



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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May 17, 2017

17-NWP-056

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Re: Proposed Class 3 Permit Modification 8C.2017.1D 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), Part III, Operating Unit Group 10, Waste Treatment and Immobilization Plant (WTP) Effluent Management Facility (EMF) Secondary Containment, WA7890008967

References: See page 3

Dear Madam and Gentlemen:

This letter transmits the Department of Ecology's (Ecology) proposed permit modification 8C.2017.1D to Part III, Operating Unit Group 10, Waste Treatment and Immobilization Plant, 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 Bechtel National Inc. (BNI) as co-operator.



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 WTP from November 28, 2016, through January 27, 2017. A public meeting was held on January 9, 2017, at the Richland Public Library from 5:30 p.m. to 6:30 p.m.

As a result of Ecology's completeness review, the following information was requested from the permittees:

- Dates for submittal of the additional design information for individual Dangerous Waste Management Units in the EMF, to support Ecology's development of the draft Interim Compliance Schedule that is included with the draft permit modification.
- Certified submittal of design drawings that details the EMF ventilation system as it continues into Building 26.
- Updated text for Chapter 4, *Process Information*, as appropriate to add necessary details about the ventilation system in Building 26.

Ecology received seven public comment submittals during the Permittees's public comment period. Ecology issued a Response to Comments document from the public comment period. The enclosed DVD includes the Response to Comments document (Ecology Publication 17-05-003) and is available on the Ecology website at: <https://fortress.wa.gov/ecy/publications/SummaryPages/1705003.html>.

Washington Administrative Code 173-303-840(3)(d) requires at least a 45-day public comment period for the draft permit modification. Ecology will hold this public comment period from May 22, 2017 through July 7, 2017. A public hearing is not scheduled, but Ecology will consider holding one if there is enough interest.

This proposed Class 3 permit modification applies to the WTP Permit and the addition of a new facility, the EMF. This permit modification is specifically for the permitting of the EMF Secondary Containment Systems. It incorporates new documents and drawings into the WTP permit as well as updating existing documents and drawings found in various permit appendices and in the Administrative Record.

The proposed modification also includes updates to existing WTP permit chapters to adds design and process changes needed to support design and construction of the EMF. Additionally, the modification incorporates a new Chapter specific to the EMF (Chapter 4G), into the WTP Permit to support design and construction of EMF Secondary Containment Systems.

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 this DVD are also available at the Hanford Public Information Repositories in Richland, Spokane, and Seattle, Washington, as well as Portland, Oregon. The DVD is 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

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Ecology received a request for a Temporary Authorization (TA) for portions of this Class 3 Permit Modification to initiate construct of the secondary containment system for the EMF. USDOE requested that the TA allow construction activities at Building 25 (Effluent Process Building), 25A (Effluent Drain Tank Building) and 26 (Effluent Utility Building).

Ecology approved the following activities to be conducted by the Permittees under the TA:

- Place foundation and walls for Building 25
- Place foundation and walls for Building 25A
- Place foundation and walls for Building 26
- Place foundation for the EMF Stack

If there are any questions regarding this permit modification, please contact Mandy Jones, WTP Lead Permit Writer, at mandy.jones@ecy.wa.gov or (509) 372-7916, or John Richardson, WTP Permit Writer, at john.richardson@ecy.wa.gov or (509) 372-7943.

Sincerely,



Suzanne Dahl
Dangerous Waste Permit Manager
Nuclear Waste Program

mj/mrb
Enclosure

cc: See page 4

References:

1. Letter 16-ECD-0056, dated November 21, 2016, "Submittal of Dangerous Waste Permit Class 3 Modification Notification for the Effluent Management Facility, 24590-BOF-PCN-ENV-15-002."
2. Letter 17-NWP-009, dated February 3, 2017, "Ecology's Completeness Review for the Class 3 Modification to the Hanford Facility Resource Conservation and Recovery Act Permit, Dangerous Waste Portion, Revision 8C, for Treatment, Storage, and Disposal of Dangerous Waste, Part III, Operating Unit Group 10, Waste Treatment and Immobilization Plant (WTP Permit)."
3. Letter 17-ECD-2017, dated February 13, 2017, "Submittal of Temporary Authorizaiton Request to Begin Installation of Effluent Management Facility Secondary Containment"

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cc electronic w/o enc:

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Ray Corey, USDOE
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CHPRC Correspondence Control
Environmental Portal
Gonzaga University Foley Center Library
Hanford Facility Operating Record
MSA Correspondence Control
PNNL Correspondence Control
Portland State University Library,
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 Hanford Field Office
Correspondence Control
WRPS Correspondence Control

cc w/enc, DVD and hard copy:

Administrative Record: Hanford Site-wide Permit
NWP Central File