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STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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March 14, 2019

19-NWP-025

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 Manager  
Bechtel National, Inc.  
2435 Stevens Center Place, MSIN: H4-02  
Richland, Washington 99354

Re: Approval of 24590-LAB-PCN-ENV-18-001, 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

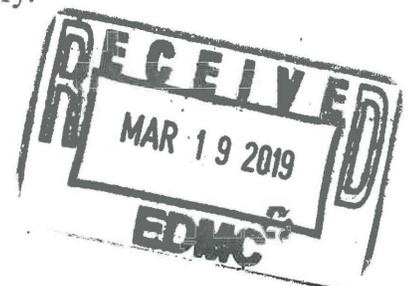
Dear Brian T. Vance and Valerie McCain:

The Department of Ecology (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 Corrosion Evaluations for the Analytical Laboratory Radioactive Liquid Waste Disposal (LAB RLD) System 24590-LAB-N1D-RLD-00002, Revision 3, and 24590-LAB-N1D-RLD-00003, Revision 4. The changes are listed on the enclosure and replace the corresponding permit Corrosion Evaluations in Appendix 11.9 of the WTP Permit.

Ecology is documenting an outstanding comment in the modification review, the Molarity Section in the 24590-LAB-N1D-RLD-00003 Corrosion Evaluation has incomplete sentences. Bechtel National, Inc. noted in their response to Ecology that the Process Corrosion Data Sheet, which is the source of this information, will address the discrepancy in the next revision. However, the Corrosion Evaluation will not be revised.

Ecology expects the Permittees to revise the 24590-LAB-N1D-RLD-00003 Corrosion Evaluation with the correct molarity prior to receipt of waste at the Laboratory.



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If there are any questions, please contact Annette Carlson, Permit Coordinator, at (509) 372-7897 or [annette.carlson@ecy.wa.gov](mailto:annette.carlson@ecy.wa.gov).

Sincerely,



Suzanne Dahl  
Dangerous Waste Permit Manager  
Nuclear Waste Program

asc/sh  
Enclosure

Reference: Letter 19-ECD-0001, dated January 14, 2019, "Submittal of Hanford Facility  
Resource Conservation and Recovery Act Permit Modification Notification Form  
24590-LAB-PCN-ENV-18-001"

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cc: See page 3

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cc electronic w/enc:

Dave Bartus, EPA  
Dave Einan, EPA  
Mary Beth Burandt, USDOE  
Tom Fletcher, USDOE  
Roger Gordon, USDOE  
Lori Huffman, USDOE  
Tony McKarns, USDOE  
Gae Neath, USDOE  
Delmar Noyes, USDOE  
Paul Pak, USDOE  
Bryan Trimberger, USDOE  
D.E. Casey, BNI  
Roger Landon, BNI  
Felice Presti, BNI  
Dan Robertson, BNI  
Donna Yasek, BNI  
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Gail Laws, WDOH  
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Jennifer Cantu, Ecology  
Annette Carlson, Ecology  
Suzanne Dahl, Ecology  
Jay Decker, Ecology  
Tracy Gao, Ecology  
Mandy Jones, Ecology  
Yoana Lucatero, Ecology  
Dan McDonald, Ecology  
Oliver Wang, Ecology  
Nancy Ware, Ecology  
BNI Correspondence Control  
Environmental Portal  
Hanford Facility Operating Record  
MSA Correspondence Control  
USDOE-ORP Correspondence Control

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 Dec. 31, 2018

24590-LAB-PCN-ENV-18-001

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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 3: Hanford Facility RCRA Permit, Part III, Operating Unit 10, Waste Treatment and Immobilization Plant  
Replace the Corrosion Evaluations for the Analytical Laboratory (Lab) Area Sink Drain Collection Vessel (RLD-VSL-00164) and the Hotcell Drain Collection Vessel (RLD-VSL-00165) in Appendix 11.9 of the Dangerous Waste Permit (DWP).

Submitted by Co-Operator:

Reviewed by ORP Program Office:

Roger J. Landon      12/13/18  
Roger J. Landon      Date

Thomas W. Fletcher      2/10/19  
Thomas W. Fletcher      Date

Quarter Ending Dec. 31, 2018

24590-LAB-PCN-ENV-18-001

<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>															
<p><u>Description of Modification:</u> The purpose of this Class 1 prime modification is to update and replace the following corrosion evaluations in Appendix 11.9 of the DWP.</p>																
<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th colspan="4" style="text-align: left; padding: 2px;">Appendix 11.9</th> </tr> </thead> <tbody> <tr> <td style="width: 15%; padding: 2px;">Replace:</td> <td style="width: 35%; padding: 2px;">24590-LAB-N1D-RLD-P0002, Rev. 1</td> <td style="width: 15%; padding: 2px;">With:</td> <td style="width: 35%; padding: 2px;">24590-LAB-N1D-RLD-00002, Rev. 3</td> </tr> <tr> <td style="padding: 2px;">Replace:</td> <td style="padding: 2px;">24590-LAB-N1D-RLD-P0003, Rev. 1</td> <td style="padding: 2px;">With:</td> <td style="padding: 2px;">24590-LAB-N1D-RLD-00003, Rev. 4</td> </tr> </tbody> </table>					Appendix 11.9				Replace:	24590-LAB-N1D-RLD-P0002, Rev. 1	With:	24590-LAB-N1D-RLD-00002, Rev. 3	Replace:	24590-LAB-N1D-RLD-P0003, Rev. 1	With:	24590-LAB-N1D-RLD-00003, Rev. 4
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Replace:	24590-LAB-N1D-RLD-P0003, Rev. 1	With:	24590-LAB-N1D-RLD-00003, Rev. 4													
<p>This modification requests Ecology approval and incorporation into the permit the specific changes to the corrosion evaluations. These documents include changes provided in applicable document change forms (e.g., DCN, SCN, SDDR, FCN, FCR, etc.). In addition, the corrosion evaluations include changes associated with the resolution to comments on change documents since the issuance of the last revision of the permitted documents.</p>																
<p>Significant changes to the corrosion evaluations are summarized below:</p> <ul style="list-style-type: none"> <li>• Revised the corrosion evaluations completely by implementing the new document format by replacing the permit version.</li> <li>• Updated the information in the Materials Considered, Recommended Material, Operating Restrictions, Corrosion/Erosion Detailed Discussion, References sections and the Process Corrosion Data Sheet (PCDS) when applicable.</li> <li>• Added new Inputs and References, Assumptions and Justification and Operating Restrictions sections.</li> <li>• Added the Description of Vessel/Equipment, System Functions, Description of Process Functions, Process Modes and Summary of Processing Conditions sections.</li> <li>• Added discussion about the piping configurations associated with RLD-VSL-00164 to support DFLAW configuration. These include isolation of RLD-VSL-00165, and description that tanker truck transfers will be deleted since the tank transfer header from RLD-VSL-00164 has been converted into the new transfer line header to EMF.</li> </ul>																
<p>This PCN updates information in Appendix 11.9 to reflect current design. These DWP components 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 sent to Ecology includes the revised Corrosion Evaluations for inclusion in Appendix 11.9.</p>																
<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 50%; padding: 2px;">WAC 173-303-830 Modification Class:</th> <th style="width: 12.5%; padding: 2px;">Class 1</th> <th style="width: 12.5%; padding: 2px;">Class 1<sup>1</sup></th> <th style="width: 12.5%; padding: 2px;">Class 2</th> <th style="width: 12.5%; padding: 2px;">Class 3</th> </tr> </thead> <tbody> <tr> <td style="padding: 2px;">Please mark the Modification Class:</td> <td style="text-align: center; padding: 2px;"></td> <td style="text-align: center; padding: 2px;">X</td> <td style="text-align: center; padding: 2px;"></td> <td style="text-align: center; padding: 2px;"></td> </tr> </tbody> </table>					WAC 173-303-830 Modification Class:	Class 1	Class 1 <sup>1</sup>	Class 2	Class 3	Please mark the Modification Class:		X				
WAC 173-303-830 Modification Class:	Class 1	Class 1 <sup>1</sup>	Class 2	Class 3												
Please mark the Modification Class:		X														
<p>Enter relevant WAC 173-303-830, Appendix I Modification citation number:</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 1<sup>1</sup> 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 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>																

Quarter Ending Dec. 31, 2018

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Modification Approved/Concur: <u>Reason for denial:</u>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> Denied (state reason below)	Reviewed by Ecology:	
		 S. Dahl	3/14/19 Date