



0050882

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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June 14, 1999

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

Mr. William D. Adair
Fluor Daniel Hanford, Inc.
P.O. Box 1000, MSIN: H6-21
Richland, Washington 99352

Mr. Michael C. Hughes
Bechtel Hanford, Inc.
P.O. Box 969, MSIN: H0-09
Richland, Washington 99352

Mr. Richard S. Watkins
Pacific Northwest National Laboratory
P.O. Box 999, MSIN: P7-75
Richland, Washington 99352



Dear Messrs. Rasmussen, Adair, Hughes, and Watkins:

Re: Quarterly Notification of Class 1 Modifications to the Hanford Facility
Resource Conservation and Recovery Act (RCRA) Permit, Dangerous
Waste Portion (Quarter Ending March 31, 1999 – Condition I.C.3)

The Washington State Department of Ecology (Ecology) has reviewed the above-referenced quarterly Class 1 Modifications. Enclosed are the Modification Notification Forms indicating which Modifications Ecology has approved. Modifications for this quarter included updating information in Part III, Chapter 4, (Liquid Effluent Treatment Facility and 200 Area Effluent Treatment Facility) and Chapter 5 (242-A Evaporator).

Messrs. Rasmussen, Adair, Hughes, and Watkins

June 21, 1999

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A Modification Notification Form for updating the Legal Description, Chapter 2, was also included in this Modification request. Ecology approved this Modification on January 7, 1999, by signing the Modification Notification Form. This particular change coincided with issuance of Mod D of the Permit, and as such, was incorporated into that Modification.

The Modification Notification Form updating the Legal Description in the Dangerous Waste Portion of the Permit (Attachment 2), also included a Modification to the Hazardous and Solid Waste Amendments (HSWA) Portion (Chapter 4) of the State Dangerous Waste Permit. As you know, Ecology is currently undergoing the process of transferring legal authority and administrative responsibility for RCRA corrective action from the U.S. Environmental Protection Agency (EPA) to Ecology. Until this transfer is complete, however, RCRA corrective action is regulated solely under the authority of the federal HSWA component of the Site-Wide Permit. The U.S. Department of Energy (USDOE) will need to contact EPA to propose changes to that portion of the Permit. Until such time as the HSWA portion of the Hanford Federal Facility Permit is formally modified, that portion of the Hanford Federal Facility proposed for deletion from the corrective action definition of facility will continue to be regulated under the federal HSWA Permit. I apologize for any confusion that may have been created by Ecology's actions regarding this particular issue.

Enclosure 1 consists of the Class 1 Modifications that Ecology has approved. If you have any questions or comments regarding this letter, please contact me at (509) 736-5715.

Sincerely,


Laura Ruud, Permit Specialist
Nuclear Waste Program

LR:ld

Enclosure

cc w/encl.: Ellen Mattlin, USDOE
Suzette Thompson, FDH
Gary Robinson, BHI
Alice Ikenberry, PNNL
Harold Tilden, PNNL
J.R. Wilkinson, CTUIR
Donna Powaukee, NPT
Russell Jim, YIN
Administrative Record: Site Wide Permit

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1 **5.0 GROUNDWATER MONITORING [D-10]**

2 **5.1 EXEMPTION FROM GROUNDWATER PROTECTION REQUIREMENTS**
3 **[D-10a]**

4 A waiver from the groundwater monitoring requirements as allowed under WAC 173-303-645 is not
5 requested. Therefore, the requirements of the Washington Administrative Code for groundwater
6 monitoring are applicable to the LERF.

7 **5.2 INTERIM STATUS PERIOD GROUNDWATER MONITORING DATA [D-10b]**

8 Information on interim status groundwater monitoring activities is provided in *Interim Status Ground*
9 *Water Monitoring Plan for the 200 East Area Liquid Effluent Retention Facility* (WHC 1991a), in
10 *Hanford Site Groundwater Monitoring for Fiscal Year 1996* (PNNL 1997a), and in the Hanford
11 Environmental Information System. There have been no significant detections of the indicator parameters
12 that could be attributed to the LERF.

13 **5.3 AQUIFER IDENTIFICATION [D-10c]**

14 The characteristics of the uppermost aquifer beneath the LERF and the regional physiographic, geologic,
15 and hydrogeologic setting of the LERF are summarized in Chapter 5.0 of the General Information Portion
16 (DOE/RL-91-28).

17 **5.4 CONTAMINANT PLUME DESCRIPTION [D-10d]**

18 A description of the contaminant plumes existing beneath the 200 East Area and 200 West Area is
19 provided in Chapter 5.0 of the General Information Portion (DOE/RL-91-28).

20 **5.5 DETECTION MONITORING PROGRAM [D-10e]**

21 Interim status groundwater monitoring will be continued until a final status groundwater monitoring plan
22 is submitted by DOE and approved by Ecology. The approved final status groundwater monitoring plan
23 will be implemented immediately on approval and will be submitted for incorporation as a modification
24 to the LERF permit. The ultimate goal is to develop a consolidated groundwater monitoring plan for the
25 Hanford Site, which will supersede the LERF specific final status groundwater monitoring plan.

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Hanford Facility RCRA Permit Modification Notification Form

Unit:
242-A Evaporator

Permit Part & Chapter:
Part III, Chapter 5 and Attachment 35
[Appendix 4A]

Description of Modification:

Appendix 4A, Table 4A-1:

Table 4A-1. Process and Instrumentation Diagrams.

System	Drawing Number	Outstanding ECNs	Drawing Title
Vapor-Liquid Separator	H-2-98988 Sh 1 Rev 5	ECN-647911 ECN-647883	P & ID Evap Recirc System
Reboiler/Recirculation Line	H-2-98988 Sh 2 Rev 4	ECN-613444	P & ID Evap Recirc System
Slurry System	H-2-98989 Rev 9	None	P & ID Slurry System
Condensate Collection Tank	H-2-98990 Sh 1 Rev 8	ECN-610627 ECN-610628 ECN-642198	P & ID Process Condensate System
Secondary Containment Drain System	H-2-98995 Sh 1 Rev 9 Rev 10	ECN-706940 ECN-706942	P & ID Drain System
Secondary Containment Drain System	H-2-98995 Sh 2 Rev 4	None	P & ID Drain System
Condensers	H-2-98999 Rev 10 Rev 11	None	P & ID Vacuum Condenser System
Pump Room Sump	H-2-99002 Rev 5	ECN-647885	P & ID Jet Gang Valve System
Condensate Recycle System	H-2-99003 Rev 9	ECN-627940	P & ID Filtered Raw Water System

Modification Class: ^{12 3}

Please check one of the Classes:

Class 1	Class ¹ 1	Class 2	Class 3
X			

Relevant WAC 173-303-830, Appendix I Modification: A.1.

Enter wording of the modification from WAC 173-303-830, Appendix I citation:

A. General Permit Provisions

1. Administrative and Informational changes.

Submitted by Co-Operator:	Reviewed by RL Program Office:	Reviewed by Ecology:
<i>Kenneth J. Swoboda</i> for J. D. Williams	<i>Allen E. Bilson</i> H. E. Bilson	<i>[Signature]</i> B. Julian
3/16/99 Date	4/6/99 Date	4/27/99 Date

¹Class 1 modifications requiring prior Agency approval.

² This is only an advanced notification of an intended Class ¹1, 2, or 3 modification, this should be followed with a formal modification request, and consequently implement the required Public Involvement processes when required.

³ 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 ¹1, if appropriate.

Hanford Facility RCRA Permit Modification Notification Form

Unit:
Hanford Facility RCRA Permit

Permit Part & Chapter:
List of Attachments
Dangerous Waste Portion, Attachment 2
HSWA Portion, Attachment F

Description of Modification:

Dangerous Waste Portion, Attachment 2, and HWSA Portion, Attachment F:

Note: The format of the legal description has changed; however, the boundaries are the same with the exception the requested change below.

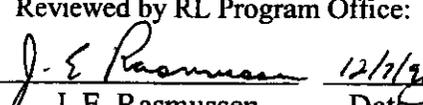
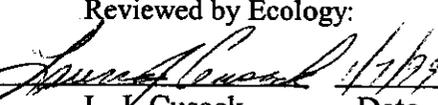
- _____ Thence S. along said E. right of way line to a point on the N. right of way line of Spengler Street, a platted street;
- _____ Thence W. 145 feet to the W. right of way line of Stevens Drive;
- _____ Thence S. to a point 30 feet N. of the S. line of sec. 27, T.10N., R.28 E.W.M.;
- _____ Thence W. along a line 30 feet N. of, and parallel with, the S. line of sec. 27 to the E. line of the S.W. 1/4 of the S.E. 1/4 of said section;
- _____ Thence N. along the E. line of the S.W. 1/4 of the S.E. 1/4 of sec. 27 to the S.E. corner of the N.W. 1/4 of the S.E. 1/4 of said sec. 27;
- _____ Thence W. along the S. line of the N.W. 1/4 of the S.E. 1/4 to the W. line of the E. 1/2 of sec. 27;
- _____ Thence N. along the W. line of the E. 1/2 of sec. 27, and of the E. 1/2 of sec. 22 and the E. 1/2 of sec. 14 to the N. right of way line of Horn Rapids Road;
- _____ Thence ~~containing~~ westerly and northwesterly along the N. right-of-way line of Horn Rapids Road 26,000 ~~28,600~~ feet more or less to the line's intersection with the N. right-of-way line of State Highway 240, in the N.E. 1/4 of sec. 11, T.10N., R.27E.W.M.;

Modification Class: ^{1 2 3}	Class 1	Class ¹ 1	Class 2	Class 3
Please check one of the Classes:				X

Relevant WAC 173-303-830, Appendix I Modification: N/A, Requesting review and approval as Class ¹1.

Enter wording of the modification from WAC 173-303-830, Appendix I citation:

Requesting under WAC 173-3003-830(3)(b)(ii)(4)(d) Other Modifications. (i) In the case of modifications not explicitly listed in Appendix I of this section, the permittee may submit a Class 3 modification request to the department, or he or she may request a determination by the director that the modification should be reviewed and approved as a Class 1 or Class 2 modification. If the permittee requests that the modification be classified as a Class 1 or 2 modification, he or she must provide the department with the necessary information to support the requested classification.

Submitted by Co-Operator:	Reviewed by RL Program Office:	Reviewed by Ecology:
 W. D. Adair Date	 J. E. Rasmussen Date	 L. J. Cusack Date

¹ Class 1 modifications requiring prior Agency approval.

² This is only an advanced notification of an intended Class ¹1, 2, or 3 modification, this should be followed with a formal modification request, and consequently implement the required Public Involvement processes when required.

³ 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 ¹1, if appropriate.

Hanford Facility RCRA Permit Modification Notification Form

Unit: Liquid Effluent Retention Facility and 200 Area Effluent Treatment Facility	Permit Part & Chapter: Part III, Chapter 4 and Attachment 34 [Chapter 5.0]
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Description of Modification:

Section 5.5, Page 5-1, lines 20-26:

5.5 DETECTION MONITORING PROGRAM [D-10e]

Interim status groundwater monitoring will be continued until a final status groundwater monitoring plan is submitted by DOE and approved by Ecology. The approved final status groundwater monitoring plan will be implemented immediately on approval and will be submitted for incorporation as a modification to the LERF permit ~~before the end of calendar year 1998~~. The ultimate goal is to develop a consolidated groundwater monitoring plan for the Hanford Site, which will supersede the LERF specific final status groundwater monitoring plan.

Modification Class: ¹²³	Class 1	Class ¹	Class 2	Class 3
Please check one of the Classes:	X			

Relevant WAC 173-303-830, Appendix I Modification: A.1.

Enter wording of the modification from WAC 173-303-830, Appendix I citation:

- A. General Permit Provisions
 1. Administrative and Informational changes.

Submitted by Co-Operator:	Reviewed by RL Program Office:	Reviewed by Ecology:
<i>J. D. Williams</i> J. D. Williams Date	<i>H. E. Bilson</i> H. E. Bilson Date	<i>R. J. Julian</i> R. J. Julian Date
3/16/99	4/6/99	6/14/99

¹Class 1 modifications requiring prior Agency approval.

² This is only an advanced notification of an intended Class ¹1, 2, or 3 modification, this should be followed with a formal modification request, and consequently implement the required Public Involvement processes when required.

³ 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 ¹1, if appropriate.

Hanford Facility RCRA Permit Modification Notification Form

Unit:
**Liquid Effluent Retention Facility and
 200 Area Effluent Treatment Facility**

Permit Part & Chapter:
**Part III, Chapter 4 and Attachment 34
 [Appendix 4A]**

Description of Modification:

Appendix 4A, Table 4A-2:

Table 4A-2. Liquid Effluent Retention Facility Piping and Instrumentation.

LERF System	Drawing Number	Outstanding ECNs	Drawing Title
Transfer Piping to 242-A Evaporator	H-2-79604, Rev. 2	None	Piping Plot and Key Plans: 242-A Evaporator Condensate Stream (Sheet 1)
LERF Piping and Instrumentation	H-2-88766, Rev. 4	ECN-049101	P&ID; LERF Basin and ETF Influent (Sheet 1)
LERF Piping and Instrumentation	H-2-88766, Rev. 4	ECN-049101	P&ID; LERF Basin and ETF Influent (Sheet 2)
LERF Piping and Instrumentation	H-2-88766, Rev. 4	ECN-049101	P&ID; LERF Basin and ETF Influent (Sheet 3)
LERF Piping and Instrumentation	H-2-88766, Rev. 2	None	P&ID; LERF Basin and ETF Influent (Sheet 4)
	H-2-89351, Rev. 3	ECN-049101	Piping & Instrumentation Diagram - Legend

Modification Class: ^{1,2,3}

Please check one of the Classes:

Class 1	Class ¹	Class 2	Class 3
X			

Relevant WAC 173-303-830, Appendix I Modification: A.1.

Enter wording of the modification from WAC 173-303-830, Appendix I citation:

A. General Permit Provisions

1. Administrative and Informational changes.

Submitted by Co-Operator:	Reviewed by RI Program Office:	Reviewed by Ecology:
<i>Benneth J. Williams</i> 3/16/99 for J. D. Williams	<i>H. E. Bilson</i> 4/6/99 H. E. Bilson	<i>R. J. Julian</i> 4/27/99 R. J. Julian
Date	Date	Date

¹Class 1 modifications requiring prior Agency approval.

² This is only an advanced notification of an intended Class ¹, 2, or 3 modification, this should be followed with a formal modification request, and consequently implement the required Public Involvement processes when required.

³ 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 ¹, if appropriate.

Hanford Facility RCRA Permit Modification Notification Form

Unit: Liquid Effluent Retention Facility and 200 Area Effluent Treatment Facility	Permit Part & Chapter: Part III, Chapter 4 and Attachment 34 [Chapter 5.0]
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Description of Modification:

Appendix 4B, Table 4B-1:

Table 4B-1. Drawing of Effluent Treatment Facility and Load-In Station Secondary Containment Systems

ETF Process Unit	Drawing Number	Outstanding ECNs	Drawing Title
Surge Tank, Process/Container Storage Areas and Trenches - Foundation and Containment	H-2-89063, Rev. 3	None	STRUCT - Foundation and Grade Beam Plan (Sheet 1)
Sump Tank Containment	H-2-89065, Rev. 3	None	STRUCT - Foundation, Sections and Detail (Sheet 1)
Verification Tank Foundation and Containment	H-2-89068, Rev. 3	None	STRUCT - Verification Tank Foundation (Sheet 1)
Load-In Facility Foundation and Containment	H-2-817970, Rev. 1	None	Structural - ETF Truck Load-in Facility Plans and Sections (Sheet 1)
Load-In Facility Foundation and Containment	H-2-817970, Rev. 1	None	Structural - ETF Truck Load-in Facility Sections and Details (Sheet 2)

Modification Class: ¹²³	Class 1	Class 1	Class 2	Class 3
Please check one of the Classes:	X			

Relevant WAC 173-303-830, Appendix I Modification: A.1.

Enter wording of the modification from WAC 173-303-830, Appendix I citation:

- A. General Permit Provisions
 1. Administrative and Informational changes.

Submitted by Co-Operator:	Reviewed by RL Program Office:	Reviewed by Ecology:
<i>J. D. Williams</i> J. D. Williams Date	<i>H. E. Bilson</i> H. E. Bilson Date	<i>R. J. Julian</i> R. J. Julian Date

¹Class 1 modifications requiring prior Agency approval.

² This is only an advanced notification of an intended Class ¹1, 2, or 3 modification, this should be followed with a formal modification request, and consequently implement the required Public Involvement processes when required.

³ 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 ¹1, if appropriate.

Hanford Facility RCRA Permit Modification Notification Form

Unit: Liquid Effluent Retention Facility and 200 Area Effluent Treatment Facility	Permit Part & Chapter: Part III, Chapter 4 and Attachment 34 [Chapter 5.0]
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Description of Modification:

Table 4B-2. Drawings of Major Process Units and Tanks at the Effluent Treatment Facility and Load-In Station.

Appendix 4B, Table 4B-2:

ETF Process Unit	Drawing Number	Outstanding ECNs	Drawing Title
Load-In Facility	H-2-817926, Rev. 1 H-2-817974, Rev. 1	None ECN 636740 ECN 636741	P&ID - ETF Truck Load-In Facility (Sheet 1)
Surge Tank	H-2-89137, Rev. 6 686510	None ECN 636740 ECN 636741	P&ID - Surge Tank System (Sheet 1)
UV/Oxidation	H-2-88976, Rev. 6	None ECN 636740 ECN 636741	P&ID - UV Oxidizer Part 1 (Sheet 1)
UV/Oxidation	H-2-89342, Rev. 6	None ECN 636740 ECN 636741	P&ID - UV Oxidizer Part 2 (Sheet 1)
Reverse Osmosis	H-2-88980, Rev. 6 686510	None	P&ID - 1st RO Stage (Sheet 1)
Reverse Osmosis	H-2-88982, Rev. 6 686510	ECN 636799 ECN 611724 None	P&ID - 2nd RO Stage (Sheet 1)
IX/Polishers	H-2-88983, Rev. 6 686510	ECN 636799 ECN 636799	P&ID - Polisher (Sheet 1)
Verification Tanks	H-2-88985, Rev. 6 686510	None	P&ID - Verification Tank System (Sheet 1)
ETF Evaporator	H-2-89335, Rev. 6 686510	None ECN 636799 ECN 636799	P&ID - Evaporator (Sheet 1)
Thin Film Dryer	H-2-88989, Rev. 6 686510	ECN 644718 ECN 636799 ECN 636799	P&ID - Thin Film Dryer (Sheet 1)
Transfer Piping from LERF to ETF	H-2-88768, Rev. 1	None	Piping Plan/Profile 4"-60M-002-M17 and 3"-60M-001-M17 (Sheet 1)
Transfer Piping from Load-In Facility to ETF	H-2-817969, Rev. 1	W291-015 ECN 644703	Civil - ETF Truck Load-In Facility Site Plan (Sheet 1)

Modification Class: ¹²³	Class 1	Class ¹	Class 2	Class 3
Please check one of the Classes:	X			

Relevant WAC 173-303-830, Appendix I Modification: A.1.

Enter wording of the modification from WAC 173-303-830, Appendix I citation:
 B. General Permit Provisions
 2. Administrative and Informational changes.

Submitted by Co-Operator:	Reviewed by RL Program Office:	Reviewed by Ecology:
<i>Kenneth J. Williams</i> J. D. Williams Date: 3/16/99	<i>Helen E. Bilson</i> H. E. Bilson Date: 4/6/99	<i>R. J. Julian</i> R. J. Julian Date: 4/27/99

¹Class 1 modifications requiring prior Agency approval.
² This is only an advanced notification of an intended Class ¹1, 2, or 3 modification, this should be followed with a formal modification request, and consequently implement the required Public Involvement processes when required.
³ 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 ¹1, if appropriate.