



STATE OF WASHINGTON  
**DEPARTMENT OF ECOLOGY**

3100 Port of Benton Blvd • Richland, WA 99354 • (509) 372-7950  
711 for Washington Relay Service • Persons with a speech disability can call (877) 833-6341

**COVERSHEET**

For Letter 20-NWP-173  
Dated November 16 2020

Re: Final Class 3 Permit Modification 8C.2020.10F to the *Hanford Facility Resource Conservation and Recovery Act Permit, Dangerous Waste Portion, Revision 8C, for the Treatment, Storage, and Disposal of Dangerous Waste, Part III, Operating Unit Group 14, Waste Encapsulation and Storage Facility (WESF), WA7890008967*

Due to the Governor's "Safe Start" Order, Ecology cannot distribute hard copy letters or enclosures, including DVDs, at this time. All letters are being sent electronically with embedded links to the enclosures.

The enclosures are located at the Ecology website  
<https://fortress.wa.gov/ecy/nwp/permitting/8C.2020.10F/>.

After the Order is lifted, Ecology will send all hard copy letters and associated hard copy enclosures or DVDs as appropriate.



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November 16, 2020

20-NWP-173

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Re: Final Class 3 Permit Modification 8C.2020.10F to the *Hanford Facility Resource Conservation and Recovery Act Permit, Dangerous Waste Portion, Revision 8C, for the Treatment, Storage, and Disposal of Dangerous Waste, Part III, Operating Unit Group 14, Waste Encapsulation and Storage Facility (WESF), WA7890008967*

References: See page 3

Dear Addressees:

This letter issues the Department of Ecology's (Ecology) final permit decision on the draft 8C.2018.2D permit modification (References 1 and 2), now issued as the final 8C.2020.10F permit modification.

Ecology incorporated the final 8C.2020.10F permit modification for the WESF. In accordance with Washington Administrative Code (WAC) 173-303-840(8)(b), the addition of this Operating Unit Group (OUG) into the Site-wide Permit is effective December 16, 2020.

The purpose of this Class 3 Permit Modification is to incorporate the WESF, OUG 14, into the Site-wide Permit and authorize facility modifications needed to transfer cesium and strontium capsules from the WESF to Capsule Interim Storage, OUG 19.

As required by WAC 173-303-840(3)(d), Ecology held a 45-day public comment period that ran from August 3 through September 18, 2020. During the public comment period Ecology received a request from a member of the public to extend the public comment period. We granted that request and extended the public comment period through September 30, 2020. Ecology received 39 public comments during the public comment period.

Ecology reviewed the comments, and a *Response to Comments* document is on the enclosed DVD (Ecology Publication 20-05-026) and on Ecology's publication website at <https://fortress.wa.gov/ecy/publications/SummaryPages/2005026.html>.

The permit modification can be accessed at the Ecology website:  
<https://fortress.wa.gov/ecy/nwp/permitting/8C.2020.10F/>.

The permit modification is also on the enclosed DVD. A DVD is located at the Hanford Public Information Repositories in Richland, Spokane, and Seattle, Washington, as well as Portland, Oregon. A hard copy and DVD is on file at the locations listed below:

Department of Ecology Nuclear Waste Program 3100 Port of Benton Boulevard Richland, Washington 99354	United States Department of Energy Administrative Record 2440 Stevens Center Place Richland, Washington 99354
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Individuals can request copies of the DVD and hard copies by contacting Ecology's Resource Center at (509) 372-7950.

In accordance with WAC 173-303-830(4)(f)(ii), Ecology's decision to grant or deny a Class 3 Permit Modification request under this section may be appealed under the permit appeal procedures of WAC 173-303-845.

### **Your Right to Appeal**

You have a right to appeal this permit modification to the Pollution Control Hearings Board (PCHB) within 30 days of the date of receipt of this Permit. The appeal process is governed by Chapter 43.21B of the Revised Code of Washington (RCW) and Chapter 371-08 of the WAC. "Date of receipt" is defined in RCW 43.21B.001(2).

To appeal you must do all of the following within 30 days of the date of receipt of this Permit:

- File your appeal and a copy of this Permit with the PCHB (see addresses in this letter). Filing means actual receipt by the PCHB during regular business hours.
- Serve a copy of your appeal and this Permit on Ecology in paper form—by mail or in person (see addresses below). E-mail is not accepted.

You must also comply with other applicable requirements in Chapter 43.21B of the RCW and Chapter 371-08 of the WAC.

**1. To file your appeal with the Pollution Control Hearings Boards**

<b>Mail appeal to:</b>	<b>OR</b>	<b>Deliver your appeal in person to:</b>
Pollution Control Hearings Board PO Box 40903 Olympia, Washington 98504-0903		Pollution Control Hearings Board 1111 Israel Road, Southwest, Suite 301 Tumwater, Washington 98501

**2. To serve your appeal on the Department of Ecology**

<b>Mail appeal to:</b>	<b>OR</b>	<b>Deliver your appeal in person to:</b>
Department of Ecology Appeals Processor PO Box 47608 Olympia, Washington 98504-7608		Department of Ecology Appeals Processor 300 Desmond Drive Southeast Lacey, Washington 98503

**3. Send a copy of your appeal to:**

John Temple  
Department of Ecology  
Nuclear Waste Program  
3100 Port of Benton Boulevard  
Richland, Washington 99354

If there are any questions, please contact Matt Williams, Environmental Engineer, at (509) 372-7910 or [matt.williams@ecy.wa.gov](mailto:matt.williams@ecy.wa.gov), or John Temple, Project Manager, at (509) 372-7940 or [john.temple@ecy.wa.gov](mailto:john.temple@ecy.wa.gov).

Sincerely,

 Digitally signed  
by Schleif,  
Stephanie (ECY)

Stephanie Schleif  
Deputy Program Manager  
Nuclear Waste Program

mfw/jlg  
Enclosure

References:

1. Letter 20-ESQ-0055, dated April 22, 2020 “Response to Notice of Deficiency for the Waste Encapsulation and Storage Facility Operating Unit Group 14 Class 3 Permit Modification Request”
2. Letter 20-NWP-119, dated July 31, 2020, “Proposed Class 3 Permit Modification 8C.2018.2D to the Hanford Facility Resource Conservation and Recovery Act Permit, Dangerous Waste Portion, Revision 8C, for the Treatment, Storage, and Disposal of Dangerous Waste (Site-wide Permit), Part III, Operating Unit Group 14, Waste Encapsulation and Storage Facility (WESF), WA7890008967”

cc: See page 4

cc electronic w/o enc:

Dave Bartus, EPA  
David Einan, EPA  
Mary Beth Burandt, USDOE-ORP  
Lori Huffman, USDOE-ORP  
Christopher Kemp, USDOE-ORP  
Glyn Trenchard, USDOE-ORP  
Duane Carter, USDOE-RL  
Joe Franco, USDOE-RL  
Mostafa Kamal, USDOE-RL  
Tony McKarns, USDOE-RL  
Brittany Sparks, BNI  
Robert Bullock, CHPRC  
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Curt Clement, MSA  
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Lori Huffman, USDOE-ORP  
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John Wiesman, WDOH  
Randy Treadwell, WSDA  
Allyson Brooks, WSDAHP  
Cindy Preston, WSDNR

BNI Correspondence Control  
CHPRC Correspondence Control  
Environmental Portal  
Gonzaga University Foley Center Library  
Hanford Administrative Record:  
Hanford Site-wide Permit  
Hanford Facility Operating Record  
MSA Correspondence Control  
NWP RIM Coordinators, Ecology  
PNNL Correspondence Control  
Portland State University Library,  
Government Information  
University of Washington Suzzallo Library,  
Government Publications  
USDOE-ORP Correspondence Control  
USDOE Public Reading Room, CIC  
USDOE-RL Correspondence Control  
EPA Region 10 Hanford Field Office,  
Correspondence Control  
WRPS Correspondence Control

cc w/enc, DVD and hard copy:

Hanford Administrative Record: Hanford Site-wide Permit  
NWP Central File

cc w/enc, hard copy:

NWP Library: Hanford Site-wide Permit