



U.S. Department of Energy

**Office of River Protection**

0059928



JUL 21 2003

03-ED-108

Mr. Michael A. Wilson, Program Manager  
Nuclear Waste Program  
State of Washington  
Department of Ecology  
1315 W. Fourth Avenue  
Kennewick, Washington 99336

**RECEIVED**  
JUL 29 2003  
**EDMC**

Dear Mr. Wilson:

**SUBMITTAL OF CLASS 1 MODIFICATION REQUEST FOR CHANGES TO INTERIM COMPLIANCE DATES**

Reference: WA7890008967, "Dangerous Waste Portion of the Hanford Facility Resource Conservation and Recovery Act Permit for the Treatment, Storage, and Disposal of Dangerous Waste, Chapter 10 and Attachment 51, 'Waste Treatment and Immobilization Plant.'"

Attached for your review and approval is a Class 1 permit modification requesting changes to the permit conditions for the Waste Treatment and Immobilization Plant unit in the referenced permit.

Specifically, the modification form proposes to change the submittal dates for engineering information for High-Level Waste (HLW) vitrification miscellaneous treatment unit secondary containment, sub-systems, and sub-system equipment. Modification of these interim compliance dates is necessary to allow for the development and submittal of information for the HLW vitrification miscellaneous treatment unit equipment. The original compliance dates were based on the availability of melter design and did not include the off-gas treatment train.

This modification request was discussed in advance with Ecology staff on June 27, 2003.

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Richland Operations Office  
P.O. Box 550  
Richland, Washington 99352

Office of River Protection  
P.O. Box 450  
Richland, Washington 99352

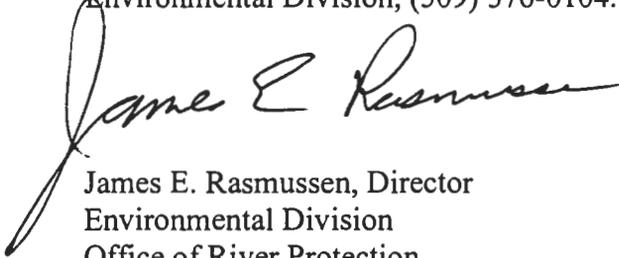
Bechtel National, Inc.  
2435 Stevens Center Place  
Richland, Washington 99352

Mr. Michael A. Wilson  
03-ED-108

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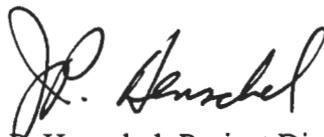
If you have any questions, please contact Lori A. Huffman, Office of River Protection,  
Environmental Division, (509) 376-0104.



James E. Rasmussen, Director  
Environmental Division  
Office of River Protection



Joel Hebdon, Director  
Regulatory Compliance and Analysis Division  
Richland Operations Office



J. P. Henschel, Project Director  
Bechtel National, Inc.

Attachment

cc w attach:

B. Erlandson, BNI  
J. P. Henschel, BNI  
J. Cox, CTUIR  
S. L. Dahl, Ecology  
L. E. Ruud, Ecology  
S. J. Skurla, Ecology  
S. A. Thompson, FHI  
J. L. Hanson, INNOV  
P. Sobotta, NPT  
J. B. Hebdon, RL (w/o attach)  
A. C. McKarns, RL  
R. Jim, YN  
**Administrative Record**  
Environmental Portal, LMSI

**Attachment  
03-ED-108**

**Class 1 Permit Modification Form for the  
Waste Treatment and Immobilization Plant**

**Hanford Facility RCRA Permit Modification Notification Forms**  
**Part III, Chapter 10 and Attachment 51**  
**Waste Treatment and Immobilization Plant**

July 11, 2003

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Page 2 of 5:     Hanford Facility RCRA Permit Modification Notification Form

Modification of Interim Compliance Schedule Date in Appendix 1.0 to Submit Engineering Information for HLW Vitrification Miscellaneous Treatment Unit:

- Secondary Containment (Item 27)
- Sub-Systems (Item 28) and,
- Sub-System Equipment (Item 29)

Attachment 51, Appendix 1.0, WTP Compliance Schedule

**Hanford Facility RCRA Permit Modification Notification Form**

Unit: <b>Waste Treatment and Immobilization Plant</b>	Permit Part & Chapter: <b>Part III, Chapter 10 and Attachment 51</b>
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Description of Modification: The purpose of this modification is to update interim compliance dates in the WTP Interim Compliance Schedule Appendix 1.0 (Items 27, 28, and 29). Modification of these interim compliance dates is necessary to allow for the development and submittal of information for the HLW vitrification miscellaneous treatment unit secondary containment, sub-systems, and sub-system equipment. The original compliance date was based on the availability of melter design and did not include the off-gas treatment train. In addition, WTP project schedules have been rebaselined to reflect incorporation of an additional high level waste melter and deletion of a low activity waste melter to reflect the new 2+2 melter configuration.

Attachment 51, Chapter : 10, Volume II, Appendix 1.0  
Redline/strikeout of modification

*Appendix 1.0*  
**WTP Interim Compliance Schedule**

Interim Compliance Schedule- WTP Facility		
	Compliance Schedule Submittal	Interim Compliance Date
<b>HLW SHORT TERM MELTER UNIT</b>		
27.	Submit engineering information for HLW Vitrification Miscellaneous Treatment Unit secondary containment	11/21/03 <u>1/22/05</u>
28.	Submit engineering information for HLW Vitrification Miscellaneous Treatment Unit sub-system	08/01/03 <u>6/18/05</u>
29.	Submit engineering information for equipment for each HLW Vitrification Miscellaneous Treatment Unit sub-system	08/01/03 <u>6/18/05</u>

Modification Class: <sup>123</sup>	Class 1	Class <sup>1</sup> 1	Class 2	Class 3
Please check one of the Classes:		X		

Relevant WAC 173-303-830, Appendix I Modification: A.5.a

Enter wording of the modification from WAC 173-303-830, Appendix I citation

Schedule of Compliance: Changes in interim compliance dates, with prior approval of the director.

Submitted by Co-Operator: <i>J.P. Henschel</i> 7/16/03	Reviewed by RL Program Office: <i>W.J. Taylor</i> 7/15/03	Reviewed by Ecology:	Reviewed by Ecology:
J.P. Henschel      Date	W. J. Taylor      Date	S. Dahl-Crumpler      Date	L. Ruud      Date

<sup>1</sup>Class 1 modifications requiring prior Agency approval.  
<sup>2</sup>This is only an advanced notification of an intended Class <sup>1</sup>1, 2, or 3 modification, this should be followed with a formal modification request, and consequently implement the required Public Involvement processes when required.  
<sup>3</sup>If the proposed modification does not match any modification listed in WAC 173-303-830 Appendix I, then the proposed modification should automatically be given a Class 3 status. This status may be maintained by the Department of Ecology, or down graded to <sup>1</sup>1, if appropriate.

**Hanford Facility RCRA Permit Modifications**  
**Part III, Chapter 10 and Attachment 51**  
**Waste Treatment and Immobilization Plant**

July 11, 2003

Replacement Sections

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Attachment 51, Appendix 1.0, WTP Compliance Schedule

*Appendix 1.0*  
WTP Interim Compliance Schedule

<b>Interim Compliance Schedule- WTP Facility</b>		
	<b>Compliance Schedule Submittal</b>	<b>Interim Compliance Date</b>
	<b>III.10.C.2</b>	
1.	Submit documentation stating the WTP has been constructed in compliance with the Permit.	11/30/07
2.	Submit updated Site Transportation Report for incorporation into the Administrative Record.	12/31/03
	<b>III.10.C.3</b>	
3.	Revise and Submit Waste Analysis Plan and associated Quality Assurance Project Plan to Ecology for review and approval	08/12/05
	<b>III.10.C.5.</b>	
4.	Update and submit for approval "Procedures to Prevent Hazards", Chapter 6.0 Sections 6.3, 6.4, 6.5 and the Inspection Schedule.	08/01/06
	<b>III.10.C.6</b>	
5.	Update and submit the Contingency Plan	08/01/06
	<b>III.10.C.7</b>	
6.	Update and resubmit for review and approval Training Program description in Chapter 8 of the Permit.	08/01/06
7.	Submit under separate cover the actual WTP Dangerous Waste Training Plan for incorporation into Administrative Record.	08/01/06
	<b>III.10.C.8</b>	
8.	Update and resubmit the Closure Plan for approval	08/01/06
	<b>III.10.C.11</b>	
9.	Submit Risk Assessment Workplan, revised in consultation with Ecology.	08/15/03
	<b>CONTAINERS</b>	
10.	Submit detailed information associated with containers and container management areas	10/01/04
11.	Submit descriptions of container management practices	08/01/06
12.	Submit engineering information for each secondary containment and leak detection system for the WTP Tank System to be included in the permit	11/03/03
13.	Submit engineering information for each dangerous waste tank and primary sump to be included in the permit	05/01/04
14.	Submit engineering information for each tank system ancillary equipment to be included in the permit	05/01/04
15.	Submit descriptions of tank management practices	08/01/06
	<b>CONTAINMENT BUILDINGS</b>	
16.	Submit engineering information for each containment building to be included in the permit	02/01/04
17.	Submit descriptions of containment building management practices	08/01/06
	<b>PRETREATMENT PLANT MISC. UNITS SYSTEMS</b>	
18.	Submit engineering information for secondary containment and leak detection system for the Pretreatment Plant Miscellaneous Unit Systems	09/16/03
19.	Submit engineering information for Pretreatment Plant Miscellaneous Unit Systems	10/01/04
20.	Submit engineering information for Pretreatment Plant Miscellaneous Unit	10/01/04

<b>Interim Compliance Schedule- WTP Facility</b>		
	<b>Compliance Schedule Submittal</b>	<b>Interim Compliance Date</b>
	Systems equipment	
21.	Submit descriptions of management practices for the Pretreatment Miscellaneous Treatment System	07/01/07
	<b>LAW SHORT TERM MELTER UNIT</b>	
22.	Submit engineering information for LAW Vitrification Miscellaneous Treatment Unit secondary containment	03/01/04
23.	Submit engineering information for LAW Vitrification Miscellaneous Treatment Unit sub-system	05/01/04
24.	Submit engineering information for equipment for each LAW Vitrification Miscellaneous Treatment Unit sub-system	05/01/04
25.	Submit descriptions of management practices for the LAW Vitrification Miscellaneous Treatment System	08/01/06
26.	Submit LAW Vitrification Environmental Performance Demonstration Test Plan for Ecology review and approval	08/01/06
	<b>HLW SHORT TERM MELTER UNIT</b>	
27.	Submit engineering information for HLW Vitrification Miscellaneous Treatment Unit secondary containment	1/22/05
28.	Submit engineering information for HLW Vitrification Miscellaneous Treatment Unit sub-system	6/18/05
29.	Submit engineering information for equipment for each HLW Vitrification Miscellaneous Treatment Unit sub-system	6/18/05
30.	Submit descriptions of management practices for the HLW Vitrification Miscellaneous Treatment System	01/02/07
31.	Submit HLW Vitrification Environmental Performance Demonstration Test Plan for Ecology review and approval	01/02/07
32.	Final Compliance Date	12/31/07