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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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October 31, 2017

17-NWP-157

Mr. Benton J. Harp, Acting Manager
Office of River Protection
United States Department of Energy
PO Box 450, MSIN: H6-60
Richland, Washington 99352

Ms. Peggy McCullough, Project Director
Bechtel National, Inc.
2435 Stevens Center Place, MSIN: H4-02
Richland, Washington 99354

Re: Approval of 24590-LAW-PCN-ENV-15-002, Class ¹1 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 Mr. Harp and Ms. McCullough:

The Department of Ecology approves the referenced Class ¹1 Modification. The approved Hanford Facility RCRA Permit Modification Notification Form is enclosed.

This modification provides updated Piping and Instrumentation Diagrams (P&IDs) for the Low Activity Waste Secondary Offgas/Vessel Vent Process System Offgas Exhausters LVP-EXHR-00001A (24590-LAW-M6-LVP-00001004, Revision 1), LVP-EXHR-00001B (24590-LAW-M6-LVP-00001005, Revision 1), and LVP-EXHR-00001C (24590-LAW-M6-LVP-00001006, Revision 1).

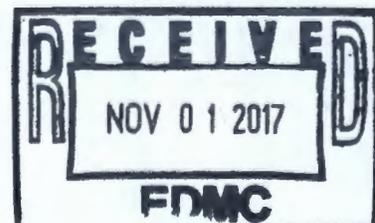
The changes are listed on the enclosure and replace the corresponding permit P&IDs in Appendix 9.2 of the WTP Permit.

If there are any questions, please contact Jennifer Cantu, WTP Permit Writer, at (509) 372-7907 or jennifer.cantu@ecy.wa.gov.

Sincerely,

Suzanne Dahl
Dangerous Waste Permit Manager
Nuclear Waste Program

jc/mrb
Enclosure



cc: See page 2



0408481

Mr. Harp and Ms. McCullough
October 31, 2017
Page 2

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Reference: Letter 17-ECD-0038, received June 28, 2017, "Submittal of Hanford Facility Resource Conservation and Recovery Act Permit Modification Notification Form

1245181 24590-LAW-PCN-ENV-15-002"

cc electronic w/enc:

Dave Bartus, EPA
Laura Buelow, EPA
Mary Beth Burandt, USDOE
Bill Hamel, USDOE
Lori Huffman, USDOE
Joanne Grindstaff, USDOE
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Deborah Alexander, Ecology
Jennifer Cantu, Ecology
Annette Carlson, Ecology
Suzanne Dahl, Ecology
Tracy Gao, Ecology
Mandy Jones, Ecology
Yoana Lucatero, Ecology
Dan McDonald, Ecology
John Richardson, Ecology
Oliver Wang, Ecology
Nancy Ware, Ecology
BNI Correspondence Control
Environmental Portal
Hanford Operating Record General File
MSA Correspondence Control
USDOE-ORP Correspondence Control

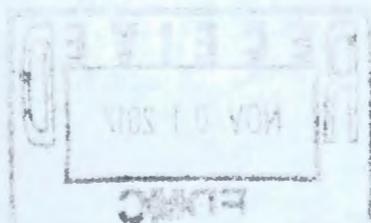
cc w/enc:

Rose Longoria, YN
Susan Leckband, HAB

USDOE Administrative Record: Waste Treatment Plant (TSD #H-0-8)
NWP Central File

cc w/o enc:

Matt Johnson, CTUIR
Jack Bell, NPT



Quarter Ending June 30, 2017

24590-LAW-PCN-ENV-15-002

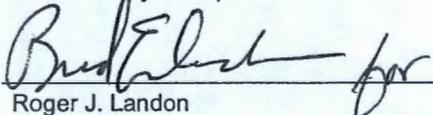
Hanford Facility RCRA Permit Modification Notification Form
Part III, Operating Unit 10
Waste Treatment and Immobilization Plant

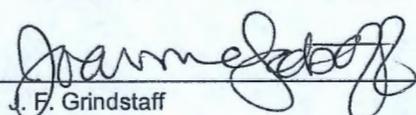
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Page 2 of 3: Hanford Facility RCRA Permit, Part III, Operating Unit 10, Waste Treatment and Immobilization Plant
Replace Piping and Instrumentation Diagrams (P&IDs) for the LAW Secondary Offgas/Vessel Vent Process System (LVP) in Appendix 9.2 of the Dangerous Waste Permit (DWP).

Submitted by Co-Operator:

Reviewed by ORP Program Office:

 for 5-10-17
Roger J. Landon Date

 6/21/17
J. F. Grindstaff Date

Quarter Ending June 30, 2017

24590-LAW-PCN-ENV-15-002

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

Description of Modification:

The purpose of this Class 1 prime modification is to update and replace the following P&IDs in Appendix 9.2 of the DWP:

Appendix 9.2			
Replace:	24590-LAW-M6-LVP-00001004, Rev. 0	With:	24590-LAW-M6-LVP-00001004, Rev. 1
	24590-LAW-M6-LVP-00001005, Rev. 0		24590-LAW-M6-LVP-00001005, Rev. 1
	24590-LAW-M6-LVP-00001006, Rev. 0		24590-LAW-M6-LVP-00001006, Rev. 1

This modification requests Ecology approval and incorporation into the permit the specific changes to the P&IDs indicated by revision notes and clouds. These documents include changes provided in applicable document change forms (e.g., DCN, SCN, SDDR, FCN, FCR, etc.). In addition, the P&IDs include changes associated with the resolution to comments on change documents since the issuance of the last revision of the permitted documents.

Significant changes common to all P&IDs are summarized below:

- Modified, added, and deleted notes.
- Incorporated changes from change documentation identified in the Notes section on each drawing.

Significant changes specific to:

24590-LAW-M6-LVP-00001004, Rev. 1

- Revised control valve YV-0159 from a position of fail closed (FC) to fail open (FO) in Grid B7.
- Relabeled valves from LVP-V-01597 to LVP-V-01599 and LVP-V-01657 to LVP-V-01653 in Grids E3 and F3.
- Added details for Exhauster Seal Purge Bottle Rack (LVP-RK-00009), bottle regulators (PCV-0304 and PCV-0305), instruments, and valves in Grids A8, B7, B8, C7, and C8.
- Provided configurations and interface connections for Melter Offgas Exhauster LVP-EXHR-00001A and power/control panels LVP-PNL-00017 and LVP-PNL-00018 in Grids B3 through B6, C3 through C6, D3 through D6, and E3 through E6.
- Deleted instruments VT-0151 and VE-0151 (shown in superseded Rev. 0 drawing, Grid F5).
- Updated references to off-sheet P&IDs (multiple grids).

24590-LAW-M6-LVP-00001005, Rev. 1

- Revised control valve YV-0163 from a position of FC to FO in Grid B7.
- Added details for Exhauster Seal Purge Bottle Rack (LVP-RK-00010), bottle regulators (PCV-0306 and PCV-0307), instruments, and valves in Grids A8, B7, B8, C7, and C8.
- Provided configurations and interface connections for Melter Offgas Exhauster LVP-EXHR-00001B and power/control panels LVP-PNL-00020 and LVP-PNL-00021 in Grids B3 through B6, C3 through C6, D3 through D6, and E3 through E6.
- Deleted instruments VT-0152 and VE-0152 (shown in superseded Rev. 0 drawing, Grid F5).
- Updated references to off-sheet P&IDs in Grids G8 and H8.

24590-LAW-M6-LVP-00001006, Rev. 1

- Revised control valve YV-0167 from a position of FC to FO in Grid B7.
- Added details for Exhauster Seal Purge Bottle Rack (LVP-RK-00011), bottle regulators (PCV-0308 and PCV-0309), instruments, and valves in Grids A8, B7, B8, C7, and C8.

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24590-LAW-PCN-ENV-15-002

- Provided configurations and interface connections for Melter Offgas Exhauster LVP-EXHR-00001C and power/control panels LVP-PNL-00023 and LVP-PNL-00024 in Grids B3 through B6, C3 through C6, D3 through D6, and E3 through E6.
- Deleted instruments VT-0153 and VE-0153 (shown in superseded Rev. 0 drawing, Grid F5).
- Updated references to off-sheet P&IDs (multiple grids).

This PCN updates information in Appendix 9.2 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.

The following outstanding change documents have been submitted to Ecology pursuant to Permit Condition III.10.C.9.h and are maintained in the WTP Operating Record:

24590-LAW-TMOD-LVP-0001 – provided to Ecology in milk run (CCN 254068)

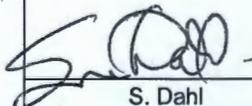
In accordance with Permit Condition III.10.C.2.e, this permit modification sent to Ecology may include page changes to the Permit, attachments, and permit application supporting documentation.

WAC 173-303-830 Modification Class:	Class 1	Class 11	Class 2	Class 3
Please mark the Modification Class:		X		

Enter relevant WAC 173-303-830, Appendix I Modification citation number: N/A

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)(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."

Modification Approved/Concur: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> Denied (state reason below) Reason for denial:	Reviewed by Ecology:  S. Dahl	Date: 10/31/17
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