



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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January 6, 2005

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Office of River Protection
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P.O. Box 450, MSIN: H6-60
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Mr. Edward S. Aromi
CH2M HILL Hanford Group, Inc.
P.O. Box 1500, MSIN: H6-08
Richland, Washington 99354-1670

Dear Messrs. Schepens, Klein, and Aromi:

Re: Final Dangerous and/or Mixed Waste Research, Development, and Demonstration (RD&D) Permit for the Demonstration Bulk Vitrification Facility

Reference: Letter dated December 13, 2004, to Roy J. Schepens, Keith A. Klein, and Edward S. Aromi, from Michael Wilson, Program Manager, Nuclear Waste Program, Washington State Department of Ecology, RD&D Permit issued December 13, 2004

You received a letter and permit sent by the Washington State Department of Ecology (Ecology) December 13, 2004. Ecology has discovered errors in both the documents. The letter stated the effective date of the RD&D Permit as January 12, 2004. It should say 2005.

The following are recent errors found in the RD&D Permit that Ecology has corrected:

- 1) Permit Condition I.B.2 referred to the list of attachments as being on pages 7 and 8 of the Permit. It was changed to read pages 9 and 11.

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- 2) Permit Condition II.B.7.z. refers to Permit Attachment BB Section 6.2.3.2. It is Section 6.2.3.1. of Attachment BB.
- 3) Permit Condition III.A.1. refers to Figure 2-3 of Permit Attachment JJ. It is Figure 2-2 of Permit Attachment JJ.
- 4) Permit Condition III.G.3. The condition refers to Permit Table III.1 and "updating the engineering description" found in Column 2 of Table III.1. The description is for Column 3 of Permit Table III.1.
- 5) Permit Condition IV.A.3.i. references Permit Condition IV.A.3.i. The reference is Permit Condition IV.A.3:h.
- 6) Permit Condition V.C.1.A. refers to "set points" specified in Permit Tables V.7 and V.8. Set points are in Table V.8.
- 7) Permit Condition V.H.2.a. refers to the "feed limits" specified in Permit Tables V.7 and V.8. Currently, "feed limits" are listed only in Table V.7.
- 8) Permit Table VI-1 lists Permit Condition III.G.4. and the reference is not correct. It is III.G.4.a. through III.G.4.g.

In addition, we updated the Table of Contents to correct page numbering because new pages were added in the Permit as, "This page intentionally left blank". Enclosed are the corrected pages to be inserted in the RD& D Permit.

Ecology apologizes for these errors. If you have any questions, please call Kathy Conaway at (509) 372-7890 or Suzanne Dahl at (509) 372-7892.

Sincerely,



Michael Wilson
Program Manager
Nuclear Waste Program

cc: Joel Hebdon, USDOE
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PART I – STANDARD CONDITIONS

I.A. EFFECT OF PERMIT

The Permittees are authorized to store and treat dangerous waste in accordance with the conditions of this Permit and the applicable provisions of Chapter 173-303 WAC. Any storage or treatment of dangerous and/or mixed waste by the Permittees at this facility that is not authorized by this Permit or by WAC 173-303-809 and for which a permit is required under WAC 173-303-800 is prohibited. Issuance of this Permit does not convey any property rights of any sort or any exclusive privilege [WAC 173-303-810(8)(b)]. Issuance of this Permit does not authorize any injury to persons or property, any invasion of other private rights, or any infringement of state or local law or regulations [WAC 173-303-810(8)(c)].

I.B. GENERAL PERMIT CONDITIONS

I.B.1. The general permit conditions under WAC 173-303-810, and final facility standards under WAC 173-303 as set forth in WAC 173-303-600, are incorporated as specified in this Permit and shall be adhered to by the Permittees. The Permittees shall also comply with any self-implementing statutory provisions, which according to the requirements of state law, are automatically applicable to the Permittees' dangerous and/or mixed waste activity, notwithstanding the conditions of this Permit.

I.B.2. The attachments listed on Permit pages nine (9) through eleven (11) are incorporated by reference into this Permit. Facility operations shall be in accordance with the contents of the Permit attachments, as revised by this Permit.

I.C. PERMIT ACTIONS

I.C.1. This Permit may be modified, revoked, or terminated by Ecology for cause as specified in WAC 173-303-830(3), (4), and (5) and WAC 173-303-809. The filing of a request for a permit modification, revocation and reissuance, or termination, or the notification of planned changes or anticipated noncompliance on the part of the Permittees shall not stay the applicability or enforceability of any condition [WAC 173-303-810(7)].

I.C.2. Permittee Initiated Modifications

Permit modifications pursuant to this Permit for dangerous and/or mixed waste, at the request of the Permittees, must be done according to the three-tiered modification system specified in WAC 173-303-830(4) and Condition I.C.3. The permit modification request must include page changes to the Permit, attachments, and Permit Application supporting documentation necessary to incorporate the proposed permit modification and a draft with changes clearly noted in red-line strikeout to Ecology for review and approval.

- II.B.7.v. Section 6, page 6-13, Figure 6-1, the block entitled "Solid Secondary Waste," the narrative under "Purpose of Waste Sampling" is amended to include the following: "and provide mass balance information."
- II.B.7.w. Section 6, page 6-13, Figure 6-1, the block entitled "Solid Secondary Waste," the narrative under "Sampling Point, Sampling Method, and Sampling Frequency" is revised as follows: "Meet the Waste Acceptance Criteria of a Disposal Facility."
- II.B.7.x. Section 6, page 6-13, Figure 6-1, the block entitled "Solid Secondary Waste," the narrative under "Analytical Methods Will Measure" is amended to include the following: "Appendix D of the Permit Application; Permit Attachment BB for mass balance information."
- II.B.7.y. Section 6, page 6-13, Figure 6-1, under "Assumptions," revise third bullet as follows: "Waste Analysis for compliance with WAC 173-303-395 will be determined pursuant to the RD&D Permit issued by Ecology."
- II.B.7.z. Section 6.2.3.1, page 6-4, Table 6-3, add D004 through D011 constituents to table, HLVT LDR Treatment Standard for D004 through D011, footnote "3" to sulfates and organic carbon, and a parenthesis before the word "Land" in the title of the third column.
- II.B.8. Prior to the initial receipt of dangerous and/or mixed waste in the DBVS Facility, Permittees shall submit and receive written approval from Ecology for the following revisions of Permit Attachment BB. Such approval shall not require a permit modification under Permit Conditions I.C.2. and I.C.3.:
- II.B.8.a. Amend the sampling, analysis, and QA/QC procedures to address any sumps that are part of secondary containment systems for the DBVS Facility storage and treatment units.
- II.B.8.b. Amend to include, "Sampling and analysis for those others and QA/QC procedures and sampling frequency for the parameters identified in Section 6.2.3.4, 1 through 3, and in Table 6-2 for Phase 1."
- II.B.8.c. Amend to include an Appendix specifying limitations for the ICV® packages addressing at a minimum the following:
- II.B.8.c.i. Size, durability, compressibility, stacking, handling, retrievability from storage and after final disposal, outside and inside package residual contamination, and disposal facility testing/acceptance requirements.
- II.B.8.d. Prior to the initial receipt of dangerous and/or mixed waste in the DBVS Facility, the Permittees shall submit to Ecology for approval, and strictly for this RD&D Permit, documentation not based solely on process knowledge, that shows the removal of the characteristic codes D001 and D003 from S-109 tank waste.

PART III – CONTAINERS

For purposes of Permit Part III, all references to Permit Attachment JJ shall be read as references to Permit Attachment JJ, as revised pursuant to Permit Condition III.G.

III.A. CONTAINER MANAGEMENT AREAS AND ACCUMULATION LIMITS

- III.A.1. The Permittees shall place or store dangerous and/or mixed waste ICV® Packages in the areas identified in Figure 2-2 of Permit Attachment JJ and Permit Table III.1.
- III.A.2. Any dangerous and/or mixed waste generated and managed in containers by the facility shall be managed in accordance with the generator requirements in WAC 173-303-200.
- III.A.3. For the purpose of determining compliance with storage capacity limits, every ICV® Package shall be considered to be full.
- III.A.4. The Permittees may store dangerous and/or mixed waste ICV® Packages with the waste codes listed in Table 6-1, excluding characteristic code D001 and D003 of Permit Attachment BB, in accordance with Permit Attachment BB, as changed pursuant to Permit Conditions II.B.7. and II.B.8. Total containerized dangerous and/or mixed waste storage at the DBVS Facility shall not exceed capacity specified on Permit Table III.1.
- III.A.5. The Permittees may place and store dangerous and/or mixed waste only in approved container storage areas listed in Permit Table III.1. The Permittees shall limit the total volume of waste to quantities specified for the individual container storage areas listed in Permit Table III.1.
- III.A.6. The Permittees are not authorized to store free liquids in any of the approved container storage areas listed in Permit Table III.1.
- III.A.7. The Permittees shall maintain documentation in the operating record for each container storage area listed in Permit Table III.1. in accordance with WAC 173-303-380 and 173-303-210.

III.B. CONTAINER STORAGE AREAS DESIGN AND CONSTRUCTION

- III.B.1. The Permittees shall construct container storage areas identified in Permit Table III.1., as specified in all applicable drawings and specifications in Permit Attachment JJ and Permit Part III.
- III.B.2. All container storage areas identified in Permit Table III.1. must be constructed in accordance with WAC 173-303-630(7)(c).

III.G. COMPLIANCE SCHEDULES

- III.G.1. All information identified for submittal to Ecology in Permit Conditions III.G.2. through III.G.4. of this compliance schedule must be signed and certified in accordance with the requirements in WAC 173-303-810(12) and (13).
- III.G.2. Prior to construction of the DBVS Facility container storage area, as identified in Permit Table III.1., the Permittees shall submit and receive written approval from Ecology for engineering information as specified below, for incorporation into Permit Attachment JJ. Such approval shall not require a permit modification under Permit Conditions I.C.2. and I.C.3.:
- III.G.2.a. Design drawings (General Arrangement Drawings - in plan and cross sections) and specifications including references to specific codes and standards (e.g., UBC, ASCE, etc.) for each container storage areas' foundation. These items should show basic design parameters and dimensions, and location of the container storage areas, to keep containers from contact with standing liquids (i.e., elevated or are otherwise protected).
- III.G.3. Prior to initial receipt of dangerous and/or mixed waste to the DBVS Facility, the Permittees shall submit and receive written approval from Ecology for Permit Table III.1., updated to include the contents of Column 3 "Engineering Description" to reflect the engineering information provided under III.G.2.a. Such approval shall not require a permit modification under Permit Conditions I.C.2. and I.C.3.
- III.G.4. Prior to initial receipt of dangerous and/or mixed waste to the DBVS Facility, the Permittees shall update and submit and receive written approval from Ecology for the following, as specified below, for incorporation into Permit Attachment JJ. Such approval shall not require a permit modification under Permit Conditions I.C.2. and I.C.3.:
- III.G.4.a. Narrative Descriptions, updated;
- III.G.4.b. Descriptions of procedures for precluding release of contents of ICV® Package to the environment during the ICV® Package disconnect and sampling the ICV® Package including, but not limited, to the following:
- III.G.4.b.i. Sealing the sampling port;
- III.G.4.b.ii. Coring process;
- III.G.4.b.iii. External decontamination; and
- III.G.4.b.iv. ICV® Package disconnect procedures;

- IV.A.3.g.iv. Hydro-test reports, as applicable, in accordance with the American Society of Mechanical Engineers Boiler and Pressure Vessel Code, Section VIII, Division 1, American Petroleum Institute (API) Standard 620, or Standard 650, as applicable;
- IV.A.3.g.v. Tester credentials;
- IV.A.3.g.vi. Field inspector credentials;
- IV.A.3.g.vii. Field inspector reports;
- IV.A.3.g.viii. Field waiver reports; and
- IV.A.3.g.ix. Non-compliance reports and corrective action (including field waiver reports) and repair reports.
- IV.A.3.h. The Permittees shall ensure periodic integrity assessments are conducted on the DBVS Facility tank systems listed in Permit Table IV.1. over the term of this Permit as specified in WAC 173-303-640(3)(b), following the description of the integrity assessment program Permit Attachment II, as revised pursuant to Permit Condition II.D.2.
- IV.A.3.i. The Permittees shall address problems detected during the DBVS Facility tank system integrity assessments specified in Permit Condition IV.A.3.h., following the integrity assessment program in Permit Attachment II, as revised pursuant to Permit Condition II.D.2.
- IV.A.3.j. The Permittees must immediately and safely remove from service any DBVS Facility tank system or secondary containment system which through an integrity assessment is found to be "unfit for use" as defined in WAC 173-303-040, following Permit Condition IV.A.4.h.v. The affected tank system or secondary containment system must be either repaired or closed in accordance with Permit Condition IV.A.4.h.v. [WAC 173-303-640(7)(e) and (f) and WAC 173-303-640(8)].
- IV.A.3.k. The Permittees must provide the type and degree of corrosion protection recommended by an independent corrosion expert, based on the information provided in Permit Attachments BB, as revised pursuant to Permit Conditions II.B.7. and II.B.8., and Permit Attachments FF and KK, as revised pursuant to Permit Condition IV.A.8., or other corrosion protection, if Ecology believes other corrosion protection is necessary to ensure the integrity of the tank system during its use. The installation of a corrosion protection system that is field fabricated must be supervised by an independent corrosion expert to ensure proper installation [WAC 173-303-640(3)(g)].
- IV.A.4. TANK MANAGEMENT PRACTICES

those persons required to certify the design of the DBVS and supervise the installation of the DBVS, as specified in WAC 173-303-640(3)(b), (c), (d), (e), (f), and (g), in accordance with WAC 173-303-680, attesting that the DBVS and corresponding containment system listed in Permit Tables V.2. and V.5., were properly designed and installed, and that repairs, in accordance with WAC 173-303-640(3)(c) and (e) were performed [WAC 173-303-640(3)(a) and WAC 173-303-640(3)(h), in accordance with WAC 173-303-680(3)].

V.B. PERFORMANCE STANDARDS

The Permittees shall provide information supporting DBVS targeted and actual performance in the DBVS Campaign Plans and DBVS Campaign Summary Reports, respectively, as specified in Permit Conditions V.I.6., V.I.7., V.I.8., V.I.9., and V.I.10.

V.C. OPERATING CONDITIONS

[WAC-303-670(6), in accordance with WAC 173-303-680(2) and (3)].

V.C.1. The Permittees shall operate the DBVS in accordance with Permit Attachment LL, Permit Part V., and in accordance with the following:

V.C.1.a. The Permittees shall operate the DBVS in order to maintain the systems and process parameters listed in Permit Tables V.3., V.6., V.7., and V.8., within the set-points specified in Permit Table V.8.

V.C.1.b. The Permittees shall operate the Emergency Parameter Control/Response System, specified in Permit Table V.8., to respond (e.g., automatically cut-off and/or lock-out the dangerous and mixed waste feed to the DBVS, etc.) as specified in Permit Table V.8. when the operating conditions exceed the set-points specified in Permit Table V.8.

V.C.1.c. The Permittees shall operate the Emergency Parameter Control/Response System, specified in Permit Table V.8., to respond (e.g., automatically cut-off and/or lock-out the dangerous and mixed waste feed to the DBVS, etc.) as specified in Permit Table V.8. when any instrument or component specified on Permit Tables V.7. and V.8. for setting or measuring the monitored parameter fail or operate outside its span value.

V.C.1.d. The Permittees shall operate the Emergency Parameter Control/Response System, specified in Permit Table V.8. to respond (e.g., automatically cut-off and/or lock-out the dangerous and mixed waste feed to the DBVS, etc.) as specified in Permit Table V.8. when any portion of the DBVS that is specified for operation in the Ecology Approved DBVS Campaign Plan pursuant to Permit Conditions V.I.6. and V.I.7. is bypassed. The terms "bypassed" and "bypass event" as used in Permit Part V. shall mean if any portion of the DBVS is bypassed so that gases are not treated

- V.E.1. The Permittees shall comply with the monitoring requirements specified in Permit Attachment LL, Ecology approved DBVS Campaign Plan, and Permit Part V.
- V.E.2. The Permittees shall operate, calibrate, and maintain the carbon monoxide (CO), nitrogen oxides (NOx), sulfur oxides (SOx), particulate emission, and organic monitors, and any other monitors required for the DBVS by the Ecology approved DBVS Campaign Plan in accordance with the EPA Performance Specifications in 40 CFR Part 60, Appendix B, as specified in Attachment LL of this Permit, the Ecology approved DBVS Campaign Plan, and Part V. of this Permit.
- V.E.3. The Permittees shall operate, calibrate, and maintain the instruments specified on Permit Tables V.3., V.6., and V.8., in accordance with Attachment LL of this Permit, the Ecology approved DBVS Campaign Plan, and Part V. of this Permit.
- V.F. RECORDKEEPING REQUIREMENTS
[WAC 173-303-380 and WAC 173-303-680(3)].
- V.F.1. The Permittees shall record and maintain in the operating record for the DBVS, all monitoring, calibration, maintenance, test data, and inspection data compiled under the conditions of this Permit, in accordance with Permit Conditions II.D., and II.G.
- V.F.2. The Permittees shall record in the DBVS operating record the date, time, and duration of Emergency Parameter Control/Response System activation (e.g., automatic waste feed cutoffs and/or lockouts, etc.) including the triggering parameters, reason for the deviation, and recurrence of the incident. The Permittees shall also record all incidents of the Emergency Parameter Control/Response System function failures, including the corrective measures taken to correct the condition that caused the failure.
- V.G. CLOSURE
- The Permittees shall close the DBVS System in accordance with Permit Condition II.H., as revised pursuant to Permit Condition II.H.9.
- V.H. PHASE 1 AND PHASE 2 CAMPAIGNS
[WAC 173-303-670(5), (6), and (7), and WAC 173-303-807(2), in accordance with WAC 173-303-680(2) and (3)].
- V.H.1. The Permittees shall conduct Phase 1 and Phase 2 in accordance with Permit Attachment LL, Ecology approved DBVS Campaign Plan and Permit Part V.
- V.H.2. Phase 1 and Phase 2 Limitations and Allowable Waste Feed
- V.H.2.a. The Permittees shall comply with the Phase 1 and Phase 2 feed limits specified on Permit Table V.7, Permit Conditions II.A. and II.B., the Ecology approved DBVS

Campaign Plan pursuant to Permit Conditions V.I.6., V.I.7., and V.I.8., and Permit Attachment BB, as changed pursuant to Permit Conditions II.B.7. and II.B.8., and amended to exclude feed of D001 and D003.

- V.H.3. The Permittees shall not commence Phase 1 until the Permittees have submitted and received Ecology approval for the Phase 1 DBVS Campaign Plan pursuant to Permit Condition V.I.6.
- V.H.4. The Permittees shall not commence the first campaign under Phase 2 until the following has occurred:
- V.H.4.a. The Permittees have submitted the portions of the Phase 1 DBVS Campaign Summary Report to Ecology, as specified in Permit Condition V.I.9., that were identified in DBVS Phase 1 Campaign Plan, as approved by Ecology, as critical to development of the first campaign under Phase 2's DBVS Campaign Plan.
- V.H.4.b. The Permittees have submitted and received Ecology approval for the first Phase 2 DBVS Campaign Plan pursuant to Permit Condition V.I.7.
- V.H.5. The Permittees shall not commence each subsequent campaign under Phase 2 until the following has occurred:
- V.H.5.a. The Permittees have submitted the portions of the previous Phase 2 DBVS Campaign Summary Report(s) to Ecology, as specified in Permit Condition V.I.9., that were identified in the previous DBVS Phase 2 Campaign Plan(s), as approved by Ecology, as critical to development of this subsequent DBVS Phase 2 Campaign Plan.
- V.H.5.b. The Permittees have submitted and received Ecology approval for the DBVS Campaign Plan under Phase 2, which the Permittees are requesting approval to commence pursuant to Permit Conditions V.I.7. and/or V.I.8.

V.I. COMPLIANCE SCHEDULES

- V.I.1. All information identified for submittal to Ecology in V.I.2. through V.I.5. and in V.I.10. of this compliance schedule must be signed and certified in accordance with requirements in WAC 173-303-810(12).
- V.I.2. Prior to construction of each secondary containment and leak detection system for the DBVS as identified in Permit Tables V.2. and V.5., the Permittees shall submit and receive Ecology approval for the engineering information as specified below, for incorporation into Permit Attachment LL. At a minimum, engineering information specified below will show the following as described in WAC 173-303-640, in accordance with WAC 173-303-680 (the information specified below will include dimensioned engineering drawings and information on sumps and floor

Reference	Required Submission	Date or Event
II.H.9.	The Permittees shall update and resubmit and receive written approval from Ecology for the Closure Plan, Permit Attachment EE, to be consistent with design details and schedule described in Permit Attachments JJ, KK, and LL. The updated Closure Plan, Permit Attachment EE, must be consistent with the closure performance standards specified in WAC 173-303-610(2).	Prior to initial receipt of dangerous and/or mixed waste in DBVS Facility.
II.H.10.	The Permittee shall submit the revised page reflecting the amendment in II.H.10. of this Permit to Ecology.	Prior to initial receipt of dangerous and/or mixed waste in DBVS Facility.
II.I.	The Permittees must submit documentation of a substitution of an equivalent or superior equipment, materials and/or administrative information, accompanied by a narrative explanation and the date the substitution became effective.	Place in the operating record and submit to Ecology within seven days of putting the substitution into effect.
PART III – CONTAINER MANAGEMENT PRACTICES		
III.G.2.	The Permittees shall submit and receive written approval from Ecology for engineering information as specified in III.G.2.a. of this Permit for incorporation into Attachment JJ.	Prior to construction of the DBVS Facility container storage area.
III.G.3.	The Permittees shall submit and receive written approval from Ecology for Permit Table III.1. updated to include the contents of Column 2 “Engineering Description,” to reflect the engineering information provided under III.G.2.a. of this Permit.	Prior to initial receipt of dangerous and/or mixed waste to the DBVS Facility.
III.G.4.	The Permittees shall update and submit and receive written approval from Ecology for the following, as specified in Permit Conditions III.G.4.a. through III.G.4.g., for incorporation into Permit Attachment JJ.	Prior to initial receipt of dangerous and/or mixed waste to the DBVS Facility.