



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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**COVERSHEET**

For Letter 20-NWP-083

Dated June 18, 2020

Re: Proposed Class 3 Permit Modification, 8C.2020.3D to the *Hanford Facility Resource Conservation and Recovery Act Permit, Dangerous Waste Portion, Revision 8C, for the Treatment, Storage, and Disposal of Dangerous Waste* (Site-wide Permit), Part III, Operating Unit Group 1, Low-Activity Waste Pretreatment System (LAWPS), WA7890008967

Due to the Governor's "Stay Home, Stay Healthy" Order, 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 located at the Ecology website <https://ecology.wa.gov/Waste-Toxics/Nuclear-waste/Public-comment-periods>. After the Order is lifted, Ecology will place all hard copy letters and associated hard copy enclosures or DVDs in the appropriate document repositories.



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June 18, 2020

20-NWP-083

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: H3-04  
Richland, Washington 99352

Re: Proposed Class 3 Permit Modification, 8C.2020.3D to the *Hanford Facility Resource Conservation and Recovery Act Permit, Dangerous Waste Portion, Revision 8C, for the Treatment, Storage, and Disposal of Dangerous Waste* (Site-wide Permit), Part III, Operating Unit Group 1, Low-Activity Waste Pretreatment System (LAWPS), WA7890008967

References: See page 3

Dear Brian T. Vance and John R. Eschenberg:

This letter transmits the proposed permit modification 8C.2020.3D to Part III, Operating Unit Group 1 (OUG 1), Low-Activity Waste Pretreatment System (LAWPS), to the *Hanford Facility Resource Conservation and Recovery Act Permit, Dangerous Waste Portion, Rev 8C, for the Treatment, Storage, and Disposal of Dangerous Waste*.

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

USDOE-ORP held a 60-day public comment period regarding the proposed Class 3 Permit Modification request for the LAWPS OUG 1 from May 1, 2019 through June 30, 2019 (Reference 1). USDOE-ORP held a public meeting on May 29, 2019, at the Richland Public Library. Ecology received four public comment submittals during USDOE-ORP's comment period.

Ecology performed a completeness determination and technical review as required in Washington Administration Code (WAC) 173-303-840(1)(b) (References 2 and 4) and determined the permit application incomplete. Ecology documented the technical deficiencies as well as additional items through a Response Comment Record. After receiving additional documentation from the Permittees that made the application complete (Reference 3), Ecology worked with the Permittees to resolve the technical deficiencies. The Permittees submitted a revised set of final files on April 16, 2020 (Reference 5) to support the permit modification.

Ecology has determined that this permit application is complete and has made the following modifications to support the development of the draft permit:

- Added Appendices with supporting design media (specifications, calculations, reports, and engineering drawings).
- Added Unit-Specific Permit Conditions focused on the construction, and operation requirements found in WAC 173-303-630, Use and management of containers and WAC 173-303-640, Tank systems.
- Added two new Interim Compliance Schedule Items, LAWPS-1 and LAWPS-2 to support the long-term disposal of the Ion Exchange Columns and receipt of additional technical details necessary to support operations of the LAWPS OUG.

Ecology issued a *Response to Comments* document from USDOE-ORP's public comment period. Ecology's *Response to Comments* document is provided on the enclosed DVD (Ecology Publication 20-05-017) and on Ecology's website at <https://fortress.wa.gov/ecy/publications/SummaryPages/2005017.html>.

WAC 173-303-840(3)(d) requires at least a 45-day public comment period for a draft permit. Ecology will hold a public comment period from June 22, 2020 through August 7, 2020. 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 add the LAWPS OUG 1, to the Site-wide Permit. The proposed modification (8C.2020.3D) provides design and construction details for the LAWPS OUG 1.

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 available at the Hanford Public Information Repositories in Richland, Spokane, and Seattle, Washington, as well as Portland, Oregon. A hard copy is on file at the locations listed 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 by contacting Ecology's Resource Center at (509) 372-7950.

If there are any questions, please contact Yoana Lucatero, Lead Permit Writer, at (509) 372-7917 or [yluc461@ecy.wa.gov](mailto:yluc461@ecy.wa.gov) or Mandy Jones, Permit Coordinator, at (509) 372-7916 or [mjon461@ecy.wa.gov](mailto:mjon461@ecy.wa.gov).

Sincerely,

 Digitally signed by  
Schleif, Stephanie  
(ECY)

Stephanie Schleif  
Deputy Program Manager  
Nuclear Waste Program

y/ag  
Enclosure

cc: See page 4

References:

1. Letter 19-ECD-0028, dated April 1, 2019, "Submittal of the Proposed Class 3 Modification of the Hanford Facility Dangerous Waste Part B Permit Application for the Low-Activity Waste Pretreatment System (TS-2-8)"
2. Letter 19-NWP-103, dated July 3, 2019, "Department of Ecology's (Ecology) Completeness Review for the Class 3 Modification to the *Hanford Facility Resource Conservation and Recovery Act Permit, Dangerous Waste Portion, Rev 8C, for the Treatment, Storage, and Disposal of Dangerous Waste*, Part III, Operating Unit Group 1, Low-Activity Waste Pretreatment System (LAWPS), WA7890008967"
3. Letter 19-ECD-0079, dated October 31, 2019, "Submittal of Additional Technical and Design Information for the Dangerous Waste Part B Permit Application for the Low-Activity Waste Pretreatment System (TS-2-8)"
4. Letter 20-NWP-034, dated February 14, 2020, "Technical Review for the Class 3 Modification to the *Hanford Facility Resource and Recovery Act Permit, Dangerous Waste Portion, Rev. 8C, for the Treatment, Storage, and Disposal of Dangerous Waste*, Part III, Operating Unit Group 1, Low-Activity Waste Pretreatment System (LAWPS), WA7890008967"
5. Letter 20-ECD-0019, dated April 16, 2020, "Submittal of Responses to Technical Review Comments on the Class 3 Modification for the Hanford Facility Dangerous Waste Part B Permit Application for the Low-Activity Waste Pretreatment System (TS-2-8)"

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CHPRC Correspondence Control  
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Hanford Site-wide Permit  
Hanford Facility Operating Record  
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Portland State University Library,  
Government Information  
University of Washington Suzzallo Library,  
Government Publications  
USDOE-ORP Correspondence Control  
USDOE Public Reading Room, CIC  
USDOE-RL Correspondence Control  
USEPA Region 10 Hanford Field Office,  
Correspondence Control  
WRPS Correspondence Control

cc w/enc, DVD and hard copy:

Hanford Administrative Record: Hanford Site-wide Permit  
NWP Central File