



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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COVERSHEET

For Letter 20-NWP-115
Dated July08, 2020

Re: Submittal of the Requests for Temporary Authorizations to Support the Low-Activity Waste Pretreatment System (LAWPS) Operating Unit Group Permit

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July 08, 2020

20-NWP-115

Brian T. Vance, Manager
Richland Operations Office
United States Department of Energy
PO Box 550, MSIN: H5-20
Richland, Washington 99352

Re: Submittal of the Requests for Temporary Authorizations to Support the Low-Activity Waste Pretreatment System (LAWPS) Operating Unit Group Permit

References: See page 4

Dear Brian T. Vance:

The Department of Ecology (Ecology) is in receipt of your requests for Temporary Authorization (TA) to support the Low-Activity Waste Pretreatment System Operating Unit Group (LAWPS OUG) Permit (Reference 1). The United States Department of Energy (USDOE) originally submitted three separate TA requests in one letter. Ecology is evaluating the approval of each TA request individually.

This approval letter is specific to TA Request #1, detailed in Reference 1 and 2.

In USDOE's TA Request #1, the following activities have been requested for construction of the portions of the LAWPS OUG described as follows:

- Place concrete for the foundations and pad supporting the Tank Side Cesium Removal (TSCR) Process Enclosure and Control Enclosure.
- Placement of the TSCR Process and Control Enclosures on the pad and anchoring them in place. This activity does not include hookup of the TSCR Process Enclosure to Hose-In-Hose Transfer Lines (HIHTLs).
- Place HIHTLs in excavations and on support structures. This includes connection of HIHTLs to Double-Shell Tank (DST) OUG process equipment at the AP-106, AP-107, and AP-108 tanks in the 241-AP Farm.
- Backfill and place shielding and bridge plates over the HIHTLs.

Ecology has reviewed TA Request #1 in conjunction with the permit application material, provided by USDOE and Washington River Protection Solutions (the Permittees), USDOE Letter 19-ECD-0028 (Reference 3) and the associated Class 3 LAWPS draft permit modification currently out for public comment (8C.2020.3D), and have determined that this request satisfies the criteria in Washington Administrative Code (WAC) 173-303-830(4)(e)(ii).

Pursuant to WAC 173-303-830(4)(e)(iii)(B)(III) and (V), Ecology agrees this TA will prevent disruption of ongoing waste management activities, and will facilitate treatment of Hanford DST waste resulting in the protection of human health and the environment.

Ecology only approves the following activities to be conducted by the Permittees under this specific TA:

- Place concrete for the foundations and pad supporting the TSCR Process Enclosure and Control Enclosure.
- Placement of the TSCR Process and Control Enclosures on the pad and anchoring them in place. Does not include hookup of the TSCR Process Enclosure to HIHTLs.

Based on the revised Permittee requested TA dates, detailed in Reference 2, and pursuant to WAC 173-303-830(4)(e), Ecology approves the TA activities described above for 180 days, effective July 8, 2020 through January 4, 2021.

While performing the work detailed under this TA approval, the Permittees are required to construct according to the design and engineering standards defined in the draft permit modification currently out for public comment, *Low Activity Waste Pretreatment System, OUG 1 Class 3 Modification*, (8C.2020.3D). In addition, the Permittees are also required to comply with draft permit conditions III.1.J General Requirements and III.1.P Tank Systems.

The current public comment period for the LAWPS OUG 1 Class 3 Modification is scheduled to conclude on August 7, 2020. At completion of the LAWPS OUG 1 Class 3 Permit Modification public comment period, Ecology will re-evaluate the two remaining bullets detailed in the Permittees TA Request #1, detailed above and in Reference 1 and 2. If Ecology approves the two remaining construction activities, we will detail that in a future approval letter.

After Ecology has reviewed and responded to all public comments received, Ecology will make a final permit decision as detailed in WAC 173-303-840(8). The final LAWPS OUG 1 permit will replace this TA approval and be incorporated in the Hanford Facility Resource Conservation and Recovery Act Permit, Dangerous Waste Portion, Revision 8C, for the Treatment, Storage and Disposal of Dangerous Waste, WA7890008967 (Site-Wide Permit).

When the final Class 3 modification permitting decision is made by Ecology and the LAWPS OUG 1 is added to the Site-Wide Permit and is effective, the Permittees will be required to be in compliance with all permit conditions detailed in the LAWPS, OUG 1 Permit.

USDOE provided Ecology an evaluation of the criteria and toxic air emissions associated with the TA requests for TSCR (Reference 4), including the activities described in TA Request #1. Ecology has evaluated the information provided by USDOE and determined that the potential emissions have been adequately evaluated under WAC 173-400-110(2), *New Source Review for sources and portable sources*. Based on our review Ecology has determined an approval order is not required for the work scope approved by this TA approval letter. USDOE intends to provide this evaluation formally to Ecology in a letter at a later date.

Brian T. Vance
July 8, 2020
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If there are any questions, please contact Suzanne Dahl, Tank Waste Treatment Section Manager, at suzanne.dahl@ecy.wa.gov or (509) 372-7892, or Mandy Jones, Permit Coordinator, at mandy.jones@ecy.wa.gov or (509) 372-7916.

Sincerely,

 Digitally signed by
Schleif, Stephanie
(ECY)

Stephanie Schleif
Deputy Program Manager
Nuclear Waste Program

mj/ag

References:

1. Letter 20-ECD-0010, dated March 11, 2020, "Submittal of the Request for Temporary Authorizations to Support the Low-Activity Waste Pretreatment System Operating Unit Group Permit"
2. E-mail from Mary E. Burandt, USDOE-ORP, to Yoana Lucatero and Mandy Jones, ECY, dated June 22, 2020, "TSCR TA # 1 Request"
3. Letter 19-ECD-0028, dated April 1, 2019, "Submittal of the Proposed Class 2 Modification of the Hanford Facility Dangerous Waste Part B Permit Application for the Low-Activity Waste Pretreatment System (TS-2-8)"
4. E-mail from Bryan Trimmerger, USDOE-ORP, to Lilyann Murphy, ECY, dated June 22, 2020, "TSCR TA Letter"

cc electronic:

Dave Bartus, USEPA
David Einan, USEPA
Mary Beth Burandt, USDOE-ORP
Lori Huffman, USDOE-ORP
Christopher Kemp, USDOE-ORP
Glyn Trenchard, USDOE-ORP
Jon Perry, MSA
Tom Beam, WRPS
James Hamilton, WRPS
Jeremy Hartley, WRPS
Eric Van Mason, WRPS
Mason Murphy, CTUIR
Jack Bell, NPT
Rex Buck, Jr., Wanapum
Laurene Contreras, YN
ERWM Staff, YN
Ken Niles, ODOE
Debra Alexander, Ecology
Jennifer Cantu, Ecology
Annette Carlson, Ecology
Suzanne Dahl, Ecology
Katie Hall, Ecology
Mandy Jones, Ecology
Yoana Lucatero, Ecology
Jeff Lyon, Ecology
Lily Murphy, Ecology
Alexandra Smith, Ecology
Dan Thompson, Ecology
NWP RIM Coordinators, Ecology
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