



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
3100 Port of Benton Blvd • Richland, WA 99352 • (509) 372-7950

April 15, 2008

Ms. Shirley J. Olinger, Manager
Office of River Protection
United States Department of Energy
P.O. Box 450, MSIN: H6-60
Richland, Washington 99352

RECEIVED
APR 21 2008
EDMC

Mr. William S. Elkins, Project Director
Bechtel National, Inc.
2435 Stevens Center Place, MSIN: H4-02
Richland, Washington 99354

Re: Submittal of Hanford Facility RCRA Permit Modification Notification Form
24590-HLW-PCN-ENV-07-003; Class ¹1 Modification to the Hanford Facility Resource
Conservation and Recovery Act (RCRA) Permit, Dangerous Waste Portion, for the
Treatment, Storage, and Disposal of Dangerous Waste, Part III, Operating Unit 10
(Waste Treatment and Immobilization Plant), WA7890008967

Dear Ms. Olinger and Mr. Elkins:

The Department of Ecology approves the referenced Class ¹1 Modification submitted
March 17, 2008. The approved Hanford Facility RCRA Permit Modification Notification Form
is enclosed.

Modification 24590-HLW-PCN-ENV-07-003 provides the updated *Leak Detection Capability in
the High Level Waste Facility* (24590-HLW-PER-M-04-002, Revision 3). This replaces the
current permit document in Appendix 10.18.

During Ecology's formal review of the document, editorial changes were identified that would
clarify Table 7.1. We recommend that you:

1. Change the title of the table to "Maximum Leak Distances for Each Room."
2. Remove the second (**) footnote.

These changes are editorial and do not require immediate action. Please make these changes in
the next revision of the document.



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During the transition period from permit drawings to engineering source drawings, the parties agree you may show in phantom items not requiring an installation inspection or inclusion in the Independent Qualified Registered Professional Engineer report. Ecology is approving the design changes identified in the Permittees' submittal. Decisions on the regulation of items shown in phantom will be made later. At the end of the transition period, permit submittals will contain engineering source documents. The submittals will be incorporated into the permit as described in Ecology Publication # 07-05-006 (www.ecy.wa.gov/biblio/nwp.html).

If there are any questions, contact me at 509-372-7882 or David Becker at 509-372-7990.

Sincerely,



Brenda Becker-Khaleel
WTP Permit Writer
Nuclear Waste Program

trw/jc
Enclosure

cc electronic w/enc:

Dave Bartus, EPA
John Eschenberg, USDOE
Lori Huffman, USDOE
Tony McKarns, USDOE
Gae Neath, USDOE
Don Sommer, USDOE
William Taylor, USDOE
Julie Colby, BNI
Brad Erlandson, BNI
Peggy Fisher, BNI
Stan Hill, BNI
Dennis Klein, BNI
Sandi Murdock, BNI
Suzette Thompson, FHI
Phil Peistrup, WGI

cc w/enc:

Administrative Record: Tank Waste Treatment Requirements ✓
Environmental Portal
Hanford Operating Record General File
USDOE-ORP Correspondence Control

Quarter Ending 3/31/2008

24590-HLW-PCN-ENV-07-003

Hanford Facility RCRA Permit Modification Notification Form					
Unit: Waste Treatment and Immobilization Plant		Permit Part & Chapter: Part III, Operating Unit 10			
Description of Modification:					
The purpose of this Class ¹ modification is to update the <i>Leak Detection Capability in the HLW Facility</i> (24590-HLW-PER-M-04-002) in Appendix 10.18 of the Dangerous Waste Permit. The following permit document is submitted to replace the document currently in Appendix 10.18.					
Appendix 10.18					
Replace:	24590-HLW-PER-M-04-002, Rev 2	With:	24590-HLW-PER-M-04-002, Rev. 3		
This modification requests Ecology approval and incorporation into the permit the specific changes to the document that are identified by revision bars. Revisions incorporate minor changes to Maximum Leak Travel Distance, including a comment provided by Ecology to clarify the distance to the HOP sumps from the HEMEs/SBS areas, and editorial changes. The following identifies the changes on the attached document.					
<ul style="list-style-type: none"> Revised Table 6.1 to update "Maximum Leak Travel Distance" column. Changes to the travel distance are based on the issued design drawings and the current data in the HLW 3D Model. Changes to the travel distance are insignificant and do not result in changes to the final leak detection calculations in column "24-Hour Leak Rate Detected (rounded)". Revised Table 6.1 to correct the total travel distance to sumps HOP-SUMP-00003 and HOP-SUMP-00008. This revised travel distance includes the distance from the HEMEs/SBS bermed area located above these sumps. Changes to the travel distance do not result in changes to the final leak detection calculations in column "24-Hour Leak Rate Detected (rounded)". Revised Table 7.1 to add HEMEs/SBS bermed areas (Room H-0106 and H-0117). Added footnotes to Table 6.1 and 7.1 for clarification. 					
WAC 173-303-830 Modification Class: ^{1 2}		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: 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 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 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: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No (state reason for denial)		Reviewed by Ecology:			
Reason for denial:		 B. Becker-Khaleel			
		4/15/08 Date			

¹ Class 1 modifications requiring prior Agency approval.

² If the proposed modification does not match any modification listed in WAC 173-303-830 Appendix I, then the proposed modification should automatically be given a Class 3 status. This status may be maintained by the Department of Ecology, or down graded to a Class '1, if applicable.

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24590-HLW-PCN-ENV-07-003

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

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Update *Leak Detection Capability in the HLW Facility* in Appendix 10.18 of the Dangerous Waste Permit.

Submitted by Co-Operator:

Reviewed by ORP Program Office:

D. A. Klein 2/11/08
D. A. Klein Date

S. J. Olinger 3/11/08
S. J. Olinger Date