



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

August 22, 2019

19-NWP-139

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-18-010, 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 the referenced Class <sup>1</sup>1 Modification. The approved Hanford Facility RCRA Permit Modification Notification Form is enclosed.

This modification provides the updated *IQRPE Structural Integrity Assessment Report for LAW LVP Thermal Catalytic Oxidizer/Reducer (TCO Unit), 24590-CM-HC4-HXYG-00240-02-00012, Rev. 00B, IA-3013146-001.*

The changes are listed on the enclosure and this modification approves replacement of the IQRPE Structural Integrity Assessment Report in Appendix 9.11 of the WTP Permit.

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

Sincerely,

Suzanne Dahl  
Dangerous Waste Permit Manager  
Nuclear Waste Program

yl/aa  
Enclosure

cc: See page 2

RECEIVED

AUG 27 2019

EDMC



Reference: Letter 19-ECD-0056, dated July 18, 2019, "Submittal of Hanford Facility Resource Conservation and Recovery Act Permit Modification Notification Form 24590-LAW-PCN-ENV-18-010, Independent, Qualified, Registered Professional Engineer Structural Integrity Assessment Report"

cc electronic w/enc:

Dave Bartus, EPA	Jennifer Cantu, Ecology
Dave Einan, EPA	Annette Carlson, Ecology
Mary Beth Burandt, USDOE-ORP	Nitya Chandran, Ecology
Tom Fletcher, USDOE-ORP	Suzanne Dahl, Ecology
Roger Gordon, USDOE-ORP	Jay Decker, Ecology
Lori Huffman, USDOE-ORP	Tracy Gao, Ecology
Gae Neath, USDOE-ORP	Mandy Jones, Ecology
Delmar Noyes, USDOE-ORP	Yoana Lucatero, Ecology
Bryan Trimberger, USDOE-ORP	Dan McDonald, Ecology
Tony McKarns, USDOE-RL	Oliver Wang, Ecology
Bob Haggard, BNI	Nancy Ware, Ecology
Felice Presti, BNI	BNI Correspondence Control
Donna Yasek, BNI	Environmental Portal
Jon Perry, MSA	Hanford Facility Operating Record
ERWM Staff, YN	MSA Correspondence Control
Ken Niles, ODOE	USDOE-ORP Correspondence Control
Gail Laws, WDOH	USDOE-RL Correspondence Control

Debra Alexander, Ecology

cc w/enc:


Susan Leckband, HAB  
Hanford Administrative Record  
NWP Central File

cc w/o enc:

Matt Johnson, CTUIR  
Jack Bell, NPT  
Laurene Contreras, YN  
Alyssa Buck, Wanapum

Quarter Ending Sept 30, 2019

24590-LAW-PCN-ENV-18-010

<b>Hanford Facility RCRA Permit Modification Notification Form</b>					
Unit: <b>Waste Treatment and Immobilization Plant</b>		Permit Part: <b>Part III, Operating Unit 10</b>			
<u>Description of Modification:</u>					
<p>This Class 11 modification requests Ecology approval and incorporation into the permit the below referenced structural integrity assessment report. The report has been updated by the Independent Qualified Registered Professional Engineer (IQRPE).</p>					
<b>Appendix 9.11</b>					
Replace:	24590-CM-HC4-HXYG-00240-02-00012, Rev. 00A, IA-3013146-000; IQRPE Structural Integrity Assessment Report for LAW LVP Thermal Catalytic Oxidizer/Reducer (TCO Unit)	With:	24590-CM-HC4-HXYG-00240-02-00012, Rev. 00B, IA-3013146-001; IQRPE Structural Integrity Assessment Report for LAW LVP Thermal Catalytic Oxidizer/Reducer (TCO Unit)		
<p>The scope of this Structural Integrity Assessment includes the LAW Catalytic Oxidizer/Reducer Miscellaneous Units, collectively known as Thermal Catalytic/Oxidizer (TCO Unit). This TCO Unit houses four subcomponents namely; Selective Catalyst Oxidizer (LVP-SCO-00001), Selective Catalyst Reducer (LVP-SCR-00001), Electric Heater (LVP-HTR-00002), and Heat Recovery Exchanger (LVP-HX-00001).</p> <p>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 contain adequate design requirements and controls to ensure the design fully satisfies the requirements of State of Washington Administrative Code (WAC), 173-303-640 WAC, Dangerous Waste Regulations.</p> <p>This PCN updates information in Appendix 9.11 to reflect current design. This DWP component may be re-evaluated to confirm design adequacy. If the re-evaluation results in future design changes, the changes will be reviewed by Ecology in subsequent permit modifications.</p> <p>In accordance with Permit Condition III.10.C.2.e, this permit modification includes an updated IQRPE Structural Integrity Assessment Report for inclusion in Appendix 9.11.</p>					
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:</p> <p>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)(ii)(A) states. "Class 11 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 11 modifications, the director may require prior approval."</p>					
Modification Approved/Concur:	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	Denied (state reason below)	
Reason for denial:			Reviewed by Ecology:  S. Dahl		
			8-22-19 Date		

Quarter Ending Sept 30, 2019

24590-LAW-PCN-ENV-18-010

---

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

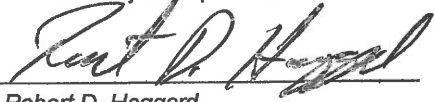
---

Index

Page 2 of 3: Hanford Facility RCRA Permit, Part III, Operating Unit 10, Waste Treatment and Immobilization Plant

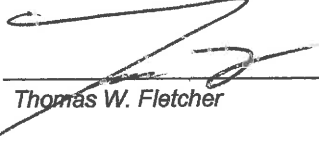
This Integrity Assessment addresses updates to the LAW Catalytic Oxidizer/Reducer Miscellaneous Units, collectively known as Thermal Catalytic/Oxidizer (TCO Unit). The TCO Unit is mounted on a skid (LVP-SKID-00002) located in Room L-0304F at Floor Elevation 48'-0".

Submitted by Co-Operator:

  
\_\_\_\_\_  
Robert D. Haggard

6/13/19  
\_\_\_\_\_  
Date

Reviewed by ORP Program Office:

  
\_\_\_\_\_  
Thomas W. Fletcher

7/8/19  
\_\_\_\_\_  
Date