



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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December 21, 2015

15-NWP-220

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Mr. Mark Lindholm, President  
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Re: Proposed Agency Initiated 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 II General Facility Conditions and Permit Attachment 9 – Permit Applicability Matrix, WA7890008967

Reference: See page 3

Dear Ladies and Gentlemen:

Enclosed is a DVD containing the proposed permit modification to Part II General Facility Conditions and Permit Attachment 9 – Permit Applicability Matrix of the *Hanford Facility Resource Conservation and Recovery Act Permit, Dangerous Waste Portion, Revision 8C, for the Treatment, Storage, and Disposal of Dangerous Waste* (Site-wide Permit).

Washington Administrative Code (WAC) 173-303-840(3)(d) allows at least 45-days for public comment of the proposed permit modification. The public comment period begins December 28, 2015, and ends February 13, 2016. Only those portions of the Site-wide Permit subject to this modification are reopened. All other aspects of the existing Site-wide Permit remain in effect for the duration of the modification.



### **Proposed Permit Modification Descriptions**

- Change to Permit Condition II.F.2.a: This permit condition was identified as having an incorrect regulatory citation during the Department of Ecology's (Ecology) Groundwater Operation and Maintenance Dangerous Waste Compliance Inspection on May 19, 20, 21, and 27, 2015, at the United States Department of Energy (USDOE) Hanford Site. In the Compliance Report section on Areas of Concern, Item 6, Permit Condition II.F.2.a., the text cites an incorrect WAC 173-160 regulation. The regulatory citation is being changed from WAC 173-160-030 to WAC 173-160-410(13), to provide a definition for Resource Protection Well.
- Addition of Permit Condition II.F.4: A new permit condition is being added to document the change in due date for the required annual groundwater report (WAC 173-303-390) for Dangerous Waste Management Units under interim status groundwater monitoring requirements. The current regulatory required annual due date is March 1. USDOE, the Environmental Protection Agency (EPA), and Ecology agreed that a combined annual report (Report), which includes all groundwater monitoring data for a calendar year, is the preferred format for all programs which use the data. To allow enough time for completion of the Report each year, Ecology is changing the annual due date to July 31. The decision to make the change was documented in the referenced letter from Ecology that allowed USDOE to submit the 2014 Report on July 31, 2015.
- Change to Attachment 9 - Permit Applicability Matrix: Attachment 9 is being updated to include Permit Condition II.F.4 and to correct a missing notation for existing Permit Condition II.F.2.a.

### **Annual Groundwater Report History**

In 2009, USDOE, EPA, and Ecology discussed the Report format. EPA and Ecology significantly modified the format and content through Hanford's Cleanup Constraints Challenges Team process, with the state of Oregon and the Tribal Nations participation. The following major changes came out of this review process:

- The Report was issued for a USDOE fiscal year, from October 1 of a year to September 30 of the next year. The term of the Report was changed to cover a calendar year, which was the schedule that matched the WAC 173-303 regulations annual schedule for groundwater monitoring data.
- The Report includes all data from Resource Conservation and Recovery Act (RCRA), Comprehensive Environmental Response, Compensation, and Liability Act, Atomic Energy Act, and other miscellaneous project groundwater monitoring programs. Only the RCRA portion of the Report has a required due date of March 1 of each year.

The final data for a calendar year is available in January or February of the next year. Analysis of yearly data and the write-up of the evaluation of data takes at least four months in the next calendar year to produce a draft Report. The Report is then provided to the regulatory agencies for review.

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The current Report is over 1,000 pages and contains information on four major groundwater units in the Central Plateau, multiple groundwater units along the Columbia River, and numerous soil sites and facilities that have had leaks to the environment. This yields a Report that is much more complex than the regulations probably envisioned. History has shown that USDOE cannot obtain and analyze data, then write a Report on all these units and sites in three months. Since agreeing to prepare a combined Report, from 2010 to 2014, USDOE had to request due date extensions from Ecology. When the last extension to the due date was granted in 2014, Ecology made a decision to modify the Site-wide Permit, allowing more time for USDOE to prepare and issue this Report.

DVD Copies of the proposed permit modification are located at the Hanford Public Information Repositories in Richland, Spokane, and Seattle, Washington and in Portland, Oregon. The public can also view the proposed permit modification at the following locations.

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

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

The proposed permit modification, Statement of Basis, and Public Notice are also available online at the Ecology website at: <http://www.ecy.wa.gov/programs/nwp/commentperiods.htm>.

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

If there are any questions, please contact Debra Alexander, Site-wide Revision 8C Dangerous Waste Permit Coordinator, at [debra.alexander@ecy.wa.gov](mailto:debra.alexander@ecy.wa.gov) or (509) 372-7896.

Sincerely,



Suzanne Dahl  
Tank Waste Treatment Section Manager  
Nuclear Waste Program

da/jt  
Enclosure

Reference: Letter 15-NWP-099, dated June 1, 2015, from S. Dahl, Ecology to S. Charboneau, USDOE, "Change of Due Date for the Draft 2014 Annual Hanford Site Groundwater Monitoring Report (Report)"

cc: See page 4

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Dennis Faulk, EPA  
Cliff Clark, USDOE  
Mike Cline, USDOE  
Rob Hastings, USDOE  
Doug Hildebrand, USDOE  
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Naomi Jaschke, USDOE  
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Government Information  
University of Washington Suzzallo Library,  
Government Publications  
USDOE-ORP Correspondence Control  
USDOE Public Reading Room, CIC  
USDOE-RL Correspondence Control  
USEPA Region 10 Correspondence Control  
USEPA Region 10 Hanford Field Office  
Correspondence Control  
WCH Correspondence Control  
WRPS Correspondence Control

cc w/enc, DVD and hard copy:

Administrative Record: Hanford Site-wide Permit  
NWP Central File

cc w/o enc:

NWP Reader File