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STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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November 30, 2016

16-NWP-201

Mr. Kevin W. Smith, 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: Approval of 24590-LAW-PCN-ENV-14-007, Class <sup>1</sup>1 Modification to 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 Permit), WA7890008967*

Reference: See page 2

Dear Mr. Smith and Ms. McCullough:

The Department of Ecology approves the referenced Class <sup>1</sup>1 Modification. The approved Hanford Facility RCRA Permit Modification Notification Form is enclosed.

This modification provides the updated Piping and Instrumentation Diagrams (P&IDs) for the Low-Activity Waste (LAW) Radioactive Liquid Waste Disposal (RLD) System.

These changes are listed on the enclosure and replace the corresponding permit P&IDs for the LAW RLD System in Appendix 9.2 of the WTP Permit.

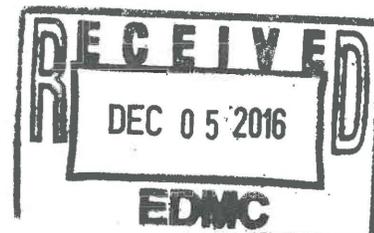
If there are any questions regarding this letter, please contact Yoana Lucatero, WTP Permit Writer, at [yoana.lucatero@ecy.wa.gov](mailto:yoana.lucatero@ecy.wa.gov) or (509) 372-7917.

Sincerely,

Suzanne Dahl  
Dangerous Waste Permit Manager  
Nuclear Waste Program

yl/aa  
Enclosure

cc: See page 2



Mr. Smith and Ms. McCullough  
November 30, 2016  
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Reference: Letter 16-ECD-0038, received August 29, 2016, "Submittal of Hanford Facility Resource Conservation and Recovery Act Permit Modification Notification Form 24590-LAW-PCN-ENV-14-007 Replace Piping and Instrumentation Diagrams for Low-Activity Waste Radioactive Liquid Waste Disposal System" 1239946

cc electronic w/enc:

Dave Bartus, EPA  
Dennis Faulk, EPA  
Mary Beth Burandt, USDOE-ORP  
Joanne Grindstaff, USDOE-ORP  
Bill Hamel, USDOE-ORP  
Lori Huffman, USDOE-ORP  
Gae Neath, USDOE-ORP  
Delmar Noyes, USDOE-ORP  
Bryan Trimberger, USDOE-ORP  
Cliff Clark, USDOE-RL  
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Serena Greagor, BNI  
Sandi Murdock, BNI  
Dan Roberson, BNI  
Jon Perry, MSA

Ken Niles, ODOE  
Gail Laws, WDOH  
Robbie Biyani, Ecology  
Jennifer Cantu, Ecology  
Annette Carlson, Ecology  
Nitya Chandran, Ecology  
Tracy Gao, Ecology  
Mandy Jones, Ecology  
Yoana Lucatero, Ecology  
Dan McDonald, Ecology  
John Richardson, Ecology  
Oliver Wang, Ecology  
Nancy Ware, Ecology  
BNI Correspondence Control  
Environmental Portal  
Hanford Facility Operating Record  
USDOE-ORP Correspondence Control  
USDOE-RL Correspondence Control

cc w/enc:

Russell Jim, YN  
Steve Hudson, HAB  
Administrative Record: Waste Treatment Plant (TSD #H-0-8)  
NWP Central File  
NWP Library

cc w/o enc:

Rod Skeen, CTUIR  
Gabriel Bohnee, NPT



Quarter Ending Sept. 30, 2016

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**Hanford Facility RCRA Permit Modification Notification Form**  
**Part III, Operating Unit 10**  
**Waste Treatment and Immobilization Plant**

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Page 2 of 3: Hanford Facility RCRA Permit, Part III, Operating Unit 10, Waste Treatment and Immobilization Plant  
Replace Piping and Instrumentation Diagrams (P&IDs) for the LAW Radioactive Liquid Waste Disposal  
System (RLD) in Appendix 9.2 of the Dangerous Waste Permit (DWP).

Submitted by Co-Operator:

Roger J. Landon      7/6/16  
Roger J. Landon      Date

Reviewed by ORP Program Office:

J. F. Grindstaff      8/23/16  
J. F. Grindstaff      Date

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<b>Hanford Facility RCRA Permit Modification Notification Form</b>			
Unit:		Permit Part:	
<b>Waste Treatment and Immobilization Plant</b>		<b>Part III, Operating Unit 10</b>	
<b>Description of Modification:</b>			
The purpose of this Class 1 prime modification is to update and replace the following P&IDs in Appendix 9.2 of the DWP:			
<b>Appendix 9.2</b>			
<b>Replace:</b>	24590-LAW-M6-RLD-00003002, Rev. 1	<b>With:</b>	24590-LAW-M6-RLD-00003002, Rev. 2
	24590-LAW-M6-RLD-00003003, Rev. 1		24590-LAW-M6-RLD-00003003, Rev. 2
<p>This modification requests Ecology approval and incorporation into the permit the specific changes to the P&amp;IDs indicated by revision notes and clouds. These documents include changes provided in applicable document change forms (e.g., DCN, SCN, SDDR, FCN, FCR, etc.). In addition, the P&amp;IDs include changes associated with the resolution to comments on change documents since the issuance of the last revision of the permitted documents.</p> <p>Significant changes common to all P&amp;IDs are summarized below:</p> <ul style="list-style-type: none"> <li>• Modified and added notes and references.</li> <li>• Incorporated changes from change documentation identified in the Notes section on each drawing.</li> <li>• Incorporated changes from Drawing Change Notices 24590-LAW-M6N-RLD-00077, 24590-LAW-M6N-M80T-00042 and 24590-LAW-M6N-M80T-00043.</li> </ul> <p>Significant changes specific to:</p> <p><u>24590-LAW-M6-RLD-00003002, Rev. 2</u></p> <ul style="list-style-type: none"> <li>• Changed safety radar level transmitters to thermal level switches/probes LE 2322 and LE 2323 for RLD-SUMP-00030 and LE 2324 and LE 2325 for RLD-SUMP-00032 (Grids C4 through F4 and C7 through F7). This change affects only the safety instruments for the detection of flooding in the process cell and does not affect the DWP leak detection radar level transmitters.</li> <li>• Deleted lines RLD-GR-01352-S11P-011/2 and RLD-GR-01353-S11P-011/2 and valves RLD-V-35590 and RLD-V-35591 (Grids C4, C7, D4 and D7).</li> <li>• Added a function to the sump level indicators for conversion of inches to gallons (Grids E3, E5, E6 and E8).</li> <li>• Re-routed the discharge of sumps RLD-SUMP-00029 through RLD-SUMP-00032 to vessel RLD-VSL-00004 (Grid B2).</li> <li>• Updated references to off-sheet connectors and P&amp;IDs (multiple grids).</li> </ul> <p><u>24590-LAW-M6-RLD-00003003, Rev. 2</u></p> <ul style="list-style-type: none"> <li>• Changed safety radar level transmitters to thermal level switches/probes LE 2326 and LE 2327 for RLD-SUMP-00034 and LE 2328 and LE 2329 for RLD-SUMP-00036 (Grids C4 through F4 and C7 through F7). This change affects only the safety instruments for the detection of flooding in the process cell and does not affect the DWP leak detection radar level transmitters.</li> <li>• Deleted lines RLD-GR-01349-S11P-011/2 and RLD-GR-01350-S11P-011/2 and valves RLD-V-35587 and RLD-V-35588 (Grids D4, D6, E4 and E6).</li> <li>• Added a function to the sump level indicators for conversion of inches to gallons (Grids E4 and E5).</li> <li>• Re-routed the discharge of sumps RLD-SUMP-00035 and RLD-SUMP-00036 to vessel RLD-VSL-00004 (Grid F2).</li> <li>• Updated references to off-sheet connectors and P&amp;IDs (Grid G2).</li> </ul>			

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This PCN updates information in Appendix 9.2 to reflect current design. This DWP component may be re-evaluated to confirm design adequacy. If the re-evaluation results in future design changes, the changes will be reviewed by Ecology in subsequent permit modifications.

The following outstanding change documents have been submitted to Ecology pursuant to Permit Condition III.10.C.9.h and are maintained in the WTP Operating Record:  
None

In accordance with Permit Condition III.10.C.2.e, this permit modification sent to Ecology may include page changes to the Permit, attachments, and permit application supporting documentation.

WAC 173-303-830 Modification Class:	Class 1	Class 1 <sup>1</sup>	Class 2	Class 3
Please mark the Modification Class:		X		

Enter relevant WAC 173-303-830, Appendix I Modification citation number: N/A  
Enter wording of WAC 173-303-830, Appendix I Modification citation:

In accordance with WAC 173-303-830(4)(d)(i), this modification notification is requested to be reviewed and approved as a Class 1<sup>1</sup> modification. WAC 173-303-830(4)(d)(ii)(A) states, "Class 1 modifications apply to minor changes that keep the permit current with routine changes to the facility or its operation. These changes do not substantially alter the permit conditions or reduce the capacity of the facility to protect human health or the environment. In the case of Class 1 modifications, the director may require prior approval."

Modification Approved/Concur: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> Denied (state reason below) Reason for denial:	Reviewed by Ecology:  S. Dahl	Date 11/30/16
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