




JUL 07 2011

11-ESQ-144

CCN: 234649

Mr. Ted Sturdevant, Director
 Washington State
 Department of Ecology
 P.O. Box 47600
 Olympia, Washington 98504

Dear Mr. Sturdevant:

SUBMITTAL OF HANFORD FACILITY RESOURCE CONSERVATION AND RECOVERY ACT (RCRA) PERMIT MODIFICATION NOTIFICATION FORM 24590-WTP-PCN-ENV-11-003 TO UPDATE THE WASTE TREATMENT AND IMMOBILIZATION PLANT (WTP) COMPLIANCE SCHEDULE

- References:
1. Hanford Facility Resource Conservation and Recovery Act Permit (WA7890008967), Part III, Operating Unit 10, Unit-Specific Conditions, Waste Treatment and Immobilization Plant.
 2. Consent Decree and Tri-Party Agreement Settlement Package, order signed October 25, 2010, settling "State of Washington v. Chu," United States District Court, Eastern District of Washington, Case No. CV-08-5085-FVS. 0091889
 3. ORP letter from S. L. Samuelson to T. Sturdevant, Ecology, "Submittal of Hanford Tank Waste Treatment and Immobilization Plant (WTP) 2011 Progress Report," 11-ESQ-116/CCN: 230450, dated May 20, 2011. 00916837

Attached please find the Hanford Facility RCRA Permit Modification Notification Form, 24590-WTP-PCN-ENV-11-003. The form requests a Class 1 modification to Reference 1, requiring approval from the Washington State Department of Ecology (Ecology). The Permit Modification Notice Form updates the WTP Interim Compliance Schedule located in Appendix 1 of Reference 1.

The proposed changes to interim compliance dates and final compliance date are based on WTP Consent Decree milestones located in Appendix A, "WTP Consent Decree Milestones, Schedule, Assumptions," of Reference 2. Permit Condition II.X.2 allows extension of the final compliance date, when granted through the approved change control process identified in the Hanford Federal Facility Agreement and Consent Order.

The proposed interim compliance date and final compliance date were discussed with Ecology on May 17, 2011, prior to submittal of the WTP 2011 Progress Report (Reference 3).

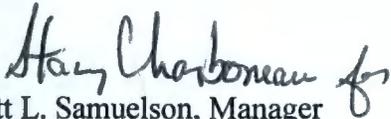
Mr. Ted Sturdevant
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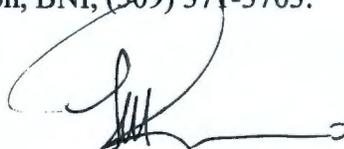
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If you have any questions, please contact Lori A. Huffman, Director, Environmental Compliance Division, (509) 376-0104, or Brad G. Erlandson, BNI, (509) 371-3703.



Scott L. Samuelson, Manager
Office of River Protection



F. M. Russo, Project Director
Bechtel National, Inc.

ESQ:GMN

Attachment

cc w/attach:

R. W. Bradford, BNI
R. E. Brown, BNI
W. T. Clements, BNI
S. S. Crawford, BNI
J. H. Dunkirk, BNI
B. G. Erlandson, BNI
P. A. Fisher, BNI
G. F. Futrell, BNI
R. S. Hajner, BNI
R. M. Kacich, BNI
W. S. Oxenford, BNI
R. L. Patterson, BNI
F. M. Russo, BNI
S. L. Sawyer, BNI
J. A. Scarpino, BNI
J. M. St. Julian, BNI
J. Cantu, Ecology
S. Dahl, Ecology
J. A. Hedges, Ecology
D. McDonald, Ecology
J. Wallace, Ecology
D. J. Sommer, North Wind
D. M. Busche, URS
J. M. Colby, URS
B. L. Curn, URS
Administrative Record (WTP H-0-8)
BNI Correspondence

Attachment
11-ESQ-144
(10 Pages)

24590-WTP-PCN-ENV-11-003

Quarter Ending 09/30/2011

24590-WTP-PCN-ENV-11-003

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

Index

- Page 2 of 2: Hanford Facility RCRA Permit, Part III, Operating Unit 10, Waste Treatment and Immobilization Plant
Replace Compliance Schedule in Appendix 1.0
- Appendix 1 WTP Interim Compliance Schedule Redline
- Appendix 2 WTP Interim Compliance Schedule with Changes Incorporated

Submitted by Co-Operator:

Donna Busche

D. M. Busche

7/1/11

Date

Reviewed by ORP Program Office:

D. L. Noyes

D. L. Noyes

7/6/11

Date

Quarter Ending 6/30/2011

24590-WTP-PCN-ENV-11-003

Hanford Facility RCRA Permit Modification Notification Form				
Unit: Waste Treatment and Immobilization Plant	Permit Part: Part III, Operating Unit 10			
<p><u>Description of Modification:</u> The purpose of this Class 1 prime modification is to replace the WTP Interim Compliance Schedule included in Appendix 1. The proposed changes to interim compliance dates and final compliance date are based on WTP Consent Decree milestones located in Appendix A, <i>WTP Consent Decree Milestones, Schedule, Assumptions</i>, of Consent Decree No. 08-5085-FVS. Permit Condition II.X.2 allows extension of the final compliance date, when granted through the approved change control process identified in the Hanford Federal Facility Agreement and Consent Order. Proposed changes are indicated in the markup included in Appendix 1. The revised Compliance Schedule, with changes incorporated, is included in Appendix 2.</p>				
WAC 173-303-830 Modification Class:	Class 1	Class ¹ 1	Class 2	Class 3
Please mark the Modification Class:		X		
<p>Enter relevant WAC 173-303-830, Appendix I Modification citation number: 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."</p>				
Modification Approved/Concur: <input type="checkbox"/> Yes <input type="checkbox"/> Denied (state reason below) <u>Reason for denial:</u>	Reviewed by Ecology: <div style="display: flex; justify-content: space-between; border-top: 1px solid black; padding-top: 5px;"> J. J. Wallace Date </div>			

**Appendix 1
(4 Pages)**

WTP Interim Compliance Schedule Redline/Strikeout

Attachment 51 - Appendix 1.0
WTP Interim Compliance Schedule

Interim Compliance Schedule- WTP Facility		
	Compliance Schedule Submittal	Interim Compliance Date
	III.10.C.2	
1.	Submit documentation stating the WTP has been constructed in compliance with the Permit.	03/01/0812/31/2018
2.	Submit updated Site Transportation Report for incorporation into the Administrative Record.	Complete
33.	Update and resubmit the Part A, Form 3 Permit Application.	Complete
34.	DELETED	DELETED
	III.10.C.3	
3.	Revise and Submit Waste Analysis Plan and associated Quality Assurance Project Plan to Ecology for review and approval	04/01/0712/30/2017
	III.10.C.5.	
4.	Update and submit for approval "Procedures to Prevent Hazards", Chapter 6.0 Sections 6.3, 6.4, 6.5 and the Inspection Schedule.	04/01/0712/30/2017
	III.10.C.6	
5.	Update and submit the Contingency Plan	04/01/0712/30/2017
	III.10.C.7	
6.	Update and resubmit for review and approval Training Program description in Chapter 8 of the Permit.	04/01/0712/30/2017
7.	Submit under separate cover the actual WTP Dangerous Waste Training Plan for incorporation into Administrative Record.	04/01/0712/30/2017
	III.10.C.8	
8.	Update and resubmit the Closure Plan for approval	04/01/0712/30/2017
	III.10.C.11	
9.	Submit Risk Assessment Workplan, revised in consultation with Ecology.	Complete
	III.10.C.15	
36.	Submit System Descriptions for Mechanical Handling Systems identified in Permit Table III.10.C.A, for incorporation into the Administrative Record.	Complete
37.	Submit Mechanical Handling Diagrams and Mechanical Handling Data Sheets for the following pieces of equipment: a. HDH-CRN-00005	Complete

Interim Compliance Schedule- WTP Facility		
	Compliance Schedule Submittal	Interim Compliance Date
	b. HEH-CRN-00003 c. HPH-CRN-00001 d. HPH-CRN-00002 e. HSH-CRN-00001 f. HSH-CRN-00014 g. LEH-CRN-00003 h. LPH-CRN-00002 i. HEH-CRN-00001	Complete
38.	Submit equipment instrument logic narrative description for mechanical handling equipment, as specified in Permit Condition III.10.C.15.a.ii.A.	<u>Prior to initial receipt of dangerous waste: 12/30/2017</u>
39.	Submit descriptions of operational procedures for mechanical handling systems, as specified in Permit Condition III.10.C.15.a.ii.B.	<u>Prior to initial receipt of dangerous waste: 12/30/2017</u>
CONTAINERS III.10.D.10		
10.	Submit detailed information associated with containers and container management areas	<u>03/22/06 12/20/2012</u>
11.	Submit descriptions of container management practices	<u>04/01/07 12/30/2017</u>
TANK SYSTEMS III.10.D.9		
12.	Submit engineering information for each secondary containment and leak detection system for the WTP Tank System to be included in the permit	<u>10/30/2005 Complete</u>
13.	Submit engineering information for each dangerous waste tank and primary sump to be included in the permit	<u>04/29/06 12/31/2017</u>
14.	Submit engineering information for each tank system ancillary equipment to be included in the permit	<u>04/29/06 12/31/2017</u>
15.	Submit descriptions of tank management practices	<u>04/01/07 12/30/2017</u>
40.	Submit WTP document <i>Pipe Stress Design Criteria including "Pipe Stress Criteria" and "Span Method Criteria,"</i> 24590-WTP-DC-PS-01-001.	Complete
CONTAINMENT BUILDINGS III.10.F.7		
16.	Submit engineering information for each containment building to be included in the permit	Complete
17.	Submit descriptions of containment building management practices	<u>04/01/07 12/30/2017</u>
PRETREATMENT PLANT MISC. UNITS		

Interim Compliance Schedule- WTP Facility		
	Compliance Schedule Submittal	Interim Compliance Date
SYSTEMS III.10.G.9		
18.	Submit engineering information for secondary containment and leak detection system for the Pretreatment Plant Miscellaneous Unit Systems	10/30/06 <u>Complete</u>
19.	Submit engineering information for Pretreatment Plant Miscellaneous Unit Systems	02/11/06 <u>12/31/2017</u>
20.	Submit engineering information for Pretreatment Plant Miscellaneous Unit Systems equipment	04/12/06 <u>12/31/2017</u>
21.	Submit descriptions of management practices for the Pretreatment Miscellaneous Treatment System	04/01/07 <u>06/30/2018</u>
LAW SHORT TERM MELTER UNIT III.10.H.5		
22.	Submit engineering information for LAW Vitrification Miscellaneous Treatment Unit secondary containment	Complete
23.	Submit engineering information for LAW Vitrification Miscellaneous Treatment Unit sub-system	08/18/06 <u>12/31/2014</u>
24.	Submit engineering information for equipment for each LAW Vitrification Miscellaneous Treatment Unit sub-system	Complete
25.	Submit descriptions of management practices for the LAW Vitrification Miscellaneous Treatment System	04/01/07 <u>06/30/2018</u>
26.	Submit LAW Vitrification Environmental Performance Demonstration Test Plan for Ecology review and approval	10/02/06 <u>01/01/2018</u>
HLW SHORT TERM MELTER UNIT III.10.J.5		
27.	Submit engineering information for HLW Vitrification Miscellaneous Treatment Unit secondary containment	Complete
28.	Submit engineering information for HLW Vitrification Miscellaneous Treatment Unit sub-system	Complete
29.	Submit engineering information for equipment for each HLW Vitrification Miscellaneous Treatment Unit sub-system	Complete
41.	Submit the following source drawings to complete HLW melter permit packages HLW-018 and HLW-019: ▪ P&ID <i>HLW Melter 1 System Film</i>	Complete

Interim Compliance Schedule- WTP Facility		
	Compliance Schedule Submittal	Interim Compliance Date
	<i>Cooler Utilities, 24590-HLW-M6-HMP-00012,</i> <ul style="list-style-type: none"> ▪ P&ID <i>HLW Melter 2 System Film Cooler Utilities, 24590-HLW-M6-HMP-20012,</i> ▪ HLW Melter Mechanical Drawings showing the melter physical attributes and overall dimensions. 	Complete
30.	Submit descriptions of management practices for the HLW Vitrification Miscellaneous Treatment System	04/01/07 <u>12/30/2017</u>
31.	Submit HLW Vitrification Environmental Performance Demonstration Test Plan for Ecology review and approval	10/02/06 <u>01/01/2018</u>
REPORT OF PROGRESS		
35.	Submit 2005 Report of Progress	Complete
42.	Submit 2007 Report of Progress	Complete
<u>43.</u>	<u>Submit 2010 Report of Progress</u>	<u>Complete</u>
<u>44.</u>	<u>Submit 2011 Report of Progress</u>	<u>Complete</u>
<u>45.</u>	<u>Update and resubmit Chapter 4, Process Information</u>	<u>12/30/2017</u>
FINAL COMPLIANCE DATE		
32.	Final Compliance Date	02/28/09 <u>12/31/2018</u>

Appendix 2
(4 Pages)

WTP Interim Compliance Schedule with Changes Incorporated

Attachment 51 - Appendix 1.0
WTP Interim Compliance Schedule

Interim Compliance Schedule- WTP Facility		
	Compliance Schedule Submittal	Interim Compliance Date
	III.10.C.2	
1.	Submit documentation stating the WTP has been constructed in compliance with the Permit.	12/31/2018
2.	Submit updated Site Transportation Report for incorporation into the Administrative Record.	Complete
33.	Update and resubmit the Part A, Form 3 Permit Application.	Complete
34.	DELETED	DELETED
	III.10.C.3	
3.	Revise and Submit Waste Analysis Plan and associated Quality Assurance Project Plan to Ecology for review and approval	12/30/2017
	III.10.C.5.	
4.	Update and submit for approval "Procedures to Prevent Hazards", Chapter 6.0 Sections 6.3, 6.4, 6.5 and the Inspection Schedule.	12/30/2017
	III.10.C.6	
5.	Update and submit the Contingency Plan	12/30/2017
	III.10.C.7	
6.	Update and resubmit for review and approval Training Program description in Chapter 8 of the Permit.	12/30/2017
7.	Submit under separate cover the actual WTP Dangerous Waste Training Plan for incorporation into Administrative Record.	12/30/2017
	III.10.C.8	
8.	Update and resubmit the Closure Plan for approval	12/30/2017
	III.10.C.11	
9.	Submit Risk Assessment Workplan, revised in consultation with Ecology.	Complete
	III.10.C.15	
36.	Submit System Descriptions for Mechanical Handling Systems identified in Permit Table III.10.C.A, for incorporation into the Administrative Record.	Complete
37.	Submit Mechanical Handling Diagrams and Mechanical Handling Data Sheets for the following pieces of equipment: a. HDH-CRN-00005	Complete

Interim Compliance Schedule- WTP Facility		
	Compliance Schedule Submittal	Interim Compliance Date
	b. HEH-CRN-00003 c. HPH-CRN-00001 d. HPH-CRN-00002 e. HSH-CRN-00001 f. HSH-CRN-00014 g. LEH-CRN-00003 h. LPH-CRN-00002 i. HEH-CRN-00001	Complete
38.	Submit equipment instrument logic narrative description for mechanical handling equipment, as specified in Permit Condition III.10.C.15.a.ii.A.	12/30/2017
39.	Submit descriptions of operational procedures for mechanical handling systems, as specified in Permit Condition III.10.C.15.a.ii.B.	12/30/2017
CONTAINERS III.10.D.10		
10.	Submit detailed information associated with containers and container management areas	12/20/2012
11.	Submit descriptions of container management practices	12/30/2017
TANK SYSTEMS III.10.D.9		
12.	Submit engineering information for each secondary containment and leak detection system for the WTP Tank System to be included in the permit	Complete
13.	Submit engineering information for each dangerous waste tank and primary sump to be included in the permit	12/31/2017
14.	Submit engineering information for each tank system ancillary equipment to be included in the permit	12/31/2017
15.	Submit descriptions of tank management practices	12/30/2017
40.	Submit WTP document <i>Pipe Stress Design Criteria including "Pipe Stress Criteria" and "Span Method Criteria,"</i> 24590-WTP-DC-PS-01-001.	Complete
CONTAINMENT BUILDINGS III.10.F.7		
16.	Submit engineering information for each containment building to be included in the permit	Complete
17.	Submit descriptions of containment building management practices	12/30/2017
PRETREATMENT PLANT MISC. UNITS		

Interim Compliance Schedule- WTP Facility		
	Compliance Schedule Submittal	Interim Compliance Date
SYSTEMS III.10.G.9		
18.	Submit engineering information for secondary containment and leak detection system for the Pretreatment Plant Miscellaneous Unit Systems	Complete
19.	Submit engineering information for Pretreatment Plant Miscellaneous Unit Systems	12/31/2017
20.	Submit engineering information for Pretreatment Plant Miscellaneous Unit Systems equipment	12/31/2017
21.	Submit descriptions of management practices for the Pretreatment Miscellaneous Treatment System	06/30/2018
LAW SHORT TERM MELTER UNIT III.10.H.5		
22.	Submit engineering information for LAW Vitrification Miscellaneous Treatment Unit secondary containment	Complete
23.	Submit engineering information for LAW Vitrification Miscellaneous Treatment Unit sub-system	12/31/2014
24.	Submit engineering information for equipment for each LAW Vitrification Miscellaneous Treatment Unit sub-system	Complete
25.	Submit descriptions of management practices for the LAW Vitrification Miscellaneous Treatment System	06/30/2018
26.	Submit LAW Vitrification Environmental Performance Demonstration Test Plan for Ecology review and approval	01/01/2018
HLW SHORT TERM MELTER UNIT III.10.J.5		
27.	Submit engineering information for HLW Vitrification Miscellaneous Treatment Unit secondary containment	Complete
28.	Submit engineering information for HLW Vitrification Miscellaneous Treatment Unit sub-system	Complete
29.	Submit engineering information for equipment for each HLW Vitrification Miscellaneous Treatment Unit sub-system	Complete
41.	Submit the following source drawings to complete HLW melter permit packages HLW-018 and HLW-019: <ul style="list-style-type: none"> ▪ P&ID <i>HLW Melter 1 System Film</i> 	Complete

Interim Compliance Schedule- WTP Facility		
	Compliance Schedule Submittal	Interim Compliance Date
	<i>Cooler Utilities, 24590-HLW-M6-HMP-00012,</i> <ul style="list-style-type: none"> ▪ <i>P&ID HLW Melter 2 System Film Cooler Utilities, 24590-HLW-M6-HMP-20012,</i> ▪ <i>HLW Melter Mechanical Drawings showing the melter physical attributes and overall dimensions.</i> 	Complete
30.	Submit descriptions of management practices for the HLW Vitrification Miscellaneous Treatment System	12/30/2017
31.	Submit HLW Vitrification Environmental Performance Demonstration Test Plan for Ecology review and approval	01/01/2018
REPORT OF PROGRESS		
35.	Submit 2005 Report of Progress	Complete
42.	Submit 2007 Report of Progress	Complete
43.	Submit 2010 Report of Progress	Complete
44.	Submit 2011 Report of Progress	Complete
45.	Update and resubmit Chapter 4, Process Information	12/30/2017
FINAL COMPLIANCE DATE		
32.	Final Compliance Date	12/31/2018