



STATE OF WASHINGTON  
**DEPARTMENT OF ECOLOGY**

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**COVERSHEET**  
**Proposed Permit Modification**

For Letter 21-NWP-015  
Dated February 2, 2021

Re: Proposed Class 3 Permit Modification 8C.2020.6D 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 4, 242-A Evaporator, WA7890008967

Due to the Governor's "Safe Start" Order, the Department of Ecology (Ecology) cannot distribute hard copy letters or enclosures, including DVDs, at this time. All letters are being sent electronically with embedded links to the enclosures.

The enclosures are on the Ecology website at <https://ecology.wa.gov/Waste-Toxics/Nuclear-waste/Public-comment-periods>.

After the Order is lifted, Ecology will send all hard copy letters and associated hard copy enclosures or DVDs as appropriate.



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February 2, 2021

21-NWP-015

Brian T. Vance, Manager  
Office of River Protection  
United States Department of Energy  
PO Box 450, MSIN: H6-60  
Richland, Washington 99352

John R. Eschenberg, President  
Washington River Protection Solutions  
PO Box 850, MSIN: H3-21  
Richland, Washington 99352

Re: Proposed Class 3 Permit Modification 8C.2020.6D 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 4, 242-A Evaporator, WA7890008967

Reference: See page 3

Dear Brian T. Vance and John R. Eschenberg:

This letter transmits the Department of Ecology's (Ecology) proposed Class 3 Permit Modification 8C.2020.6D to Part III, Operating Unit Group 4, 242-A Evaporator, of the *Hanford Facility Resource Conservation and Recovery Act Permit, Dangerous Waste Portion, Revision 8C, for the Treatment, Storage, and Disposal of Dangerous Waste*.

The Permittees are the United States Department of Energy (USDOE) as owner/operator and Washington River Protection Solutions (WRPS) as co-operator.

USDOE proposed a Class 2 Permit Modification to the 242-A Evaporator on May 7, 2020 (Reference 1). USDOE held a public comment period from May 8, 2020, through July 7, 2020. A virtual public meeting was held on June 8, 2020. Ecology performed a completeness determination and a technical review following the 60-day public comment period.

In the review, Ecology identified two independent qualified, registered professional engineer (IQRPE) integrity assessments that should have been provided for Ecology's review. Since Ecology did not receive the integrity assessments in time to make a decision on the Class 2 Permit Modification, Ecology reclassified the modification to a Class 3. Due to missing permit documentation in support of the comment period (Reference 2), Ecology felt the documentation should be available for public review.

The design assessments are certified by an IQRPE, and are separated into two reports. They were submitted on August 26, 2020, as required by Washington Administrative Code (WAC) 173-303-640(3)(a). Ecology identified technical issues with the design assessment. Ecology worked with the Permittees to resolve these issues (Reference 3).

No revisions were made to the original Class 2 Permit Modification (Reference 1). However, the IQRPE design assessments are provided with this permit modification as supporting documentation.

Ecology received 13 public comments from USDOE's comment period. Ecology's *Response to Comments* document is on the enclosed DVD (Ecology Publication 21-05-004 and on Ecology's publication website at <https://apps.ecology.wa.gov/publications/summarypages/2105004.html>).

WAC 173-303-840(3)(d) requires a 45-day public comment period for the draft permit modification. Ecology will hold this public comment period from February 8, 2021, through March 25, 2021. This comment period initiates the second portion of the Class 3 Permit Modification. A public hearing is not scheduled, but Ecology will consider holding one if there is enough interest.

The proposed Class 3 Permit Modification would allow 242-A Evaporator to make facility changes to support installation of three new DST System transfer lines from AW-Farm. These proposed changes include drilling new penetrations through the wall, installing new wall nozzles, and reconfiguring jumpers in the pump room.

The proposed permit modification is on the enclosed DVD and on Ecology's website at <https://ecology.wa.gov/Waste-Toxics/Nuclear-waste/Public-comment-periods>. A DVD is also at the Hanford Public Information Repositories in Richland, Spokane and Seattle, Washington and in Portland, Oregon. A hard copy is on file at the locations below:

Department of Ecology  
Nuclear Waste Program  
3100 Port of Benton Boulevard  
Richland, Washington 99354

United States Department of Energy  
Administrative Record  
2440 Stevens Center Place  
Richland, Washington 99354

Individuals can request copies of the DVD and hard copies by contacting Ecology's Resource Center at (509) 372-7950.

If there are any questions, please contact Andrew Pomiak, 242-A Evaporator Permit Lead, at [andrew.pomiak@ecy.wa.gov](mailto:andrew.pomiak@ecy.wa.gov) or (509) 372-7942, or Jeff Lyon, 242-A Evaporator Project Manager, at [jeff.lyon@ecy.wa.gov](mailto:jeff.lyon@ecy.wa.gov) or (509) 372-7914.

Sincerely,



Digitally signed by  
Schleif, Stephanie  
(ECY)

Stephanie Schleif  
Deputy Program Manager  
Nuclear Waste Program

ap/aa  
Enclosure

cc: See page 4

References:

1. Letter 20-ECD-0018, dated May 6, 2020, "Submittal of Class 2 Permit Modification to the Hanford Facility Resource Conservation and Recovery Act Permit, Dangerous Waste Portion for the 242-A Evaporator [T-2-6]"
2. Letter 20-NWP-150, dated September 4, 2020, "Reclassification of Proposed Class 2 Permit Modification C2-242-A-2020-01 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 4, 242-A Evaporator WA7890008967"
3. Letter 21-NWP-004, dated January 8, 2021, "Closing the Technical Review of C2-242-A-2020-01, the 242-A Evaporator Class 3 Permit Modification for Wall Penetrations 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 4, 242-A Evaporator WA7890008967"

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