



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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November 29, 2017

17-NWP-171

Mr. Brian T. Vance, Manager  
Office of River Protection  
United States Department of Energy  
PO Box 450, MSIN: H6-60  
Richland, Washington 99352

Ms. Peggy McCullough, Project Director  
Bechtel National, Inc.  
2435 Stevens Center Place, MSIN: H4-02  
Richland, Washington 99354

Re: Proposed Class 3 Permit Modification 8C.2017.4D of the *Hanford Facility Resource Conservation and Recovery Act Permit, Dangerous Waste Portion 8C, for the Treatment, Storage, and Disposal of Dangerous Waste*, Part III, Operating Unit Group 10, Waste Treatment and Immobilization Plant (WTP Permit), WA7890008967

References: See page 3

Dear Mr. Vance and Ms. McCullough:

This letter transmits the Department of Ecology's (Ecology) proposed permit modification 8C.2017.4D to the Part III, Operating Unit Group 10, Waste Treatment and Immobilization Plant (WTP Permit), Analytical Laboratory Operations 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 – Office of River Protection as owner/operator and Bechtel National, Inc. as co-operator.

Ecology conducted a completeness review to ensure that all major components of the Permittees' submittal were addressed sufficiently to allow for a technical evaluation (Reference 1). As a result of Ecology's completeness review and Ecology's request, the Permittees provided the following supplemental information (Reference 2):

- Updated information for Permit Condition Table III.10.E.H, Laboratory Tank System Process and Leak Detection System Instruments and Parameters
- Updated Table 4H-3, Analytical Laboratory Tank Systems
- Updated Table 4H-5, Analytical Laboratory Sumps, Leak Detection Boxes, and Floor Drains/Lines

Ecology completed a completeness determination and a technical review of the permit modification. Ecology has determined that the certified permit modification and supplemental information (Reference 1 and Reference 2) is complete in accordance with Washington Administrative Code (WAC) 173-303-830(4)(c)(vi) and WAC 173-303-840(1)(b).



The Permittee's public comment period began July 3, 2017, through September 1, 2017, and a public meeting was on August 3, 2017, at the Richland Library. Ecology received seven public comments during the Permittee's public comment period. Ecology's Response to Comments document (Ecology Publication 17-05-013) from this public comment period is enclosed. The Response to Comments document is also available on Ecology's website at <https://fortress.wa.gov/ecy/publications/SummaryPages/1705013.html>

The proposed Class 3 Permit Modification focuses on the operations of the Analytical Laboratory (Lab) and provides the operating details for the Lab under the Direct Feed Low-Activity Waste configuration. Revisions needed to support the operations of the Lab in this modification include:

- Part III, WTP Unit Specific Permit Conditions
- Chapter 4H, Analytical Laboratory
- Chapter 6A, Inspection Plan
- Chapter 8, Personnel Training

The current WTP Permit contains design information related to the construction of the Lab. This design information will remain in the permit until Ecology has confirmed that construction of the Lab is certified complete.

Ecology will hold a second public comment period from December 4, 2017, through January 19, 2018. This comment period initiates the second part of the Class 3 Modification. The WAC 173-303-840(3)(d) requires at least a 45-day public comment period for a draft permit modification. A public hearing is not scheduled, but Ecology will consider holding one if there is enough interest.

In addition, the Permittees submitted package WTP-001 for Secondary Containment Devices (Reference 3). Ecology accepted the package, and it is incorporated into the proposed permit for public review during the second public comment period.

Before making any final permitting decisions, Ecology will consider all comments received during the public comment period for the draft permit modification.

The proposed draft permit modification is on the enclosed DVD and is available on Ecology's website at: <http://www.ecy.wa.gov/programs/nwp/commentperiods.htm>. Copies of the DVD are also available at the Hanford Public Information Repositories in Richland, Spokane, and Seattle, Washington, as well as Portland, Oregon.

Mr. Vance and Ms. McCullough  
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A hard copy and DVD are on file at the locations listed below:

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

Individuals can request copies of the DVD by contacting Ecology's Resource Center at (509) 372-7950.

If there are any questions, please contact Yoana Lucatero, WTP Permit Writer, at [yoana.lucatero@ecy.wa.gov](mailto:yoana.lucatero@ecy.wa.gov) or (509) 372-7917.

Sincerely,



Suzanne Dahl  
Dangerous Waste Permit Manager  
Nuclear Waste Program

yl/mrb  
Enclosure

cc: See page 4

References:

1. Letter 17-ECD-0041, dated June 26, 2017, "Submittal of Dangerous Waste Permit Class 3 Modification Notification for the Analytical Laboratory, 24590-LAB-PCN-ENV-16-002"
2. Letter 17-ECD-0068, dated November 08, 2017, "Submittal of Supplemental Information to Support Permit Modification 24590-LAB-PCN-ENV-16-002"
3. Letter 17-ECD-0070, dated November 24, 2017, "Submittal of Dangerous Waste Permit Package No. WTP-001, Revision 0, to Support Secondary Containment Devices"

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