



DEPARTMENT OF  
**ECOLOGY**  
State of Washington

**STATEMENT OF BASIS**

**Proposed 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 III, Operating Unit Group 10, Waste Treatment and Immobilization Plant,  
WA7890008967***

This page intentionally left blank.

## STATEMENT OF BASIS

**Proposed 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 III, Operating Unit Group 10, Waste Treatment and Immobilization Plant,  
WA7890008967**

### Permittees

United States Department of Energy  
Office of River Protection  
PO Box 450  
Richland, Washington 99352

Bechtel National, Inc.  
2435 Stevens Center Place  
Richland, Washington 99354

The Washington State Department of Ecology (Ecology) developed this Statement of Basis to fulfill the requirements of Washington Administrative Code (WAC) 173-303-840(2)(f)(iv).

The Statement of Basis provides information on Ecology's decision to modify the *Hanford Facility Resource Conservation and Recovery Act Permit, Dangerous Waste Portion, Revision 8C, for the Treatment, Storage, and Disposal of Dangerous Waste*, Part III, Operating Unit Group 10, Waste Treatment and Immobilization Plant (WTP), 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
- High-Level Waste (HLW) Facility
- Laboratory (LAB) Facility
- Balance of Facilities (BOF)

This modification also incorporates format changes to the WTP Permit appendices and changes to supporting information. Ecology chose to prepare a Statement of Basis as described in WAC 173-303-840(2)(f)(iv), rather than a Fact Sheet.

We prepared a Statement of Basis for previous major WTP Permit modifications. This process will be followed for all permit modifications that 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 Resource Conservation and Recovery Act Permit (Site-wide Permit).
- 2.0 The WTP Permitting Process.
- 3.0 Procedures for Reaching a Final Decision on the Draft WTP Permit Modification.
- 4.0 Proposed Modifications to the WTP Permit.

Also included at the end of the Statement of Basis are tables, provided by the Permittees, listing the design documents and drawings they submitted for incorporation into the WTP Permit.

## **1.0 HANFORD FACILITY RESOURCE CONSERVATION AND RECOVERY ACT PERMIT (SITE-WIDE PERMIT)**

Ecology first issued the Site-wide Permit in 1994. The Site-wide 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 treatment, storage, and disposal (TSD) units at Hanford.

Approximately 40 TSD units are operating or closing under Resource Conservation and Recovery Act final status standards.

Conditions of the Site-wide Permit are presented in six parts:

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

The WTP TSD Unit was added to Part III of the Site-wide Permit on September 25, 2002. The WTP Permit portion was effective on October 25, 2002. The WTP TSD Unit is currently being constructed under final permit status standards.

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 issued by Ecology.

The WTP Permit is modified as needed, typically one or more times a year, to incorporate Class 1, <sup>1</sup>1, 2, and 3 modifications; Agency-Initiated modifications; and minor changes in grammar, consistency, and presentation.

## **2.0 THE WTP PERMITTING PROCESS**

We are using a phased (or stepped) approach to permit the WTP TSD Unit. The first phase was completed on September 25, 2002, with issuance of a final Dangerous Waste Permit allowing construction of the LAW, PTF, HLW, LAB, and BOF facilities to start.

A WTP Interim Compliance Schedule for the United States Department of Energy provides Ecology additional detailed information addressing the submittal of design documents necessary to support construction of the rest of the WTP TSD Unit, and its eventual operation.

This second phase of permitting is included in the compliance schedule, and requires the Permittees to submit design and other information 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. This requires updating portions of the Dangerous Waste Permit Application and then modifying the WTP Permit prior to facility start-up operations. These portions (for example, Contingency Plan, Closure Plan, and Training Plan) of the WTP Permit are operational in nature and cannot be completed before the design is nearly complete.

When the three phases of permitting are completed, the WTP TSD Unit will comply with all the applicable requirements of WAC 173-303. Then, after receiving written permission from Ecology, the Permittees can begin treatment and storage of dangerous and mixed waste at the WTP.

The design submittals (second permitting phase) 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 before construction begins. This process was adjusted for some design packages. When the facility process systems are installed on more than one level, the design packages will address the associated components for each level. This prevents confusion caused by one process system description being segmented into multiple design packages.

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

1. Primary containment (for example, tanks, miscellaneous units [evaporators and melters], and containment buildings).
2. Secondary containment.
3. Other associated regulated equipment (for example, ancillary equipment, equipment associated with miscellaneous units, and 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 (for example, the floor slope, and sump locations).

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. The tank package would contain, 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 provides details for the equipment on that level that will be included in the WTP Permit before installation. Information in the package would include, for example, materials of construction, and pump types and their operating limits.

Because each WTP facility consists of multiple levels, many design packages are required. Of the estimated 180 design packages, approximately 40 remain to be incorporated in the WTP Permit.

The primary containment, secondary containment, and the other associated regulated equipment design packages for different levels require repetitive information submittals in each package. 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, so some design packages consist mostly of references to information already provided.

### **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 declared in WAC Chapter 173-303 regulate the management of dangerous waste in Washington State. WAC 173-303-800 requires facilities that treat, store, and/or dispose of dangerous waste to obtain a permit for these activities.

Regulatory requirements for public notice and involvement on permit modifications are described in WAC 173-303-840(3) and (4). As required by WAC 173-303-840(3)(d), draft modifications to the WTP Permit will have at least a 45-day public comment period. The public comment period for this proposed permit modification begins on September 2, 2014, and ends on October 20, 2014.

Comments must be post-marked, received by e-mail, or hand-delivered no later than close of business (5:00 p.m. PST) October 20, 2014. Direct all written comments to:

Heather John  
Washington State Department of Ecology  
3100 Port of Benton Blvd.  
Richland, Washington 99354  
E-mail address: [hanford@ecy.wa.gov](mailto:hanford@ecy.wa.gov)

In accordance with WAC 173-303-840(10)(c), when a permit is modified, only the conditions subject to modification are open for comment. All other aspects of the existing Permit remain in effect for the duration of the modification.

Ecology will consider and respond to all written comments on this permit modification 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 to all who commented. If the final decision includes substantial changes to the WTP Permit because of public comment, we will initiate a new public comment period.

Ecology will provide a Response to Comments document and a notification of the final permit decision to the Permittees and all others who commented. The final permit decision may be appealed within 30 days after issuance of that decision.

Copies of the WTP Permit, including the proposed permit modifications, are available for review at the Hanford Public Information Repositories. For additional information, call the Hanford Cleanup Hotline toll-free at 800-321-2008 or email [hanford@ecy.wa.gov](mailto:hanford@ecy.wa.gov).

## **Hanford Public Information Repositories**

### **Richland**

United States Department of Ecology  
Nuclear Waste Program Resource Center  
3100 Port of Benton Boulevard  
Richland, Washington 99354  
Contact: Valarie Peery (509) 372-7950

United States Department of Energy  
Administrative Record  
2440 Stevens Drive  
Richland, Washington 99354  
Contact: Heather Childers (509) 376-2530

United States Department of Energy  
Reading Room  
2770 Crimson Way  
Richland, Washington 99354  
Contact: Janice Parthree (509) 375-3308

### **Portland**

Portland State University  
Branford Price Millar Library  
1875 Southwest Park Avenue  
Portland, Oregon 97207  
Contact: Claudia Weston (503) 725-4542

### **Seattle**

University of Washington Suzzallo Library  
PO Box 352900  
Seattle, Washington 98195  
Contact: Hilary Reinert (206) 543-5597

### **Spokane**

Gonzaga University  
Foley Center  
502 East Boone Avenue  
Spokane, Washington 99258  
Contact: John Spencer (509) 313-6110

This Statement of Basis and Public Notice for the proposed permit modification is also available online at <http://www.ecy.wa.gov/programs/nwp/commentperiods.htm>. If special accommodations are needed for public comment, contact Heather John, Ecology, at 800-321-2008.

#### 4.0 PROPOSED MODIFICATIONS TO THE WTP PERMIT

This proposed permit modification contains the following package. New or revised documents submitted with the package are listed below. See Table 1 at the end of this document for the entire list of package documents.

***Design Package No. LAW-026A, Rev. 0, for Miscellaneous Unit Subsystems for LAW Facility LVP System (HEPA Preheaters LVP-HTR-00001A/B & -00003A/B)***

This design package addresses the design of the Offgas/Vessel Vent Process (LVP) System miscellaneous unit subsystems in the LAW Facility at the +48-foot elevation for the High-Efficiency Particulate Air (HEPA) preheaters.

The purpose of the LVP system is to remove gases and particulates from the combined primary offgas and vessel vent streams. The LVP system consists of preheaters, HEPA filters, mercury adsorbers, a catalytic oxidizer/reducer, a caustic scrubber, a caustic collection tank, and exhausters.

In the LVP system, melter offgas is combined with vessel vent offgas and heated in the HEPA preheaters to raise the offgas above the dew point. The heated offgas then passes through the HEPA filters to remove particulates. The offgas is treated to remove mercury, iodine, and acid gasses by activated carbon adsorption units, a recuperative heat exchanger, an electric heater, a catalytic oxidation unit, and a catalytic reduction unit. The catalytic oxidation unit oxidizes volatile organic compounds and carbon monoxide to form water and carbon dioxide; the catalytic reduction unit reduces oxides of nitrogen to form nitrogen and water using ammonia.

The offgas is then directed through the LAW melter offgas caustic scrubber to remove residual acid gasses, primarily sulfur oxides and carbon dioxide, and to provide final offgas cooling. Liquid effluent from the LAW melter offgas caustic scrubber is recirculated through the LAW caustic collection tank (LVP-TK-00001). The exhausters maintain negative pressure across the primary and secondary offgas equipment and discharge the treated offgas to the atmosphere through the LAW stacks.

This design package consists of:

- An assessment report signed by an Independent, Qualified, Registered, Professional Engineer (IQRPE) certifying the HEPA Preheater Design.
- A general arrangement plan.
- Drawing change notices for the general arrangement plan.
- A Process Flow Diagram change notice.
- Vendor mechanical drawing of the LVP HEPA Preheaters.
- Vendor mechanical data sheet for the LVP HEPA Preheaters.
- Corrosion evaluation for the LVP HEPA Preheaters.
- System description change notice for incorporation into the administrative record.

The complete list of documents included in the package is indicated by a “Y” in the “Included Column” on Table 1.

#### **4.1 Incorporation of Class 1 and Class <sup>1</sup>1 Permit Modifications (PCNs) and Permit Equivalency Notices (PENs)**

This proposed permit modification incorporates the Class 1 and Class <sup>1</sup>1 PCNs, and PENs listed below. These were previously approved by Ecology in accordance with WAC 173-303-830(4)(a) and are listed here as a courtesy.

- **24590-LAW-PCN-ENV-13-004, Class 1 Modification** provides updated General Arrangement drawings for the Low Activity Waste Facility at plan elevations (-)21'0", 3'0", 22'0", and 28'0" in Appendix 9.4.
- **24590-LAW-PCN-ENV-13-005, Class <sup>1</sup>1 Modification** provides the updated *IQRPE Structural Integrity Assessment Report for LAW LVP Caustic Collection Tank (LVP-TK-00001)* in Appendix 9.11.
- **24590-LAW-PEN-ENV-14-0001, Permit Equivalency Notice** provides the revised *IQRPE Structural Integrity Assessment Report for LAW LVP HEPA Filter Housings (LVP-HEPA-00001A/2A/3A and 00001B/2B)*, in Appendix 9.11.

#### **4.2 Supplemental Design Information**

Table 1 lists the design information included in this proposed permit modification and the proposed location in the WTP Permit. At issuance of the final WTP Permit, Ecology will specify where each drawing or report resides in the WTP Permit.

Paper copies of the page changes to the WTP Permit that result from this modification will be placed in the Administrative Record.

The letter issuing the final WTP Permit decision to the Permittees and Hanford contractors will include the current WTP Permit with the modifications on a DVD.

#### **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 information. To communicate the changes, proposed permit modifications 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.

When a WTP Permit modification is issued, "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.

Ecology publication number 07-05-006, *Responsiveness Summary* (September 27, 2007), explains 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.

The Permittees use Document Change Notices to track changes not yet incorporated into source documents. In some cases, Document Change Notices 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 WTP Permit for review. Source documents have been replacing permit version documents since September 2007.

This page intentionally left blank.

**Table 1 – Design Information Submitted by Permittees**

***Design Package No. LAW-026A, Rev. 0  
for the LAW Facility LVP System Miscellaneous Unit  
(HEPA Preheaters LVP-HTR-00001A/B & 00003A/B)***

**For Incorporation into the WTP Permit**

**Table of Contents**

<b>Engineering Document Title</b>	<b>Document Number</b>	<b>Revision</b>	<b>Permit Conditions</b>	<b>Included</b>	<b>Remarks</b>
IQRPE Independent Assessment Report	24590-CM-HC4-HXYG-00240-02-00010	00A	III.10.H.5.c.i	Y	Incorporate IQRPE report into Appendix 9.11
<b>Permit Drawings</b>					
General Arrangement Plan	24590-LAW-P1-P01T-00005	5	III.10.H.5.c.ii	Y	Incorporate Rev. 5 into Appendix 9.4, and remove Rev. 4
Drawing Change Notice for 24590-LAW-P1-P01T-00005	24590-LAW-P1N-P01T-00070			Y	Incorporate into Appendix 9.4
Drawing Change Notice for 24590-LAW-P1-P01T-00005	24590-LAW-P1N-P01T-00073			Y	Incorporate into Appendix 9.4
Drawing Change Notice for 24590-LAW-P1-P01T-00005	24590-LAW-P1N-P01T-00075			Y	
Process Flow Diagram	24590-LAW-M5-V17T-00010	4	III.10.H.5.c.ii	N	In Appendix 9.1
Drawing Change Notice for 24590-LAW-M5-V17T-00010	24590-LAW-M5N-V17T-00030			Y	Incorporate into Appendix 9.1
Piping & Instrumentation Diagram	24590-LAW-M6-LVP-00001002	0	III.10.H.5.c.ii	N	In Appendix 9.2
<b>Mechanical Drawing</b>					
Vendor – Mechanical Drawing for the LAW HEPA Filter Preheater	24590-CD-POA-MEE0-00003-03-00004 24590-CD-POA-MEE0-00003-03-00005	00H 00I	III.10.H.5.c.ii III.10.H.5.c.vi	Y	For incorporation into Appendix 9.6

Engineering Document Title	Document Number	Revision	Permit Conditions	Included	Remarks
<b>Mechanical Data Sheets</b>					
Vendor – HEPA Filter Preheater	24590-CD-POA-MEE0-00003-03-15-00007	00C	III.10.H.5.c.ii	Y	For incorporation in Appendix 9.6
<b>Engineering Specifications</b>					
Pressure Vessel Design and Fabrication	24590-WTP-3PS-MV00-T0001	4	III.10.H.5.c.ii III.10.H.5.c.iii	N	In Appendix 7.7
Seismic Qualification Criteria for Pressure Vessels	24590-WTP-3PS-MV00-T0002	3	III.10.H.5.c.ii III.10.H.5.c.iii	N	In Appendix 7.7
Positive Material Identification (PMI) for Shop Fabrication	24590-WTP-3PS-G000-T0002	8		N	In Appendix 7.7
Secondary Containment Design	24590-WTP-PER-CSA-02-001	10	III.10.H.5.c.ii III.10.H.5.c.iii	N	In Appendix 7.5
Underground Pipe Protection	Not applicable	-	III.10.H.5.c.iv	N/A	There are no underground pipes in the LAW facility El. 3 ft. and above
Corrosion Evaluation – HEPA Filter Preheater	24590-LAW-N1D-LVP-00009	1	III.10.H.5.c.iii III.10.H.5.c.v	Y	Incorporate Preheater Corrosion Evaluation in Appendix 9.9
LAW Vittrification Offgas System Bypass Analysis	24590-LAW-PER-PR-03-001	2	III.10.H.5.c.ix	N	In Appendix 9.18
Installation for Tank Systems and Miscellaneous Treatment Unit Systems	24590-WTP-PER-CON-02-001	6	III.10.H.5.c.x	N	In Appendix 7.2

**For Incorporation into the Administrative Record**

**Table of Contents**

Engineering Document Title	Document Number	Revision	Permit Condition	Included	Remarks
Structural Support Calculations for Off Spec, Non-Standard or Field Fabricated Miscellaneous Treatment Subsystems	Not Applicable - See Remarks	-	III.10.H.5.c.iii	N	There are no Off Spec, Non-Standard, or Field Fabricated Miscellaneous Unit Subsystems in the LAW Facility (Preheaters are vendor fabricated.)
System Description for LOP and LVP: LAW Melter Offgas	24590-LAW-3YD-LOP-00001	3	III.10.H.5.c.vii	N	In Administrative Record (CCN 261065)
System Description Change Notice – Update Chapter 6 Description of HEPA Preheaters	24590-LAW-3YN-LOP-00015	N/A	III.10.H.5.c.vii	Y	For incorporation into the Administrative Record
Material and Energy Balance	24590-WTP-RPT-PT-02-005	6	III.10.H.5.c.viii	N	In Administrative Record, ORP letter 11-ESQ-224 dated 10/25/11, Submittal of Mass and Energy Balance Information (CCN 241137)
	24590-WTP-RPT-PET-10-022	0			
	24590-WTP-MRR-PET-10-010	0			
Toxic Vapors and Emissions from WTP Tank Systems and Miscellaneous Treatment Unit Systems	24590-WTP-PER-PR-03-002	3	III.10.H.5.c.xi	N	In Administrative Record (CCN 178564)
Prevention of Hydrogen Accumulation in WTP Tank Systems and Miscellaneous Treatment Unit Systems	24590-WTP-PER-PR-03-001	1	III.10.H.5.c.xii	N	In Administrative Record (CCN 078481)