



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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COVERSHEET

For Letter 20-NWP-119
Dated July 31, 2020

Re: 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

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 and the proposed permit modification are located at the Ecology website at <https://ecology.wa.gov/Waste-Toxics/Nuclear-waste/Public-comment-periods>. 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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July 31, 2020

20-NWP-119

Brian T. Vance, Manager
Office of River Protection
United States Department of Energy
PO Box 450, MSIN: H6-60
Richland, Washington 99352

Robert E. Wilkinson, President
Mission Support Alliance, LLC
PO Box 650, MSIN: H1-30
Richland, Washington 99352

Brian T. Vance, Manager
Richland Operations Office
United States Department of Energy
PO Box 550, MSIN: H5-30
Richland, Washington 99352

Michael H. Schlender,
Deputy Director for Operations
Pacific Northwest National Laboratory
PO Box 999, MSIN: K1-46
Richland, Washington 99352

Valerie McCain, Project Director
Bechtel National, Inc.
2435 Stevens Center Place, MSIN: MS19-A
Richland, Washington 99354

John R. Eschenberg, President
Washington River Protection Solutions
PO Box 850, MSIN: H3-04
Richland, Washington 99352

Ty Blackford, President and CEO
CH2M HILL Plateau Remediation Company
PO Box 1600, MSIN: A7-01
Richland, Washington 99352

Re: 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*

References: See page 4

Dear Addressees:

This letter transmits the proposed permit modification 8C.2018.2D to Part III, Operating Unit Group 14, WESF, of 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)*. The Permittees are the United States Department of Energy (USDOE) as owner/operator and CH2M HILL Plateau Remediation Company as co-operator.

USDOE held a public comment period regarding the Class 3 Permit Modification request for the WESF from November 27, 2017, through January 31, 2018 (Reference 1). They held a public meeting on December 13, 2017, at the Richland Public Library at 5:30 pm.

Ecology received 121 public comments from USDOE's comment period. As a result of the public comments received and after performing a completeness review, Ecology requested the following information from the Permittees and made the following modifications to the draft submittal:

- Ecology requested information regarding seismic considerations, an updated training plan, and general design, construction, and operation information for the proposed facility. This is documented in incompleteness determination letter 18-NWP-019, issued February 5, 2018 (Reference 2).
- The Permittees provide the technical information to make the application complete and addressed Ecology's technical deficiencies by updating all associated addenda to better describe the WESF.

Based upon the updated certified application submitted April 22, 2020 (Reference 3) and additional supporting documentation, Ecology has determined that the application is complete.

Ecology issued a *Response to Comments* document from the public comment period. Ecology's *Response to Comments* document is on the enclosed DVD (Ecology Publication 20-05-022) and on Ecology's publication website at <https://fortress.wa.gov/ecy/publications/SummaryPages/2005022.html>.

Washington Administrative Code 173-303-840(3)(d) requires at least a 45-day public comment period for the draft permit modification. Ecology will hold this public comment period from August 3, 2020 through September 18, 2020. This comment period initiates the second portion of the Class 3 Permit Modification. A public hearing is not scheduled, but Ecology will consider holding one if there is enough interest.

This proposed Class 3 Permit Modification would add the operating dangerous waste management units at the WESF to the Site-wide Permit. The modification also authorizes necessary physical and operational changes necessary for transfer of capsules containing dangerous waste from current storage at the WESF to dry storage at the separate Capsule Interim Storage facility.

The proposed permit modification is on the enclosed DVD and on Ecology's website at <https://ecology.wa.gov/Waste-Toxics/Nuclear-waste/Public-comment-periods>.

A DVD is also at the Hanford Public Information Repositories in Richland, Spokane, and Seattle, Washington, as well as Portland, Oregon. A hard copy 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

Individuals can request copies of the DVD and hard copies by contacting Ecology's Resource Center at (509) 372-7950.

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If there are any questions regarding this permit modification, please contact Matt Williams, Environmental Engineer, at matt.williams@ecy.wa.gov or (509) 372-7910, or Mandy Jones, Permit Coordinator, at mandy.jones@ecy.wa.gov or (509) 372-7916.

Sincerely,

 Digitally signed
by Schleif,
Stephanie (ECY)

Stephanie Schleif
Deputy Program Manager
Nuclear Waste Program

mfw/jlg
Enclosure

cc: See page 5

References:

1. Letter 18-AMRP-0013, dated November 16, 2017, “Hanford Facility Dangerous Waste Permit Part B Application for the Waste Encapsulation and Storage Facility (WESF) Operating Unit Group (OUG) DOE/RL-2017-43, Revision 0 and the Capsule Interim Storage (CIS) OUG DOE/RL-2017-44, Revision 0”
2. Letter 18-NWP-019, dated February 5, 2018, “Ecology’s Completeness Review for the Class 3 Permit Modification 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*”
3. 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”

cc electronic w/o enc:

Dave Bartus, USEPA
David Einan, USEPA
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
Robert Bullock, CHPRC
Moussa Jaraysi, CHPRC
Curt Clement, MSA
Jon Perry, MSA
Darci Teel, MSA

ERWM Staff, YN
Michael Stephenson, PNNL
Eric Van Mason, WRPS
Debra Alexander, Ecology
Jennifer Cantu, Ecology
Annette Carlson, Ecology
Suzanne Dahl, Ecology
Katie Hall, Ecology
Mandy Jones, Ecology
Nina Menard, Ecology
John Price, Ecology
Stephanie Schleif, Ecology
Dan Thompson, Ecology
NWP RIM Coordinators, Ecology

cc electronic w/enc. and DVD:

Tim Hamlin, USEPA
Tony McKarns, USDOE-RL
Brittany Sparks, BNI
Mason Murphy, CTUIR
Jack Bell, NPT
Rex Buck, Jr., Wanapum
Laurene Contreras, YN
Susan Leckband, HAB
Ken Niles, ODOE
Robin Priddy, BCAA
Matthew Drumheller, USACE
Trevor Fox, USFW
Mike Livingston, WDFW
John Martell, WDOH
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
USEPA 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