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DEPARTMENT OF ECOLOGY
NWP - RICHLAND
2014-LTR-1002
May 1, 2014



Stephanie Schleif
Washington Department of Ecology
3100 Port of Benton Blvd.
Richland, WA 99354

Ms. Linda Meyer
US EPA - Region 10
1200 Sixth Avenue
Suite 900, AWT-121
Seattle, WA 98101

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Re: Perma-Fix Northwest Richland, Inc. (PFNW), Mixed Waste Facility (MWF)
Site Identification No: WAR 0000 10355
Permit Condition I.B.3: PMR 134 - Replacement of In-Container Mixer & Clarification
of Wastes Processed in TT-03

Dear Ms. Schleif and Ms. Meyer,

PFNW is hereby submitting this permit modification request (PMR) in accordance with Permit Condition I.B.3 of the MWF RCRA/TSCA Permit. PFWN is requesting this PMR be reviewed and approved as a Class 3 modification in accordance with WAC 173-303-830, Appendix I, G.5.a for treatment of different wastes in tanks.

PFNW is proposing to replace the miscellaneous treatment unit called the In-Container Mixer (ICM). The ICM is a miscellaneous treatment unit regulated under the tank standards. The ICM is listed in the current RCRA/TSCA Permit as TT-03. The unit is being replaced because it is damaged beyond repair. The old ICM was properly designated and disposed of in accordance with WAC-173-303-140. The parts of the old ICM that came into contact with wastes during processing were disposed of as mixed waste. The remaining parts were disposed of as low level radioactive waste.

In addition, PFWN is proposing language be added to several attachments of the permit to address solid-phase and sludge wastes being brought from the Waste Storage Building and treated directly in the ICM.

If you have any questions regarding this PMR, please feel free to contact Richard Grondin at (509) 375-7026 or Barry Nichols at (509) 375-7001.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard Grondin", written over a horizontal line.

Richard Grondin
Perma-fix Northwest-Richland, Inc.
Vice President/General Manager

CC: Andrea Prignano (ECY)
Rick Bond (ECY)

Attachments:

1. Certification Statement
2. Permit Modification Summary Sheet
3. Permit Attachment BB (Redline Version)
4. Permit Attachment CC (Redline Version)
5. Permit Attachment EE (Redline Version)
6. Permit Attachment LL (Redline Version)
7. Permit Attachment NN (Redline Version)
8. Permit Attachment PP (Redline Version)
9. Permit Attachment RR (Revised Drawings)
10. Permit Attachment TT (Redline Version)
11. Permit Attachment VV (Deleted Version)
12. Permit Attachment VV (Replaced Version)
13. Permit Attachment VV (Added Version)

2014-LTR-1002

Attachment 1

Certification Statement

The following certification statement fulfills the requirements of Hazardous Waste Management Act, in accordance with WAC 173-303-810(13)(a), and Toxic Substance Control Act, in accordance with 40 CFR 761.3, for Perma-Fix Northwest Richland, Inc. permit for the Storage and Treatment of Mixed Waste and for the Storage and Disposal of Mixed-Toxic Substance Control Act (TSCA) Regulated Polychlorinated Biphenyl (PCB) Wastes.

The certification below covers the documentation and submission of the Permit Modification submitted under letter number 2014-LTR-1002, dated April 30, 2014.

As the Vice President/General Manager of the Mixed Waste Facility, I have the authority to certify on behalf of the corporation.

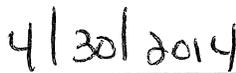
HWMA CERTIFICATION
[WAC 173-303-810(13)(a)]

“I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.”

PFNW-R Inc.



Richard Grondin Vice President/General Manager

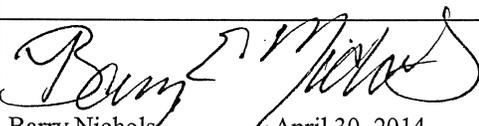
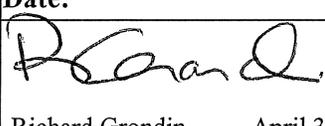


Date: April 30, 2014

2014-LTR-1002

Attachment 2

Permit Modification Summary Sheet

MWF Mixed Waste Permit Modification/Notification					
PMN#: 134	Unit Name: Mixed Waste Facility	Permit Number: WAR 0000 10355			
LTR#: 2014-LTR-1002	Unit Number: N/A	Permit Condition: I.B.3, I.B.4			
Description of Modification: ▼					
PFNW intends to replace the In-Container Mixer with a more superior mixing unit, change the cleaning process of the mixer paddle, delete obsolete information, fix typos, add language that clarifies that raw solid and sludge wastes can be processed in the ICM. These waste streams include numbers 206 and 207.					
Permit Modification Class¹: ▶		Class 1	Class¹1	Class 2	Class 3
					X
Justification for Classification of Modification²: ▶		The current ICM is damaged beyond repair and underpowered for the type of waste it was originally designed and intended to process. The current permit does not adequately address the ability of PFWN to send raw solid-phase and sludge waste directly from storage to the ICM.			
Relevant WAC 173-303-830, Appendix I Modification: ▶		G.5.a			
Enter wording of the modification from WAC 173-303-830, Appendix I citation: ▼					
5. Management of different wastes in tanks: a. That require additional or different management practices, tank design, different fire protection specifications, or significantly different tank treatment process from that authorized in the permit...					
Prepared By:	Date:	Reviewed By:	WDOE Accepted:		
					
Barry Nichols, Regulatory Compliance Officer	April 30, 2014	Richard Grondin, Vice-President and General Manager	April 30, 2014		

¹Class 1 modifications requiring prior Agency approval.

²If the proposed modification matches a modification listed in WAC 173-303-830 Appendix I, then enter the wording "Listed in Appendix I of WAC 173-303-830" here. Otherwise enter "PFWN-R, Inc. requests that the modification be classified as a Class (enter 1, 2, or 3 as appropriate) modification for the following reasons:" Then list the reasons.

2014-LTR-1002

Attachment 3

[Permit Attachment BB]

Part A Application (Redline)

2014-LTR-1002

Attachment 4

[Permit Attachment CC]

Waste Analysis Plan (Redline)

2014-LTR-1002

Attachment 5

[Permit Attachment EE]

Inspection Plan (Redline)

2014-LTR-1002

Attachment 6

[Permit Attachment LL]

Container Management Plan (Redline)

2014-LTR-1002

Attachment 7

[Permit Attachment NN]

Process Information (Redline)

2014-LTR-1002

Attachment 8

[Permit Attachment PP]

Process Engineering Description for the Stabilization Building (Redline)

2014-LTR-1002

Attachment 9

[Permit Attachment RR]

Construction Drawings (Revised)

2014-LTR-1002

Attachment 10

[Permit Attachment TT]

Equipment/Instrument List for Stabilization Building (Redline)

Tables: A, B, N, & Y

2014-LTR-1002

Attachment 11

[Permit Attachment VV]

Technical Specifications for Stabilization Building Processes (Deleted)

1. Spec. No: 11500 – Reagent Bin
2. Spec. No: 14100 – Bin Elevator
3. Spec. No: 14200 – Reagent Feeder

2014-LTR-1002

Attachment 12

[Permit Attachment VV]

Technical Specifications for Stabilization Building Processes (Replaced)

1. Spec. No: 11900 – Enclosure
2. Sect. No: 15000 – Title Page
3. Sect. No: 15000 – Table 1: Maintenance Schedule
4. Spec. No: 15130H – Pressure Differential Gauge
5. Spec. No: 15132 – In-Container Mixer
6. Spec. No: 15140 – Pumps

2014-LTR-1002

Attachment 13

[Permit Attachment VV]

Technical Specifications for Stabilization Building Processes (Added)

1. Spec. No: 15101 – Manual Valves
2. Spec. No. 15130 – Table of Contents
3. Spec. No. 15130 – Indication Devices
4. Spec. No: 15885 – Air Cleaning Devices