



OFFICE OF RIVER PROTECTION

P.O. Box 450, MSIN H6-60
Richland, Washington 99352

APR 0 1 2015

15-ECD-0014

Ms. Jane A. Hedges, Program Manager
Nuclear Waste Program
Washington State
Department of Ecology
3100 Port of Benton Blvd.
Richland, Washington 99354

Ms. Hedges:

SUBMITTAL OF HANFORD FACILITY RESOURCE CONSERVATION AND RECOVERY ACT PERMIT MODIFICATION NOTIFICATION FORM 24590-LAW-PCN-ENV-14-006, WASTE TREATMENT AND IMMOBILIZATION PLANT INTERIM COMPLIANCE SCHEDULE ITEM 23, *SUBMIT ENGINEERING INFORMATION FOR LAW VITRIFICATION MISCELLANEOUS TREATMENT UNIT SUB-SYSTEM*

- References:
1. WA7890008967, "Dangerous Waste Portion of the Hanford Facility Resource Conservation and Recovery Act Permit for the Treatment, Storage, and Disposal of Dangerous Waste, Part III, Operating Unit 10, 'Waste Treatment and Immobilization Plant.'"
 2. Ecology letter from S. Dahl to K.W. Smith, ORP, and P. McCullough, BNI, "14-Day Notification for *Appendix 1.0 WTP Interim Compliance Schedule, Item 23, 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 (WTP Permit) WA7890008967,*" 15-NWP-044, dated February 26, 2015.
 3. ORP letter from K.W. Smith and M.G. McCullough, BNI, to J.A. Hedges, Ecology, "14-Day Notification, Hanford Facility Resource Conservation and Recovery Act, Appendix 1.0 Waste Treatment and Immobilization Plant Interim Compliance Schedule Item 23," 14-ECD-0056/CCN: 271717, dated January 12, 2015.

This letter transmits Hanford Facility Resource Conservation and Recovery Act Permit Modification Notification Form 24590-LAW-PCN-ENV-14-006, attached, for the Washington State Department of Ecology review and approval. The form describes a requested Class 1 modification to Reference 1.

Modification Notification Form 24590-LAW-PCN-ENV-14-006 submits a request to revise the completion date for the Waste Treatment and Immobilization Plant Interim Compliance Schedule Item 23, *Submit Engineering Information for LAW Vitrification Miscellaneous*

Treatment Sub-System, with prior Ecology approval (Reference 2) in accordance with WAC 173-303-830, Appendix I.A.5.

The permit change notice proposes that the completion date of the Waste Treatment and Immobilization Plant Interim Compliance Schedule Item 23 be revised from December 31, 2014, to December 31, 2015, as outlined in the joint Bechtel National, Inc. and U.S. Department of Energy, Office of River Protection 14-Day Notification Letter (Reference 3).

Washington State Department of Ecology comments resulting from review of this modification notification form and the associated information have been dispositioned.

If you have any questions, please contact me, or your staff may contact Gae M. Neath, Environmental Compliance Division, (509) 376-7828.

Rob G. Hastings

Rob G. Hastings, Assistant Manager
Technical and Regulatory Support

ECD:GMN

Attachment

cc w/attach:

B.L. Curn, BNI
B.G. Erlandson, BNI
C.M. Gallaway, BNI
M. McCullough, BNI
S.K. Murdock, BNI
D.C. Robertson, BNI
Administrative Record (WTP H-0-8)
BNI Correspondence
Environmental Portal, LMSI

cc w/o attach:

J. Cox, CTUIR
S.G. Harris, CTUIR
S.L. Dahl, Ecology
D. McDonald, Ecology
G.P. Bohnee, NPT
K. Niles, Oregon Energy
E.D. MacAlister, RL
R. Jim, YN

cc electronic:

J. Cantu, Ecology (2 hard copies)
A.S. Carlson, Ecology (5 hard copies, Public Review)
T.Z. Gao, Ecology
M.E. Jones, Ecology
J.K. Perry, MSA
A.C. McKarns, RL
D.J. Sommer, SCS

Attachment
15-ECD-0014
(4 Pages)

Hanford Facility RCRA Permit Modification Notification
Form 24590-LAW-PCN-ENV-14-006

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

Index

Page 2 of 3: Hanford Facility RCRA Permit, Part III, Operating Unit 10, Waste Treatment and Immobilization Plant
Revise the WTP Interim Compliance Schedule Item 23 in Appendix 1.0 of the Dangerous Waste Permit (DWP).

Submitted by Co-Operator:

Roger J. Landon 3/10/15
Roger J. Landon Date

Reviewed by ORP Program Office:

D. L. Noyes 3/31/2015
D. L. Noyes Date

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

Description of Modification:

The purpose of this modification is to revise the WTP Interim Compliance Schedule Item 23 in Appendix 1.0 of the Dangerous Waste Permit. The proposed new completion date is December 31, 2015.

Appendix 1.0**WTP Interim Compliance Schedule****Interim Compliance Schedule- WTP Facility**

	Compliance Schedule Submittal	Interim Compliance Date
23.	Submit engineering information for LAW Vitrification Miscellaneous Treatment Unit sub-system	12/31/2014 12/31/2015

Justification:

The required 14-day notification was submitted to Ecology in the Permittee letter from McCullough, M. G., BNI, and Smith, K. W., ORP, to Hedges, J. A., Ecology, "14-Day Notification, Hanford Facility Resource Conservation and Recovery Act, Appendix 1.0, Waste Treatment and Immobilization Plant Interim Compliance Schedule Item 23", 14-ECD-0056/CCN 271717, dated January 12, 2015.

The letter provided intermediate target dates with no contingency built-in for measuring progress toward completion of three LAW design packages which represented a point in time. Like any Project, target dates move as activities shift. To track progress toward completion of the WTP Interim Compliance Schedule Item 23 by 12/31/2015, the intermediate target dates for each remaining package below represent the current working schedule and show an earlier submittal for LAW-016 and slight delays for LAW-025 and LAW-028 than the January 2015 letter.

New target dates and information specific to each package are provided below:

LAW-016, Miscellaneous Unit Subsystem for LAW Facility LMP System at El. 3ft (Melter).

Completion of this package is ahead of the earlier forecast because finalizing the Corrosion Evaluation for review by the IQRPE was accelerated by 5 weeks.

Target Date for Early Ecology review 6/3/2015
Target Date for Comments resolved 8/5/2015
Target Date for Submit to Ecology 9/17/2015

LAW-025, Miscellaneous Unit Subsystem for LAW Facility LVP System (Selective Catalytic Oxidizer, Selective Catalytic Reducer, Electric Heater, and Heat Exchanger Skid).

Completion of calculations are later than forecast in the 14-day notification letter because of weld issues impacting physical design, physical changes to the equipment configuration, and correction of errors found during the final calculation review and approval cycle.

Target Date for Ecology Early review 3/24/2015
Target Date for Comments resolved 5/26/2015
Target Date for Submit to Ecology 7/8/2015

LAW-028, Miscellaneous Unit Subsystem for LAW Facility LVP System (LAW Melter Offgas Caustic Scrubber).

These dates have been reforecast since the letter was sent to Ecology, because Engineering resource allocation was reprioritized based on the LAW critical path concerns (TCO and WESP Vessel work). In addition, vendor

changes to certain internal component weights and sizes, constructability weld issues, and lack of vendor final assembly drawings continue to impact the completion of the calculation. Resolution of these issues have resulted in delays in finalizing the calculations.

The early review shown below is to verify that Ecology's previously submitted comments have been resolved.

Target Date for Early Ecology review 5/01/2015
 Target Date for Comments resolved 6/12/15
 Target Date for Submit to Ecology 7/20/2015

We anticipate that between now and December 31, 2015 target dates could move based on the IQRPE or Ecology review. DOE and BNI will status these activities in our routine interface meetings.

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 ¹	Class 2	Class 3
Please mark the Modification Class:		X		

Enter relevant WAC 173-303-830, Appendix I Modification citation number:
 A.5.a
 Enter wording of WAC 173-303-830, Appendix I Modification citation:
 A.5.a Change in interim compliance dates, with prior approval of the Director

Modification Approved/Concur: <input type="checkbox"/> Yes <input type="checkbox"/> Denied (state reason below) Reason for denial:	Reviewed by Ecology: _____ S. Dahl Date
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Interim Compliance Schedule- WTP		Facility
	Compliance Schedule Submittal	Interim Compliance Date
	permit	
17.	Submit descriptions of containment building management practices	12/30/2017
	PRETREATMENT PLANT MISC. UNITS SYSTEMS III.10.G.	
18.	Submit engineering information for secondary containment and leak detection system for the Pretreatment Plant Miscellaneous Unit Systems	Complete
19.	Submit engineering information for Pretreatment Plant Miscellaneous Unit Systems	12/31/2017
20.	Submit engineering information for Pretreatment Plant Miscellaneous Unit Systems equipment	12/31/2017
21.	Submit descriptions of management practices for the Pretreatment Miscellaneous Treatment System	06/30/2018
	LAW SHORT TERM MELTER UNIT III.10.H.5	
22.	Submit engineering information for LAW Vitrification Miscellaneous Treatment Unit secondary containment	Complete
23.	Submit engineering information for LAW Vitrification Miscellaneous Treatment Unit sub- system	12/31/2015
24.	Submit engineering information for equipment for each LAW Vitrification Miscellaneous Treatment Unit sub-system	Complete
25.	Submit descriptions of management practices for the LAW Vitrification Miscellaneous Treatment System	06/30/2018
26.	Submit LAW Vitrification Environmental Performance Demonstration Test Plan for Ecology review and approval	01/01/2018
	HLW SHORT TERM MELTER UNIT III.10.J.5	
27.	Submit engineering information for HLW Vitrification Miscellaneous Treatment Unit secondary containment	Complete
28.	Submit engineering information for HLW Vitrification Miscellaneous Treatment Unit sub- system	Complete
29.	Submit engineering information for equipment for each HLW Vitrification Miscellaneous	Complete