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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

3100 Port of Benton Blvd • Richland, WA 99352 • (509) 372-7950

May 5, 2005

RECEIVED
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EDMC

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

Mr. Keith A. Klein, Manager
Richland Operations Office
United States Department of Energy
P.O. Box 550, MSIN: A7-50
Richland, Washington 99352

Mr. Joel B. Hebdon, Director
Regulatory Compliance and Analysis Division
United States Department of Energy
P.O. Box 550, MSIN: A5-15
Richland, Washington 99352

Mr. Roby D. Enge, Director
Environment, Safety, Health and Quality
Pacific Northwest National Laboratory
P.O. Box 999, MSIN: J2-05
Richland, Washington 99352

Mr. Richard H. Gurske, Director
Environmental Protection
Fluor Hanford, Inc.
P.O. Box 1000, MSIN: H8-12
Richland, Washington 99352

Mr. Thomas E. Logan, President
Bechtel Hanford, Inc.
3070 George Washington Way, MSIN: H0-30
Richland, Washington 99352

Mr. J.P. Henschel, Project Director
Bechtel National, Inc.
2435 Stevens Center Place
Richland, Washington 99352

Ms. Susan J. Eberlein, Vice President
Environmental Safety, Health, and Quality
CH2M Hill Hanford Group, Inc.
P.O. Box 1500, MSIN: H6-03
Richland, Washington 99352

Dear Ms. Eberlein and Messrs. Schepens, Hebdon, Gurske, Henschel, Klein, Enge, and Logan:

Re: United States Department of Energy Letter Dated January 10, 2005, "Quarterly Notification of Class 1 Modifications to the Hanford Facility Resource Conservation and Recovery Act (RCRA) Permit (Quarter ending December, 2004)

Enclosed are Modification Notification Forms indicating those modifications that the Washington State Department of Ecology (Ecology) has reviewed and approved or denied for the referenced quarterly Class 1 Modifications.

Ms. Eberlein and Messrs. Schepens, Hebdon, Gurske, Henschel, Klein, Enge, and Logan
May 5, 2005
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The approved/denied quarterly modifications include:

300 Area Waste Acid Treatment System, Part IV, Chapter 20:
Hanford Facility RCRA Permit, Chapter 20, V.20.A Approved

Liquid Effluent Retention Facility & 200 Area Effluent Treatment Facility, Attachment 34:
Chapter 4.0, Section 4.2.1 Approved

The United States Department of Energy and contractor staff are encouraged to discuss proposed Class 1 changes with Ecology's unit managers to clarify any questions or concerns. If you have any questions or comments regarding this letter, please contact me at (509) 372-7894.

Sincerely,



Greta P. Davis
Hanford Sitewide RCRA Permit Coordinator
Nuclear Waste Program

GD:nc
Enclosures

cc/enc: Tony McKarns, USDOE
 John Swailes, USDOE
 Suzette Thompson, FH
 Stuart Harris, CTUIR
 Russell Jim, YN
 Pat Sobotta, NPT
 Ken Niles, ODOE
 Administrative Record, HF RCRA Permit
 Environmental Portal

cc: Ro Vinson, PAC
 Todd Martin, HAB

Hanford Facility RCRA Permit Modification Notification Forms

**Part IV, Chapter 20
300 Area Waste Acid Treatment System**

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Page 2 of 2: Hanford Facility RCRA Permit, Chapter 20, V.20.A

Submitted by Co-Operator:

T. E. Logan
T. E. Logan

12/21/04

Date

Reviewed by RL Program Office:

L. Erickson
L. Erickson

1/5/05

Date

Hanford Facility RCRA Permit Modification Notification Form														
Unit: Part IV, Chapter 20	Permit Part & Chapter: 300 Area Waste Acid Treatment System													
<p><u>Description of Modification:</u> Hanford Facility RCRA Permit, Chapter 20, V.20.A</p> <p style="text-align: center;">CHAPTER 20</p> <p style="text-align: center;">300 Area Waste Acid Treatment System (Partial Closure Plan Completed, December 3, 2001)</p> <p>The 300 Area Waste Acid Treatment System (300 WATS) was a tank system that was used to treat and store nonrecoverable uranium-bearing waste acid from reactor fuel fabrication operations. Waste acid neutralization occurred in portions of what now is the 300 Area WATS before operation of the system as a <i>Resource Conservation and Recovery Act (RCRA) of 1976</i> unit. The Closure Plan detailed closure of 300 Area WATS components, areas, and contamination resulting from RCRA operations. This unit consisted of portions of four (4) buildings and two (2) tank farms: 334-A Building, 313 Building, 303-F Building, 333 Building, 334 (tank 4), and 311 Tank Farms (tanks 40 and 50).</p> <p>Closure activities were completed in September 1999, in accordance with the approved Closure Plan contained in Attachment 46 that was retired during Revision 6 of this Permit. Clean closure was given for structures above the ground using the visually verifiable 'clean debris surface' rule and table in the <i>Ecology Guidance for Clean Closure of Dangerous Waste Facilities Publication #94-111</i> (August, 1994). The disposition of unclosed 300 Area WATS soils will be performed in conjunction with the 300-FF-2 CERCLA OU remedial action to complete WATS RCRA closure.</p> <p>V.20.A. The Permittees shall comply with all requirements listed below following partial closure:</p> <p>V.20.A.1 Part A Dangerous Waste Permit, Revision 5A6</p> <p>V.20.A.2 Soil Contamination Areas 1 and 2, identified in the Part A, Form 3, Revision 6SA, shall be inspected annually to ensure that the contamination at these locations remains immobilized until final disposition. Soil over the concrete WATS and U-Bearing Piping Trench that covers Soil Contamination Area 1 will be inspected annually for disturbance indicating a potential for contamination at this area to become mobilized. The concrete surface over Soil contamination Area 2, located inside the 313 Building, will be inspected annually for cracks or major degradation and the presence of water that could mobilize soil contamination at this location. If unsatisfactory conditions are identified during annual inspections, Ecology will be notified for discussion of an appropriate response. This condition constitutes the TSD unit's inspection schedule.</p> <p>V.20.A.3 A contingency plan, personnel training plan, or a waste analysis plan will not be required for the 300 Area WATS following partial closure.</p>														
<table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td style="width: 55%; padding: 5px;">WAC 173-303-830 Modification Class ¹²</td> <td style="width: 10%; padding: 5px;">Class 1</td> <td style="width: 10%; padding: 5px;">Class '1</td> <td style="width: 10%; padding: 5px;">Class 2</td> <td style="width: 10%; padding: 5px;">Class 3</td> </tr> <tr> <td style="padding: 5px;">Please mark the Modification Class:</td> <td style="text-align: center; padding: 5px;"><input type="checkbox"/></td> </tr> </table>					WAC 173-303-830 Modification Class ¹²	Class 1	Class '1	Class 2	Class 3	Please mark the Modification Class:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
WAC 173-303-830 Modification Class ¹²	Class 1	Class '1	Class 2	Class 3										
Please mark the Modification Class:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>										
<p>Enter relevant WAC 173-303-830, Appendix I Modification citation number:</p> <p>Enter wording of WAC 173-303-830, Appendix I Modification citation:</p>														
<p>Modification Approved: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No (state reason for denial)</p> <p>Reason for denial:</p>			<p>Reviewed by Ecology:</p> <p style="text-align: center;"><i>G. P. Davis</i> 1/21/05</p> <p style="text-align: center;">G. P. Davis Date</p>											

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 appropriate.

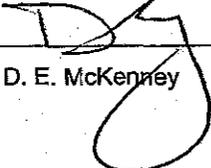
Hanford Facility RCRA Permit Modification Notification Forms

**Part III, Chapter 4 and Attachment 34
Liquid Effluent Retention Facility and 200 Area Effluent Treatment Facility**

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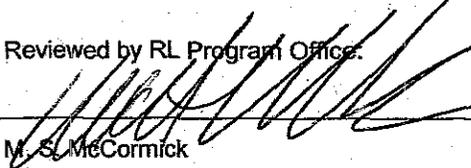
Page 2 of 2: Chapter 4.0, §4.2.1

Submitted by Co-Operator:


D. E. McKenney

11/17/04
Date

Reviewed by RL Program Office:


M. S. McCormick
RDH

11/18/04
Date

Hanford Facility RCRA Permit Modification Notification Form

Unit: Part III, Chapter 4 and Attachment 34	Permit Part & Chapter: LERF & 200 Area ETF
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Description of Modification:

Chapter 4.0, §4.2.1: Replace Chapter 4.0 with the attached Chapter 4.0.

4.2.1 Load In Station

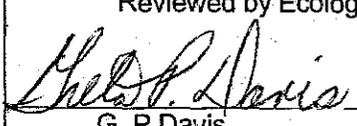
The ETF receives aqueous waste from LERF or the Load-In Station. The ETF Load-In Station, located due east of the surge tank and outside of the perimeter fence (Figure 4.4), was designed and constructed to provide the capability to unload, store, and transfer aqueous waste to the ETF or LERF from tanker trucks and other containers (such as drums). The Load-In Station consists of two truck bays equipped with load-in tanks, transfer pumps, filtration system, level instrumentation for tanker trucks, leak detection capabilities for the containment basin and transfer line, and an underground transfer line that connects to lines in the surge tank berm, allowing transfers to either the ETF surge tank or LERF. The Load-In Station is covered with a steel building for weather protection. Tanker trucks and other containers are used to unload aqueous waste at the Load-In Station. To perform unloading, the tanker truck is positioned on a truck pad, a 'load-in' transfer line is connected to the truck, and the tanker contents are pumped into one of the Load-In Station tanks, the surge tank, or directly to the LERF. For container unloading, the container is placed on the truck pad and the container contents are pumped into one of the Load-In Station tanks, the surge tank, or directly to the LERF.

During unloading operations, solids may be removed from the waste by pumping the contents of the tanker truck or container through a filtration system. If solids removal is not needed, the filtration system is not used and the solution is transferred directly to the Load-In Station tanks, surge tank, or to LERF.

Any leaks at the Load-In Station drain to the sump. A leak detector in the sump alarms locally and in the ETF control room. Alternatively, leaks can be visually detected.

WAC 173-303-830 Modification Class ^{1 2}	Class 1	Class '1	Class 2	Class 3
Please mark the Modification Class:		X		

Enter relevant WAC 173-303-830, Appendix I Modification citation number: (d) Other modifications.
Request a determination that the modification be reviewed and approved as a Class '1' modification.

Modification Approved: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No (state reason for denial) Reason for denial:	Reviewed by Ecology:  G. P. Davis 11/18/04 Date
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