



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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March 4, 2020

20-NWP-042

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

Valerie McCain, Project Director  
Bechtel National, Inc.  
2435 Stevens Center Place, MSIN: H4-02  
Richland, Washington 99354

Re: Approval of 24590-LAW-PCN-ENV-19-009, Class <sup>1</sup>1 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 10, Waste Treatment and Immobilization Plant (WTP Permit), WA7890008967*

Reference: See page 2

Dear Brian T. Vance and Valerie McCain:

The Department of Ecology approves with changes the referenced Class <sup>1</sup>1 Modification. The approved Hanford Facility RCRA Permit Modification Notification Form is enclosed.

This modification provides the updated Piping and Instrumentation Diagram (P&ID) for the Low-Activity Waste Concentrate Receipt Process System (24590-LAW-M6-LCP-00001001, Rev 1).

The changes are listed on the enclosure and replace the corresponding permit P&ID in Appendix 9.2 of the WTP Permit. In addition to the permit changes, Ecology corrected Notes 12 and 13 on the Notification Form to match the wording on the P&ID.

If there are any questions, please contact Yoana Lucatero, WTP Permit Writer, at (509) 372-7917 or [yoana.lucatero@ecy.wa.gov](mailto:yoana.lucatero@ecy.wa.gov) or Annette Carlson, Permit Coordinator, at (509) 372-7987 or [annette.carlson@ecy.wa.gov](mailto:annette.carlson@ecy.wa.gov).

Sincerely,

Stephanie Schleif  
Deputy Program Manager  
Nuclear Waste Program

yl/ag  
Enclosure

cc: See page 2

RECEIVED

MAR 09 2020

EDMC



Reference: Letter 19-ECD-0089, dated December 20, 2019, "Submittal of Hanford Facility Resource Conservation and Recovery Act Permit Modification Notification Form 24590-LAW-PC-ENV-19-009, Revised Piping and Instrumentation Diagram"

cc electronic w/enc:

Dave Bartus, EPA  
Dave Einan, EPA  
Mary Beth Burandt, USDOE-ORP  
Tom Fletcher, USDOE-ORP  
Roger Gordon, USDOE-ORP  
Lori Huffman, USDOE-ORP  
Gae Neath, USDOE-ORP  
Delmar Noyes, USDOE-ORP  
Bryan Trimberger, USDOE-ORP  
Tony McKarns, USDOE-RL  
Paul Pak, USDOE-RL  
Dianne Casey, BNI  
Bob Haggard, BNI  
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Felice Presti, BNI  
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Suzanne Dahl, Ecology  
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Tracy Gao, Ecology  
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Yoana Lucatero, Ecology  
Dan McDonald, Ecology  
Stephanie Schleif, Ecology  
Oliver Wang, Ecology  
Nancy Ware, Ecology  
BNI Correspondence Control  
Environmental Portal  
Hanford Facility Operating Record  
MSA Correspondence Control  
USDOE-ORP Correspondence Control  
USDOE-RL Correspondence Control  
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Correspondence Control

cc w/enc:

Susan Leckband, HAB  
Hanford Administrative Record  
NWP Central File

cc w/o enc:

Mason Murphy, CTUIR  
Pat Mills, CTUIR  
Jack Bell, NPT  
Rex Buck Jr, Wanapum  
Laurene Contreras, YN

Quarter Ending: Dec 31, 2019  
RCRA Operating record number: R605

24590-LAW-PCN-ENV-19-009

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

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**Index**


Page 2 of 2: Hanford Facility RCRA Permit, Part III, Operating Unit 10, Waste Treatment and Immobilization Plant  
This modification is to update the LAW Facility LAW Concentrate Receipt Process System LCP -  
Bulge - 00001 P&ID in Appendix 9.2 of the DWP permit

Submitted by Co-Operator:

  
Robert D. Haggard

  
Date

Reviewed by ORP Program Office:

  
Thomas W. Fletcher

  
Date

Quarter Ending: Dec 31, 2019

24590-LAW-PCN-ENV-19-009

RCRA Operating record number: R605

Hanford Facility RCRA Permit Modification Notification Form														
Unit: <b>Waste Treatment and Immobilization Plant</b>	Permit Part: <b>Part III, Operating Unit 10</b>													
<p><b>Description of Modification:</b> The purpose of this Class 1 prime modification is to replace the following Piping and Instrumentation Diagram in Appendix 9.2 of the DWP:</p>														
<b>Appendix 9.2</b>														
Replace:	24590-LAW-M6-LCP-00001001, Rev 0	With:	24590-LAW-M6-LCP-00001001, Rev 1											
<p>This modification requests Ecology approval and incorporation into the permit the specific changes to the Piping and Instrumentation Diagram (P&amp;ID).</p> <p>Changes to the Piping and Instrumentation Diagram (24590-LAW-M6-LCP-00001001, Rev 1) for the LAW Concentrate Receipt Process System are summarized below:</p> <ul style="list-style-type: none"> <li>• Note 3: For double containment piping outside of C5V ventilated rooms and secondary confinement, the pressure boundary (outer encasement only) is quality level Q and seismic category SC-III. All other components shown on this drawing are quality level CM and seismic category SC-IV, unless otherwise noted.</li> <li>• Note 12 mentions that <i>leak into annular space of the</i> coaxial drain lines drain back to leak detection at EMF.</li> <li>• Note 13 lists incorporated revisions from 24590-LAW-M6N-LCP-00046, 24590-LAW-M6N-LCP-00048, 24590-LAW-M6N-LCP-00049, 24590-LAW-M6N-M80T-00016 and 24590-LAW-EIE-NS-17-0001 Rev 0 to this P&amp;ID.</li> <li>• Reference 1 incorporates the 24590-LAW-3ZD-LFP-00001, LAW Melter Feed Process (LFP) and Concentrate Receipt Process Vessels (LCP) System design descriptions. This document replaced the document previously referenced in revision 0.</li> </ul>														
<table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td style="width: 45%;">WAC 173-303-830 Modification Class:</td> <td style="width: 15%;">Class 1</td> <td style="width: 15%;">Class 11</td> <td style="width: 15%;">Class 2</td> <td style="width: 10%;">Class 3</td> </tr> <tr> <td>Please mark the Modification Class:</td> <td></td> <td style="text-align: center;">X</td> <td></td> <td></td> </tr> </table>					WAC 173-303-830 Modification Class:	Class 1	Class 11	Class 2	Class 3	Please mark the Modification Class:		X		
WAC 173-303-830 Modification Class:	Class 1	Class 11	Class 2	Class 3										
Please mark the Modification Class:		X												
<p>Enter relevant WAC 173-303-830, Appendix I Modification citation number: N/A</p> <p>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 11 modification. WAC 173-303-830(4)(d)(i)(A) states, "Class 1 modifications apply to minor changes that keep the permit current with routine changes to the 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."</p>														
<p>Modification Approved/Concur: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> Denied (state reason below)</p> <p>Reason for denial:</p>			<p>Reviewed by Ecology:</p> <p style="text-align: center;"><i>S. Schleif</i> S. Schleif</p> <p style="text-align: center;"><i>3/1/2020</i> Date</p>											