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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

3100 Port of Benton Blvd • Richland, WA 99354 • (509) 372-7950

July 28, 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

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-LAW-PCN-ENV-06-008; Class ¹ 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 ¹ Modification submitted June 26, 2008.
The approved Hanford Facility RCRA Permit Modification Notification Form is enclosed.

Modification 24590-LAW-PCN-ENV-06-008 provides the updated Integrity Assessment Report
(CCN: 139510/AREVA-IA-103) for the Low Activity Waste (LAW) Primary Offgas Process
System (LOP) vessels (LOP-VSL-00001/2) and miscellaneous treatment units (LOP-SCB-
00001/2, LOP-WESP-00001/2). This replaces the current permit LAW LOP Integrity
Assessment Report in Appendix 9.11.

If there are any questions, contact me at 509-372-7882 or Tracy Gao at 509-372-7901.

Sincerely,

Brenda Becker-Khaleel
WTP Permit Writer
Nuclear Waste Program

aah/jc
Enclosure

cc: See next page

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Ms. Olinger and Mr. Elkins
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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

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Quarter Ending June 30, 2008

24590-LAW-PCN-ENV-06-008

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

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Page 2 of 3: Hanford Facility RCRA Permit, Part III, Operating Unit 10, Waste Treatment and Immobilization Plant
Update the Structural Integrity Assessment of Low-Activity Waste (LAW) Primary Offgas Process System (LOP) Plant Items (LOP-VSL-00001/2), (LOP-SCB-00001/2), and (LOP-WESP-00001/2) located in Appendix 9.11 of the WTP Dangerous Waste Permit.

Submitted by Co-Operator:

D. A. Klein
D. A. Klein

5/21/08
Date

Reviewed by ORP Program Office:

S. J. Olinger
S. J. Olinger

6/18/08
Date

Quarter Ending June 30, 2008

24590-LAW-PCN-ENV-06-008

Hanford Facility RCRA Permit Modification Notification Form

Unit:

Permit Part & Chapter:

Waste Treatment and Immobilization Plant**Part III, Operating Unit 10**Description of Modification:

The purpose of this Class 1 prime modification is to update the Integrity Assessment Report for the LAW LOP vessels and miscellaneous treatment units (MTUs) located at Elevation 2'-0". The following document is submitted to replace and consolidate two documents currently in Appendix 9.11.

Appendix 9.11

Replace:	24590-CM-HC4-HXYG-00138-01-00019, and 24590-CM-HC4-HXYG-00138-02-00011	With:	CCN: 139510 / AREVA-IA-103
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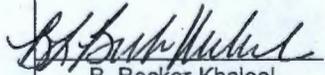
This modification requests Washington State Department of Ecology (Ecology) approval and incorporation into the permit the above mentioned integrity assessment report. The report has been updated by the Independent Qualified Registered Professional Engineer (IQRPE). The report reflects the IQRPE's review of the following final design documents:

- Material Requisitions, Engineering Specifications, Facility and Vendor Fabrication Drawings, Mechanical Data Sheets, Material Selection Data Sheets, System Descriptions, and Design Calculations produced in accordance with References:
 - ASME Boiler and Pressure Vessel Code (BPV), Section VIII, Division 1, Rules for Construction of Pressure Vessels, American Society of Mechanical Engineers
 - ASME Boiler and Pressure Vessel Code (BPV), Section VIII, Division 2, Rules for Construction of Pressure Vessels, American Society of Mechanical Engineers
 - UBC 1997, Uniform Building Code, International Conference of Building Officials
- 24590-WTP-DB-ENG-01-001, Rev. 1I, WTP Basis of Design
- 24590-WTP-PER-PR-03-001, Rev. 1, Prevention of Hydrogen Accumulation in WTP Tank Systems and Miscellaneous Treatment Units
- 24590-WTP-PER-PR-03-002, Rev. 3, Toxic Vapors and Emissions from WTP Tank Systems and Miscellaneous Treatment Units
- 24590-QL-POB-MVA0-00002-03-01, Rev. 00E, Design Calculations for LOP-VSL-00001
- 24590-QL-POB-MVA0-00002-03-09, Rev. 00C, Design Calculations for LOP-VSL-00001
- 24590-QL-POB-MVA0-00002-03-11, Rev. 00C, Design Calculations for LOP-VSL-00001
- 24590-QL-POB-MVA0-00002-03-02, Rev. 00E, Design Calculations for LOP-VSL-00002
- 24590-QL-POB-MVA0-00002-03-10, Rev. 00C, Design Calculations for LOP-VSL-00002
- 24590-QL-POB-MVA0-00002-03-12, Rev. 00C, Design Calculations for LOP-VSL-00002
- 24590-QL-POA-MKAS-00001-01-03, Rev. 00C, Design Calculations for LOP-SCB-00001/2
- 24590-QL-POA-MKAS-00001-01-16, Rev. 00C, Design Calculations for LOP-SCB-00001/2
- 24590-QL-POA-MKAS-00001-01-17, Rev. 00C, Design Calculations for LOP-SCB-00001/2
- 24590-QL-POA-MKAS-00001-01-18, Rev. 00C, Design Calculations for LOP-SCB-00001/2
- 24590-QL-POA-MKE0-00001-07-01, Rev. 00D, Design Calculations for LOP-WESP-00002
- 24590-QL-POA-MKE0-00001-07-02, Rev. 00D, Design Calculations for LOP-WESP-00001
- 24590-QL-POA-MKE0-00001-07-03, Rev. 00H, Design Calculations for LOP-WESP-00001/2
- 24590-QL-POA-MKE0-00001-07-12, Rev. 00A, Design Calculations for LOP-WESP-00001/2

For each item of "Information Assessed" in the integrity assessment report, the items listed under the "Source of Information" column were reviewed and found to furnish adequate design controls and requirements to ensure the design fully satisfies the requirements of Washington Administrative Code, WAC-173-303-640, *Dangerous Waste Regulations*.

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24590-LAW-PCN-ENV-06-008

WAC 173-303-830 Modification Class: ^{1 2} Please mark the Modification Class:	Class 1	Class ¹ 1	Class 2	Class 3
		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 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) Reason for denial:	Reviewed by Ecology: <div style="text-align: right; margin-top: 10px;">  B. Becker-Khaleel </div> <div style="text-align: right; margin-top: 5px;"> 7/28/08 Date </div>			

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.