 27, 2016. A public hearing is not scheduled, but Ecology will consider holding one if there is enough interest.

The proposed permit modification is on the enclosed DVD and also available on the Ecology website at <http://www.ecy.wa.gov/programs/nwp/commentperiods.htm>. Copies of the DVD are also available at the Hanford Public Information Repositories in Richland, Spokane, and Seattle, Washington, as well as Portland, Oregon. Copies of the DVD are also available at:

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

United States Department of Energy  
Administrative Record  
2440 Stevens Center Place  
Richland, Washington 99354

This comment period initiates the second portion of a Class 3 Modification. The USDOE held a public comment period regarding the Class 3 Permit Modification request for the WESF Hot Cells A through F from December 11, 2014, through March 3, 2015. They held a public meeting on January 7, 2015, at the Richland Public Library in Richland, Washington.

As a result of public comments received and after performing a completeness review, Ecology requested the following information from the permittees and made the following modifications to the draft submittal:

Ecology requested both design and operating records from the permittees to be included in the Closure Plan and Part A to support clean closure of Hot Cells A through F. These clean closure activities include details on design of the stabilization of the Hot Cells and details on cutting up and removal of Hot Cells A through F. Ecology also revised the Part A and Closure Plan to clarify that Hot Cell G will only be used for storage of up to nine capsules in shielded containers. Ecology and the permittees revised the Part A and Closure Plan to ensure that the necessary sections of WAC 173-303-610 were adequately addressed.

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Ecology received 12 public comments from USDOE's comment period. Ecology also received five public comments specific to WESF Hot Cells A through F during the renewal of the Hanford Site-wide Permit, Rev. 9 public comment period. We reviewed all of these comments and wrote a *Response to Comments* document. Our *Response to Comments* is included on the enclosed DVD (Ecology Publication 16-05-006) and on the Ecology website at <http://www.ecy.wa.gov/programs/nwp/commentperiods.htm>.

As part of the Class 3 Permit Modification request, the permittees requested a Temporary Authorization (TA) to begin March 31, 2016. Ecology has not yet approved the TA, but will follow up with a formal approval letter if deemed appropriate.

If there are any questions regarding this permit modification, please contact Stephanie Schleif, WESF Project Manager, at [stephanie.schleif@ecy.wa.gov](mailto:stephanie.schleif@ecy.wa.gov) or (509) 372-7929, or Mandy Jones, WESF Permit Coordinator, at [mandy.jones@ecy.wa.gov](mailto:mandy.jones@ecy.wa.gov) or (509) 372-7916.

Sincerely,



Suzanne Dahl  
Dangerous Waste Permit Manager  
Nuclear Waste Program

mj/jt  
Enclosure

cc: See page 4

Reference: Letter 16-ESQ-0026, dated January 14, 2016, from S. Charboneau USDOE-RL, to J.A. Hedges, Ecology, "Revised Part A Form and Closure Plan for Waste Encapsulation Storage Facility (WESF) Closing Dangerous Waste Management Unit (DWMU) and Temporary Authorization to Implement Previously Requested Class 3 Modifications"

cc electronic w/o enc:

Dave Bartus, EPA	Dru Butler, MSA
Dennis Faulk, EPA	Jon Perry, MSA
Cliff Clark, USDOE	Ann Shattuck, MSA
Rob Hastings, USDOE	Michael Stephenson, PNNL
Lori Huffman, USDOE	Lucinda Borneman, WRPS
Tony McKarns, USDOE	Debra Alexander, Ecology
Brad Erlandson, BNI	Jennifer Cantu, Ecology
Roger Landon, BNI	Annette Carlson, Ecology
Sandi Murdock, BNI	Kelly Elsethagen, Ecology
Moussa Jaraysi, CHPRC	Mandy Jones, Ecology
	Ron Skinnerland, Ecology

cc w/enc, DVD:

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Cliff Clark, USDOE	CHPRC Correspondence Control
Lori Huffman, USDOE	Environmental Portal
Rod Skeen, CTUIR	Gonzaga University Foley Center Library
Gabriel Bohnee, NPT	Hanford Facility Operating Record
Russell Jim, YN	MSA Correspondence Control
Alyssa Buck, Wanapum	PNNL Correspondence Control
Steve Hudson, HAB	Portland State University Library,
Ken Niles, ODOE	Government Information
John Fowler, ACHP	University of Washington Suzzallo Library,
Robin Priddy, BCAA	Government Publications
Donald Redman, USACE	USDOE-ORP Correspondence Control
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Ted Maxwell, WSDA	Correspondence Control
Allyson Brooks, WSDAHP	WCH Correspondence Control
Shane Early, WSDNR	WRPS Correspondence Control

cc w/enc, DVD and hard copy:

Administrative Record: Hanford Site-wide Permit  
NWP Central File  
NWP Library

cc w/o enc:

NWP Reader File