



DEPARTMENT OF
ECOLOGY
State of Washington

Statement of Basis

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

September 2010

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

Permittees

United States Department of Energy
(Owner/Operator)
Office of River Protection
P.O. Box 550
Richland, Washington 99352

Bechtel National, Inc.
(Co-Operator)
2535 Stevens Center Place
Richland, Washington 99354

The Washington State Department of Ecology (Ecology) has developed this Statement of Basis in accordance with the requirements of Washington Administrative Code (WAC) 173-303-840(2)(f)(iv). Its purpose is to present information on Ecology's tentative decision to modify Part III, Operating Unit 10, Waste Treatment and Immobilization Plant (WTP) of the Hanford Facility's Dangerous Waste Portion, Revision 8C, of the Resource Conservation and Recovery Act (RCRA) Permit for the Treatment, Storage, and Disposal (TSD) of Dangerous Waste, hereafter called the "WTP Permit."

This modification includes supporting technical information and engineering drawings for construction on the regulated portions of the WTP Pretreatment Facility (PTF), Low-Activity Waste (LAW) Facility, and High-Level Waste (HLW) Facility. In addition, this modification incorporates format changes to the WTP Permit appendices and changes to supporting information. It also contains a revision to the Permit Conditions III.10.C.9.d and III.10.C.9.h. Pursuant to WAC 173-303-830(3), only the conditions that are subject to this modification are reopened for comment.

Ecology has elected to prepare a Statement of Basis pursuant to WAC 173-303-840(2)(f)(iv) rather than a Fact Sheet. A Statement of Basis was prepared for previous major WTP Permit modifications. This process is being followed for permit modifications initiated by Ecology to 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 Permit Background
- 2.0 The WTP Permitting Process
- 3.0 Procedures for Reaching a Final Decision on the Draft Permit Modification
- 4.0 Proposed Modification to the Hanford Facility Permit, Part III, Operating Unit 10, WTP

Tables submitted by the Permittees for incorporation into the WTP Permit are at the end of this document.

1.0 Hanford Facility Permit Background

Ecology initially issued the WTP Permit for the Hanford facility in 1994. The WTP 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 TSD units at Hanford.

The WTP Permit is normally modified annually to incorporate newly permitted units; reflect Class 1, 2, and 3 modifications; and include minor changes in grammar, consistency, and presentation. 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 (DWP) issued by Ecology.

Approximately 50 TSD units at Hanford are operating or closing under RCRA final status standards.

Conditions of the WTP Permit are presented in six parts:

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

The WTP TSD Unit was added to the Unit-Specific Conditions for Final Status Operations (Part III) portion of the WTP Permit on September 25, 2002. The WTP Permit modification was effective on October 25, 2002. The WTP TSD Unit is currently being constructed under final status standards.

2.0 The WTP Permitting Process

The permitting of the WTP TSD Unit is using a phased (or stepped) approach. The first phase was completed on September 25, 2002, with issuance of a final permit allowing construction of the WTP LAW, PTF, and HLW facilities to commence and a compliance schedule to provide additional detailed information to Ecology. The compliance schedule addresses submittal of information necessary for construction of the rest of the WTP TSD Unit and eventual operation.

The second phase of permitting is implementation of the compliance schedule, which requires design and other information to be submitted for Ecology approval before regulated portions of the WTP TSD Unit are constructed. The third phase of permitting is implementation of the last portion of the compliance schedule, which requires updating portions of the DWP Application prior to facility start of operations. These portions of the WTP Permit are operational in nature and cannot be completed before the design is nearly complete (Contingency Plan, Closure Plan, and Training Plan). At completion of the three phases, the WTP TSD Unit will comply with all the applicable requirements of WAC 173-303 and, after receiving written permission from Ecology, can begin treatment and storage of dangerous and mixed waste.

The design submittals (second phase described above) 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 lowest level of the facilities (below-grade levels) and are submitted for regulated areas of each level of the facility before construction begins. This process was adjusted for some design packages. If the process system in the design package is located on more than one level in a WTP facility, the design package can address components on more than one level. This will prevent the confusion caused by one process system description being segmented into multiple design packages.

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

1. Secondary containment.
2. Primary containment (for example tanks, miscellaneous units [evaporators and melters], and containment buildings).
3. Other associated, regulated equipment (for example ancillary equipment, equipment associated with miscellaneous units, 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 (floor slope, sump location). 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 (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 that provides details for equipment on that level will be included in the WTP Permit before installation (for example materials of construction, pipe support details, pump types and their operating limits).

With each WTP facility consisting of multiple levels, the total number of design packages is large. Of the estimated 160 total design packages, approximately 30 remain to be incorporated into the WTP Permit. Ecology intends to group packages, where possible, to reduce the number of public comment periods.

The secondary containment, primary containment, and other associated, regulated equipment packages for different levels require repetitive information submittals in each package. Again, using tank systems as an example, most tanks will use the same construction specifications. The WTP Permit allows the Permittees to reference the previously submitted design information. Therefore, some design packages may consist mostly of references to information already provided.

Ecology is authorized, pursuant to WAC 173-303-830(4)(e), to grant Temporary Authorizations (TA) for the Permittees to start construction on a design package after Ecology approval, but before the draft permit modification process is complete. A Permittee is allowed to request a TA to implement a modification prior to public notice and comment, pursuant to WAC 173-303-830(4)(e)(ii)(A). To issue a TA, Ecology must find it meets the criteria as described in WAC 173-303-830(4)(e)(ii)(A) and -830(4)(e)(iii). The term of a TA is limited to 180 days with the potential for Ecology approval of two terms, with a maximum combined duration of 360 days, provided that the modification could be

classified as a Class 2 or 3 modification for the activity covered in the TA (WAC 173-303-830(4)(e)(iv)).

The purpose of a TA is to allow the timely implementation of a permit modification. Construction that takes place under a TA is at the Permittees' risk because public comment may require the Permittees to modify something that is already built. The submittal schedule developed by the Permittees will allow most design packages to undergo public comment and be incorporated into the WTP Permit prior to construction of those areas.

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 promulgated in Chapter 173-303 of the WAC, regulate the management of dangerous waste in Washington State. In accordance with WAC 173-303-800, facilities that treat, store, and/or dispose of dangerous waste must obtain a permit for these activities.

As required by WAC 173-303-840(3)(d) draft permit modifications to the WTP Permit will have a 45-day public comment period. The public comment period for this proposed permit modification begins on September 27, 2010, and ends on November 12, 2010. All comments received during the public comment period will be considered and responded to before final decisions are made on the proposed modifications. Regulatory requirements for public notice and involvement (for this proposed permit modification) are described in WAC 173-303-840(3) and (4).

Comments must be post-marked or received by e-mail no later than close of business (5:00 p.m. PST) November 12. Comments will be accepted if they are hand-delivered by close of business (5:00 p.m. PST) November 12 to the address below. Direct all written comments to:

Ms. Erika Holmes
Washington State Department of Ecology
3100 Port of Benton Blvd.
Richland, Washington 99354
E-mail address: ehol461@ecy.wa.gov

Ecology will consider and respond to all written comments 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 all who commented. If Ecology's decision includes substantial changes to the WTP Permit because of public comment, Ecology will initiate a new public comment period.

All commenters and the Permittees will receive a copy of the Responsiveness Summary and a notification of the final permit decision. Ecology's final permit decision may be appealed within 30 days after issuance of the final permit decision.

Copies of the WTP Permit for the Hanford facility, including the proposed permit modifications are available for review at the Hanford Public Information Repositories listed below. For additional information, call the Hanford Cleanup Hotline toll-free at 800-321-2008.

Hanford Public Information Repositories

Portland

Portland State University
Branford Price Millar Library
1875 SW Park Ave
Portland, Oregon 97201-3220
(503) 725-4552
Attn: Claudia Weston

Richland

Public Reading Room
2770 University Drive
Consolidated Information Center, Rm. 101L
Richland, Washington 99352
(509) 372-7443
Attn: Janice Pathree

Spokane

Gonzaga University
Foley Center
East 502 Boone
Spokane, Washington 99258-0001
(509) 313-3834
Attn: Linda Pierce

Seattle

University of Washington Suzzallo Library
Government Publication Division
Seattle, Washington 98195
(206) 543-9157
Attn: David Maack
Public Service: (206) 543-4664

This Statement of Basis for the proposed permit modification is also available online at www.ecy.wa.gov/programs/nwp/. If special accommodations are needed for public comment, please contact Erika Holmes, Department of Ecology, Nuclear Waste Program, at (509) 372-7880, or (360) 407-6006 (TDD).

4.0 Proposed Modifications to the WTP Permit

This proposed permit modification contains the following secondary containment design packages. New or revised documents submitted with the package are listed below. See Tables 1 and 2 for the entire list of documents:

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

The following additional items are also included in this draft modification (see Table 3 for the entire list of documents):

- 24590-WTP-PER-M-08-001 focuses on the Integrity Assessment Program and Schedule for DWP regulated equipment in the Analytical Laboratory and LAW Facility.
- 24590-WTP-PER-M-08-002 describes the Integrity Assessment Program and Schedule for DWP-regulated equipment in the PTF and HLW Facility.

- Correspondence Control Number (CCN) 169564 describes the IQRPE Structural Integrity Assessment Report for LAW Secondary Containment.
- 24590-PTF-PER-M-04-0010 addresses the leak detection capability in the PTF.
- 24590-PTF-PER-M-04-0011 addresses the waste removal capability for the PTF.
- 24590-WTP-PCN-ENV-10-002 revises the permit condition for notification to Ecology of minor nonconformance or construction deficiencies. These deficiencies are from approved designs, plans, and specifications in the construction of critical systems as defined in the Hanford Site-wide permit. The reporting period is changed from five calendar days to seven calendar days.

4.1 Incorporation of Several Class 1 and Class ¹1 Permit Modifications

This proposed permit modification incorporates the Class 1 and Class ¹1 Permit modifications shown below. These were previously approved by Ecology in accordance with WAC 173-303-830(4)(a) and are listed here as a courtesy.

- 24590-HLW-PCN-ENV-07-005, Class ¹1 Modification: Submits the IQRPE Structural Integrity Assessment Report for the HLW Facility Melter Cave Support Handling System Decontamination Tanks (HSH-TK-00001 and HSH-TK-00002) in Appendix 10.11.
- 24590-HLW-PCN-ENV-08-005, Class ¹1 Modification: Submits the Integrity Assessment for the Silver Mordenite Columns (HOP-ABS-00002 and HOP-ABS-00003) that are components of the HLW Melter Offgas Treatment Process System currently in Appendix 10.11.
- 24590-HLW-PCN-ENV-08-008, Class 1 Modification: Provides the updated Radioactive Liquid Waste Disposal Mechanical System Data Sheets. These replace the corresponding permit Mechanical Systems Data Sheets in Appendix 10.6.
- 24590-HLW-PCN-ENV-09-001, Class ¹1 Modification: Submits the updated HLW Facility Process Flow Diagram for the HLW Canister Decontamination Handling System. This replaces the permitted drawing currently in Appendix 10.1.
- 24590-HLW-PCN-ENV-09-003, Class ¹1 Modification: Submits the General Arrangement drawings for the HLW Facility elevations at -21'-0", 0'-0", 14'-0", 37'-0" and 58'-0" currently in Appendix 10.4.
- 24590-HLW-PCN-ENV-10-001, Class 1 Modification: Submits updated System Logic Description for the HLW Facility—Melter Process System (24590-HLW-PER-J-04-00004, Revision 1) to replace the document in Appendix 10.13.
- 24590-LAB-PCN-ENV-08-001, Class ¹1 Modification: Submits the IQRPE Report IA-3001891-001 for the Analytical Laboratory Building Radioactive Liquid Waste Disposal System Ancillary Equipment. This replaces the corresponding design intent IQRPE report in Operating Unit 10, Appendix 11.11.
- 24590-LAW-PCN-ENV-07-008, Class ¹1 Modification: Submits the final design IQRPE report for the ancillary equipment associated with the LAW Concentrate Receipt Process System vessels, replacing the design intent IQRPE report currently in Appendix 9.11.

- 24590-LAW-PCN-ENV-07-011, Class ¹1 Modification: Submits the final design IQRPE report for ancillary equipment associated with the LAW Radioactive Liquid Waste Disposal System vessels, replacing the design intent IQRPE reports currently in Appendix 9.11.
- 24590-LAW-PCN-ENV-08-002, Class ¹1 Modification: Submits the Equipment Assembly Drawing for the LAW Caustic Collection Tank to replace the permit drawing currently in Appendix 9.6.
- 24590-LAW-PCN-ENV-08-003, Class ¹1 Modification: Submits the updated LAW Facility General Arrangement Plan at Elevation -21 feet-0' to replace the permit drawing currently in Appendix 9.4.
- 24590-LAW-PCN-ENV-09-001, Class ¹1 Modification: Submits the IQRPE Structural Integrity Assessment Report for the LAW Waste Primary Offgas system (LOP) ancillary equipment and miscellaneous unit sub-system equipment associated with plant items in the LAW LOP system in Appendix 9.11.
- 24590-LAW-PCN-ENV-09-005, Class ¹1 Modification: Submits Corrosion Evaluations for the LAW Facility to replace the permitted Material Selection Data sheets in Appendix 9.9.
- 24590-PTF-PCN-ENV-05-028, Class ¹1 Modification: Submits updated Equipment Assembly Drawings for HLW Feed Receipt Vessel HLP-VSL-00022, HLW Lag Storage Vessels HLP-VSL-00027A and 00027B, and HLW Feed Blend Vessel HLP-VSL-00028 in Appendix 8.6.
- 24590-PTF-PCN-ENV-06-020 Class 1 Modification: Replaces Material Selection Data Sheets currently in Appendix 8.9. This also includes a Corrosion Evaluation for the PTF HLW Lag Storage and Feed Blending Process System Cesium Concentrate Receipt Breakpots.
- 24590-PTF-PCN-ENV-08-005, Class ¹1 Modification: Submits the Mechanical Data Sheet for the PTF Ultrafiltration Feed Preparation (UFP) Vessel UFP-VSL-00001A. The datasheet is being submitted to replace the datasheet currently in Appendix 8.6.
- 24590-PTF-PCN-ENV-08-024, Class ¹1 Modification: Submits Piping and Instrumentation Diagrams (P&IDs) for the PTF Cesium Ion Exchange Process System to replace the permitted P&IDs currently in Appendix 8.2.
- 24590-PTF-PCN-ENV-08-028, Class ¹1 Modification: Submits updated P&IDs for the PTF Vessel Vent Process System Caustic Scrubber, PVP-SCB-00002, and associated Bulge; and Cesium Nitric Acid Recovery Process System Evaporator Vessel, CNP-EVAP-00001, in Appendix 8.2.
- 24590-PTF-PCN-ENV-09-002 Class ¹1 Modification: Submits the new P&ID for the PTF Spent Resin Collection and Dewatering Process System Resin Collection. The diagram shows the Spent Resin Dewatering Disposal Transfer Cask design details (RDP-CASK-00001) and it will be added in Appendix 8.2.
- 24590-PTF-PCN-ENV-09-003, Class ¹1 Modification: Submits P&IDs for the PTF Cesium Nitric Acid Recovery System. These replace the permitting P&IDs currently in Appendix 8.2.
- 24590-PTF-PCN-ENV-09-004, Class ¹1 Modification: Submits P&IDs for the PTF Ultrafiltration Process System to replace the permitted P&IDs currently in Appendix 8.2.

- 24590-PTF-PCN-ENV-09-005, Class ¹1 Modification: Submits the P&IDs for the PTF Ultrafiltration Process System to replace the permitted versions in Appendix 8.2.
- 24590-PTF-PCN-ENV-09-006, Class ¹1 Modification: Updates the PTF General Arrangement Plan for the 56' elevation in Appendix 8.4.
- 24590-PTF-PCN-ENV-09-007 Class ¹1 Modification: Submits the updated PTF P&ID for the Pulse Jet Ventilation System Inlet Header to Demister Outlet to replace the permitted diagram currently in Appendix 8.2.
- 24590-PTF-PCN-ENV-09-008, Class ¹1 Modification: Submits updated PTF Process Flow Diagrams in Appendix 8.1.
- 24590-PTF-PCN-ENV-09-009, Class ¹1 Modification: Submits the updated P&IDs for the PTF Cesium Nitric Acid Recovery Process System (CNP) for the Plant Service Air Rack, Plant Wash Rack, and the CNP Rectifier and Condensers in Appendix 8.2.
- 24590-PTF-PCN-ENV-09-010, Class ¹1 Modification: Submits the PTF Waste Feed Receipt Vessels, Waste Feed Receipt Utility Services—Plant Service Air Rack P&ID drawings to provide additional detail to documents currently in Appendix 8.2.
- 24590-PTF-PCN-ENV-09-011, Class ¹1 Modification: Submits updated P&IDs for the PTF HLW Lag Storage and Feed Blending Process Systems in Appendix 8.2.
- 24590-PTF-PCN-ENV-09-012, Class ¹1 Modification: Replaces updated P&IDs for the PTF Pulse Jet Ventilation System and Vessel Vent Process System in Appendix 8.2.
- 24590-PTF-PCN-ENV-09-013, Class ¹1 Modification: Submits updated P&IDs for the PTF Plant Wash and Disposal System to replace the permitted documents in Appendix 8.2.
- 24590-PTF-PCN-ENV-09-014, Class ¹1 Modification: Submits updated P&IDs for the PTF Treated LAW Evaporation Process System to replace the permit versions currently in Appendix 8.2.
- 24590-PTF-PCN-ENV-09-016, Class ¹1 Modification: Submits Corrosion Evaluations for the PTF to replace the permitted Material Selection Datasheets currently in Appendix 8.9.
- 24590-WTP-PCN-ENV-09-001, Class ¹1 Modification: Submits document 24590-WTP-PER-CON-02-001, Installation of Tank Systems and Miscellaneous Unit Systems to replace the document currently in Appendix 7.12.

4.2 Supplemental Design Information

Tables 1, 2, and 3 list the design information included in this proposed permit modification and the proposed location in the WTP Permit. At issuance of the final WTP permit decision, Ecology will specify where each drawing or report resides in the WTP Permit. Paper copies of the page changes to the WTP Permit as a result of this modification will be placed in the Administrative Record. Duplicate sets of drawings will not be issued to the Permittees at issuance of the final permit decision in order to minimize the amount of duplicate paperwork, unless drawing changes are made as a result of public comment.

The letter issuing the final WTP Permit decision to the Permittees will include the current WTP Permit with the modifications on a CD.

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 additional information. To communicate the changes, the proposed permit modification 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 double-underlined. Only the text being changed in the current modification will be indicated by double-underlines 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 bold text in the affected appendix drawing lists.

At issuance of the permit modification, “clean” pages incorporating permit modifications will be issued to the Permittees and placed in the Administrative Record. All double-underlines and strikeouts will be removed. Documents and drawings listed in the appendices will not be bolded and will be incorporated by reference only.

In Ecology publication number 07-05-006, *Responsiveness Summary* (September 27, 2007), Ecology explained 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. Changes not yet incorporated into source documents are tracked by the Permittees using Document Change Notices (DCNs). 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 document for review. Source documents have been replacing permit version documents since September 2007.

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Table 1 – Design Information Submitted by Permittees for Incorporation into the Permit

Permit Design Package LAW-034, Revision 0, Tank System Secondary Containment For LAW ASX Samplers Table of Contents					
Engineering Document Title	Document Number	Revision	Permit Condition	Included	Remarks
IQRPE Structural Integrity Assessment Report for LAW ASX Secondary Containment (Sampler Cabinets)	CCN: 169565	00A	III.10.E.9.b.i	Y	
Permit Design Drawings					
LAW Facility General Arrangement Plan at Elevation 48' - 0"	24590-LAW-P1-P01T-00005	3	III.10.E.9.b.ii	Y	Associated DCNs included
DWP Liner Heights in the LAW Facility	24590-LAW-PER-M-02-002	7	III.10.E.9.b.ii	Y	Document renamed. Replaces Revision 6, 24590-LAW-PER-M-02-002, <i>Flooding Volume for LAW Facility</i> in Attachment 51, Appendix 9.8
Secondary Containment Design	24590-WTP-PER-CSA-02-001	9	III.10.E.9.b.ii III.10.E.9.b.iii	Y	Updated to incorporate ASX sampler secondary containment and leak detection and HLW drum transfer tunnel drip pan
Underground Pipe Protection	N/A	-	III.10.E.9.b.iv	N/A	Not Applicable for the ASX samplers
Material Selections for Building Secondary Containment/Leak Detection	24590-WTP-PER-M-02-001	3	III.10.E.9.b.v	N	Included in Attachment 51, Appendix 7.9
Installation of Tank Systems and Miscellaneous Unit Systems	24590-WTP-PER-CON-02-001	6	III.10.E.b.vi	N	Included in Attachment 51, Appendix 7.12 as approved in PCN 24590-WTP-PCN-ENV-09-001 (October 1, 2009)
Leak Detection in Secondary Containment Systems	24590-WTP-PER-J-02-002	4	III.10.E.9.b.ii III.10.E.9.b.v	Y	Consolidated to replace 24590-WTP-PER-J-02-001 and 24590-WTP-PER-J-02-002 in Attachment 51, Appendix 7.5

**Permit Design Package LAW-034, Revision 0,
Tank System Secondary Containment For LAW ASX Samplers
Table of Contents**

Engineering Document Title	Document Number	Revision	Permit Condition	Included	Remarks
LAW Facility Sump Data	24590-LAW-PER-M-02-001	5	III.10.E.9.b.vii	N	Included in Attachment 51, Appendix 9.5
Description of Access for Conducting Integrity Assessments	24590-WTP-PER-M-02-005	1	III.10.E.9.b.ix	N	Included in Attachment 51, Appendix 7.15
Integrity Assessment Program and Schedule for DWP-Regulated Equipment in the Analytical Laboratory and LAW Facility	24590-WTP-PER-M-08-001	0	III.10.E.9.b.	N	July 7, 2009, letter from Ecology (CCN: 201996) for incorporation into the proposed WTP Permit modification.
Prevention of Hydrogen Accumulation in WTP Tank Systems and Miscellaneous Treatment Unit Systems	24590-WTP-PER-PR-03-001	1	III.10.E.9.b.viii	N	U.S. Department of Energy Office of River Protection letter 03-ED-130 dated August 26, 2003, transmitting LAW-029 Revision 0 to Ecology

Table 2 – Design Information Submitted by Permittees for Inclusion into the Permit

Permit Design Package No. PTF-099, Revision 0					
Tank System Secondary Containment For PTF ASX Samplers					
Table of Contents					
Engineering Document Title	Document Number	Revision	Permit Condition	Included	Remarks
IQRPE Structural Integrity Assessment Report for PTF ASX Secondary Containment (Sampler Cabinets)	CCN: 169566	00A	III.10.E.9.b.i	Y	
Permit Design Drawings					
PTF General Arrangement Plan at Elevation 56’-0”	24590-PTF-P1-P01T-00003	4	III.10.E.9.b.ii	N	Provided in 24590-PTF-PCN-ENV-09-006, approved November 24, 2009, CCN: 209892 (Appendix 8.4)
Secondary Containment Design	24590-WTP-PER-CSA-02-001	9	III.10.E.9.b.ii III.10.E.9.b.iii	N	Included in Package LAW-034
Underground Pipe Protection	N/A	-	III.10.E.9.b.iv	N/A	Not Applicable to the ASX samplers
Material Selections for Building Secondary Containment/Leak Detection	24590-WTP-PER-M-02-001	3	III.10.E.9.b.v	N	Included in Attachment 51, Appendix 7.9
Installation of Tank Systems and Miscellaneous Unit Systems	24590-WTP-PER-CON-02-001	6	III.10.E.b.vi	N	Included in Attachment 51, Appendix 7.12 as approved in Permit Change Notice (PCN) 24590-WTP-PCN-ENV-09-001 (10/01/09)
Leak Detection in Secondary Containment Systems	24590-WTP-PER-J-02-002	4	III.10.E.9.b.ii III.10.E.9.b.v	N	Included in LAW-034 (consolidation of 24590-WTP-PER-J-02-001 and 24590-WTP-PER-J-02-002)
Sump Data for PTF	24590-PTF-PER-M-02-006	5	III.10.E.9.b.vii	N	Included in Attachment 51, Appendix 8.5
Description of Access for Conducting Integrity Assessments	24590-WTP-PER-M-02-005	1	III.10.E.9.b.ix	N	Included in Attachment 51, Appendix 7.15
Integrity Assessment Program and Schedule for DWP-Regulated Equipment in the PTF and HLW Facility	24590-WTP-PER-M-08-002	0	III.10.E.9.b	N	April 29, 2010, letter from Ecology (CCN: 217892) for incorporation into the proposed WTP Permit modification

Submitted by the Permittee for Incorporation into the Administrative Record

Engineering Document Title	Document Number	Revision	Permit Condition	Included	Remarks
Prevention of Hydrogen Accumulation in WTP Tank Systems and Miscellaneous Treatment Unit Systems	24590-WTP-PER-PR-03-001	1	III.10.E.9.b.viii	N	ORP Letter 03-ED-130 dated August 26, 2003, transmitting LAW-029, Revision 0 to Ecology

Table 3 - Design Information Submitted by Permittees

Engineering Document Title	Document Number	Revision	Remarks
Integrity Assessment Program and Schedule for DWP-Regulated Equipment in the Analytical Laboratory and LAW Facility	24590-WTP-PER-M-08-001	Rev. 0	CCN: 201996, July 7, 2009, letter from Ecology for incorporation into the proposed WTP Permit modification
Integrity Assessment Program and Schedule for DWP-Regulated Equipment in the PTF and HLW Facility	24590-WTP-PER-M-08-002	Rev. 0	CCN: 217892, April 29, 2010, letter from Ecology for incorporation into the proposed WTP Permit modification
IQRPE Structural Integrity Assessment Report for LAW Secondary Containment	CCN 169564	N/A	Consolidate and replace LAW secondary containment IQRPE reports in Appendix 9.11 of the WTP Permit
Leak Detection Capability in the PTF	24590-PTF-PER-M-04-0010	Rev. 2	CCN: 219312 transmitted the Leak Detection Capability in the PTF to Ecology for incorporation into the proposed WTP Permit modification.
Waste Removal Capability for the PTF	24590-PTF-PER-M-04-0011	Rev. 1	CCN: 216932 transmitted the Waste Removal Capability for the PTF to Ecology for incorporation into the proposed WTP Permit modification
Revise permit conditions III.10.C.9.d and III.10.C.9.h to allow documentation identified in the permit conditions to be submitted every 7 calendar days	24590-WTP-PCN-ENV-10-002	N/A	PCN-24590-WTP-PCN-ENV-10-002 transmitted to Ecology for incorporation into the proposed WTP Permit modification