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Department of Energy
Richland Operations Office
P.O. Box 550
Richland, Washington 99352

97-EAP-642

SEP 02 1997

Mr. Moses N. Jaraysi
Program Manager
Nuclear Waste Program
State of Washington
Department of Ecology
1315 West Fourth Avenue
Kennewick, Washington 99336-6018

Dear Mr. Jaraysi:

CLASS 1 MODIFICATIONS TO THE FINAL JOINT PERMIT FOR DANGEROUS WASTE RESEARCH, DEVELOPMENT, AND DEMONSTRATION TREATMENT AND STORAGE ACTIVITY (RD&D PERMIT)

Enclosed for your approval are Class 1 modifications to the RD&D Permit. This modification package has been initiated to facilitate closure of the RD&D Permit by providing closure conditions for the "filter test skid," the only portion of the RD&D Permit that operated. Closure of this equipment was not previously addressed by the RD&D Permit. The State of Washington Department of Ecology (Ecology) approved this closure approach in a letter dated June 5, 1997. The letter stated that the proposed changes constituted a Class 1 modification to the RD&D Permit requiring Ecology approval. A courtesy copy of that letter is provided for your reference.

Should you have any questions regarding this information, please contact Ellen M. Mattlin, U.S. Department of Energy, Richland Operations Office, on 376-2385; or Susan M. Price, Fluor Daniel Hanford, Inc., on 376-1653.

Sincerely,

James E. Rasmussen, Director
Environmental Assurance, Permits,
and Policy Division
DOE Richland Operations Office

William D. Adair, Director
Environmental Protection
Responsible Party for
Fluor Daniel Hanford, Inc.

Enclosure

cc w/encl:
EDMC, H6-08
W. D. Adair, FDH
R. Jim, YIN
D. Powaukee, NPT

S. M. Price, FDH
D. R. Sherwood, EPA
S. J. Skurla, Ecology
J. R. Wilkinson, CTUIR



ENCLOSURE

Class 1 Modifications to the Final Joint Permit
for Dangerous Waste Research, Development, and Demonstration
Treatment and Storage Facility

and

Courtesy Copy of Reference Letter

Consisting of 11 pages,
including cover page

CLASS 1 MODIFICATIONS TO
THE FINAL PERMIT FOR DANGEROUS WASTE RESEARCH, DEVELOPMENT, AND
DEMONSTRATION TREATMENT AND STORAGE ACTIVITY
(August 1997)

Page 1 of 4

Class 1 Modifications:
**Final Permit for Dangerous Waste Research, Development, and
Demonstration Treatment and Storage Activity**

1. Page 10 of 53, Attachment 10, Closure Plan: Delete Subsections 8.1 through 8.5 of the permit application.

Reason: Subsections 8.1 through 8.5 do not address closure of the filter test skid, only permanent Waste Water Pilot Plant equipment, piping, and secondary containment that was not constructed.

2. Page 29 of 52, Section II.K.1: After the first sentence add "The filter test skid is the sole portion of the RD&D Activity that operated and that requires closure under this permit. Other planned waste water testing facilities at 1706-KE and at the Liquid Effluent Retention Facility were not constructed."

Reason: In Ecology letter "Closure of Final Joint Permit for Dangerous Waste Research, Development, and Demonstration Treatment and Storage Activity (Permit Number WA7 89000 8967)", dated June 5, 1997, Ecology acknowledged that the filter test skid was the only portion of the RD&D activity that operated and will require closure.

3. Page 30 of 52, Section II.K.1.a: Delete and replace the first sentence with "Replace Sections 8.1 through 8.5 of the Closure Plan, Attachment 10, with the following:"

Reason: The deleted Closure Plan sections do not address closure of the filter test skid, only permanent Waste Water Pilot Plant equipment, piping, and secondary containment that did not operate.

4. Page 30 of 52, Section II.K.1.a: Add section II.K.1.a.1 as follows:

II.K.1.a.1 The Permittees shall close the filter test skid by decontamination in accordance with Attachment 10, Appendix 4G, of this permit to allow its nonregulated reuse or disposal; or, where decontamination is not appropriate, by disposal as dangerous waste or reuse as contaminated equipment.

Reason: This section was added to implement filter test skid closure direction provided in RL letter "Closure of The Joint Permit For Dangerous Waste Research, Development, And Demonstration Treatment And Storage Activity", dated April 17, 1997. This letter identifies Closure Plan Appendix 4G, Decontamination Procedure For Equipment Contaminated With Listed Constituents, as the procedure for filter test skid decontamination to achieve closure. This RL direction was approved by Ecology in the June 5, 1997-letter. This section also was revised to allow the options of equipment decontamination to allow its nonregulated reuse or disposal, and/or, if not decontaminated, to allow its reuse as contaminated equipment (e.g., for electrical pumps) or its disposal as dangerous waste.

**Class 1 Modifications:
Final Permit for Dangerous Waste Research, Development, and
Demonstration Treatment and Storage Activity**

5. Page 30 of 52, Section II.K.1.a: Add section II.K.1.a.2 as follows:

II.K.1.a.2 Filter test skid decontamination will occur at the 200 Area Effluent Treatment Facility or T Plant Complex.

Reason: This section was added to allow decontamination of the filter test skid to be performed at the LERF.

6. Page 30 of 52, Section II.K.1.a: Add section II.K.1.a.3 as follows:

II.K.1.a.3 No soil samples will be collected because the only documented spill was cleaned up.

Reason: This section was added to delete soil sampling because, as recognized by Ecology, the sole spill was completely cleaned up at the time of the spill.

7. Page 30 of 52, Section II.K.5: Delete and replace with: "The Permittees shall close the RD&D Activity within 180 days of the end of the forty-five (45) day notification period."

Reason: This change reflects the closure schedule provided in the RL April letter and approved by Ecology in the June letter.

8. Page 30 of 52, Section II.K.6: Delete this section and move to II.K.1.a.1.

Reason: Relocate this condition for coherence.

9. Page 30 of 52, Section II.K.7: Renumber this section to II.K.6.

Reason: Renumbering is necessary due to the deletion of Section II.K.6.

**Class 1 Modifications:
Final Permit for Dangerous Waste Research, Development, and
Demonstration Treatment and Storage Activity**

Replacement pages for the
Final Permit for Dangerous Waste Research, Development, and
Demonstration Treatment and Storage Activity

Pages 10, 29, and 30

Appendix 6A, Table 2, page APP 7A-7 of permit application, as last revised on October 30, 1992.

Appendix 6A, Table 3, page APP 7A-24 of permit application, as last revised on October 30, 1992.

Appendix 6A, Table 4, pages APP 7A-26 through APP 7A-28 of permit application, as last revised on October 30, 1992.

Appendix 6B, pages 1 through 49 of permit application, as last revised on April 2, 1992.

Appendix 6C, pages 1 through 29 of permit application, as last revised on September 28, 1990.

Appendix I, pages 1 through 31 of permit application, as last revised on September 28, 1990.

Attachment A, pages 1 through 6 of permit application, as last revised on September 28, 1990.

Attachment 9 Personnel Training Plan, consisting of:

Section 7.0, pages 7-1 through 7-6 of permit application, as last revised on April 22, 1992.

Section 7.0, Table 7-1, page T7-1 of permit application, as last revised on April 22, 1992.

Section 7.0, Table 7-2, page T7-2 of permit application, as last revised on April 22, 1992.

Section 7.0, Table 7-3, pages T7-3.1 through T7-3.7 of permit application, as last revised on April 22, 1992.

Attachment 10 Closure Plan, consisting of:

Subsection 8.6, page 8-10 of permit application, as last revised on March 19, 1993.

Appendix 4G, Enclosure 1, pages 1 through 3 of permit application, as prepared on June 5, 1991.

pressure indicator, or replace with calibrated pressure indicator. Frequency: Every 6 months".

II.H.2. The Permittees shall ensure that functional eyewash and emergency shower equipment is available for the duration of the RD&D Activity authorized by this permit, to include periods of subfreezing temperatures.

II.I. CONTINGENCY PLAN

II.I.1. The Permittees shall follow the procedures outlined in the Contingency Plan included as Attachment 8 of this Permit, except that the following changes to Attachment 8 of this Permit are hereby made:

II.I.1.a. Appendix 6A, pages APP 7A-1 through APP 7A-35, Table 2, page APP 7A-7, Table 3, page APP 7A-24, Table 6, page APP 7A-26, change the Hanford emergency response number from "811" to read "911".

II.I.1.b. Appendix 6B, pages 1 through 49, change the Hanford emergency response number from "811" to read "911".

II.I.1.c. Appendix 6C, pages 1 through 29, Appendix I, pages 1 through 31, and Attachment A, pages 1 through 16, change the Hanford emergency response number from "811" to read "911".

II.I.2. The single point-of-contact shall maintain the names, addresses, home and facility phone numbers of the Building Emergency Director and alternates for the 1706-KE Building and the 200 Area Tank Farms Building at all times and available for inspection by the Agency and the Department.

II.J. RECORDKEEPING AND REPORTING

In addition to the recordkeeping and reporting requirements specified elsewhere in this Permit, the Permittees shall comply with all applicable notifications, certifications and recordkeeping requirements described in 40 CFR §§ 264.73 and WAC 173-303-380.

II.K. CLOSURE

II.K.1. The Permittees shall meet the general performance standard as specified in 40 CFR § 264.111 and WAC 173-303-610(2) during closure of the RD&D Activity. The filter test skid is the sole portion of the RD&D Activity that operated and that requires closure under this permit. Other planned waste water testing facilities at 1706-KE and at the Liquid Effluent Retention Facility were not constructed. Compliance with 40 CFR § 264.111 and WAC 173-303-610(2) shall require closure of the RD&D Activity in accordance with the Closure

Plan, included as Attachment 10 of this Permit and condition II.K. of this Permit, except that the following changes to Attachment 10 of this Permit are hereby made:

- II.K.1.a Replace Sections 8.1 through 8.5 of the Closure Plan, Attachment 10, with the following:
 - II.K.1.a.1 The Permittees shall close the filter test skid by decontamination in accordance with Attachment 10, Appendix 4G, of this permit to allow its nonregulated reuse or disposal; or, where decontamination is not appropriate, by disposal as dangerous waste or reuse as contaminated equipment.
 - II.K.1.a.2 Filter system decontamination will occur at the 200 Area Effluent Treatment Facility or T Plant Complex.
 - II.K.1.a.3 No soil samples will be collected because the only documented spill was cleaned up.
- II.K.2. Minor deviations from the permitted closure procedures necessary to accommodate proper closure must be described in a narrative form with the closure certification statements. The Permittees shall describe the rationale for implementing minor changes as part of the narrative report. Within forty-five (45) days after completion of closure of the RD&D Activity the Permittees shall submit the certification statements and narrative report to the Administrator and Director.
- II.K.3. The Permittees shall amend the Closure Plan, Attachment 10 of this Permit, in accordance with 40 CFR § 264.112(b) and WAC 173-303-610(3) and -830(3) and (4), whenever necessary.
- II.K.4. The Permittees shall notify the Administrator and the Director by certified mail at least forty-five (45) days prior to the date the Permittees expect to begin closure of the RD&D Activity.
- II.K.5. The Permittees shall close the RD&D Activity within 180 days of the end of the forty-five (45) day notification period.
- II.K.6. The Permittees shall certify that the RD&D activity has been closed in accordance with the specifications in the Closure Plan, Attachment 10 of this permit, as required by 40 CFR § 264.115 and WAC 173-303-610(6).

Courtesy Copy of Referenced Letter



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

1315 W. 4th Avenue • Kennewick, Washington 99336-6018 • (509) 735-7581

June 5, 1997

Mr. James E. Rasmussen
U.S. Department of Energy
P.O. Box 550, MSIN: A5-15
Richland, WA 99352-0550

Dear Mr. Rasmussen:

Re: Closure of Final Joint Permit For Dangerous Waste Research, Development, and
Demonstration Treatment and Storage Activity (Permit Number WA7 89000 8967)

The Washington State Department of Ecology (Ecology) has reviewed the proposed closure activities and schedule for the filtration unit and ancillary equipment as submitted in your letter of April 21, 1997. The filtration testing was completed at the Liquid Effluent Retention Facility under the Final Joint Permit For Dangerous Waste Research, Development, and Demonstration Treatment and Storage Activity (RD&D Permit) (Permit Number WA7 89000 8967).

Ecology has determined that the changes to the closure plan, described in Attachment 3 of your letter, constitute a Class 1 modification to the permit under Washington Administrative Code (WAC) 173-303-830, Appendix 1, Section D.1.d. Ecology approves the changes and authorizes the U.S. Department of Energy (USDOE) to begin the closure activities as described in the schedule in Attachment 2 of your letter. These closure activities are judged appropriate based on the small scale and short duration of the RD&D activity. Within 90 days of this approval, USDOE is required by WAC 173-303-830 (4)(a)(i)(B) to send a notice of modification to all persons on the facility mailing list.

As required by WAC 173-303-610 (6), a certification of closure is due to Ecology 60 days after completion of the closure of the RD&D treatment unit. Following receipt of the closure certification, Ecology and the Environmental Protection Agency (EPA) will withdraw the RD&D Permit.

Mr. James E. Rasmussen
June 10, 1997
Page 2

Mr. Dave Bartus, EPA, has received a copy of the closure information and concurs with Ecology's approval.

If there are any questions about this letter, please contact me at (509) 736-3011.

Sincerely,



Steven J. Skurla, Project Manager
Nuclear Waste Program

SS:sb

cc: Dave Bartus, EPA
Doug Sherwood, EPA
Liz Bowers, USDOE
Cliff Clark, USDOE
Bill Adair, FDH
Jeff Luke, RFSH
J.R. Wilkinson, CTUIR
Donna Powauke, NPT
Russell Jim, YIN
Mary Lou Blazek, ODOE
Administrative Record: Liquid Effluents Consent Order