



OFFICE OF RIVER PROTECTION

P.O. Box 450, MSIN H6-60
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1222341

NOV 27 2013



13-ECD-0086

CCN: 262101

Ms. Jane A. Hedges, Program Manager
Nuclear Waste Program
Washington State
Department of Ecology
3100 Port of Benton Blvd.
Richland, Washington 99354

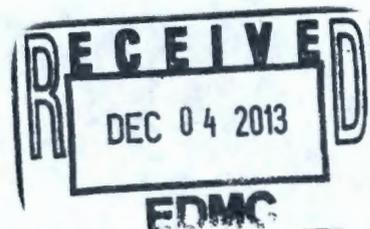
Ms. Hedges:

COMMENTS ON THE PROPOSED PERMIT MODIFICATION OF 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 10, WASTE TREATMENT AND IMMOBILIZATION PLANT, WA7890008967*

Reference: Ecology letter from J. Hedges to K. Smith, ORP, F. Armijo, MSA, M. McCormick, RL, M. Schlender, PNNL, P. McCullough, BNI, J. Fulton, CH2M HILL, C. Johnson, WCH, and D. Olson, WRPS, "Proposed Permit Modification of 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 10, Waste Treatment and Immobilization Plant, WA7890008967*," 13-NWP-104, dated October 9, 2013.

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The U.S. Department of Energy, Office of River Protection and Bechtel National, Inc. appreciate the opportunity to comment on the proposed permit modification. Comments on the proposed permit modification are provided in Attachments 1, 2, and 3.



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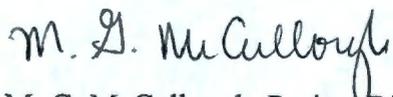
Ms. Jane A. Hedges
13-ECD-0086

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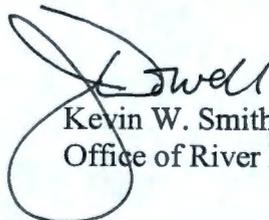
NOV 27 2013

CCN: 262101

If you have any questions, please contact Lori A. Huffman, Director, Environmental Compliance Division, ORP, (509) 376-0104, or Brad G. Erlandson, BNI, Environmental Manager (509) 371-2182.



M. G. McCullough, Project Director
Bechtel National, Inc.



Kevin W. Smith, Manager
Office of River Protection
FOR

ECD:LAH

Attachments: (3)

cc w/attachs:

F. Beranek, BNI

D.M. Busche, BNI

B.L. Curn, BNI

R.J. Landon, BNI

G.W. Ryan, BNI

Administrative Record (WTP H-0-8)

BNI Correspondence

Environmental Portal, LMSI

cc w/o attachs:

L.W. Baker, BNI

S.S. Crawford, BNI

J.H. Dunkirk, BNI

S. Hajner, BNI

K.D. Irwin, BNI

M.G. McCullough, BNI

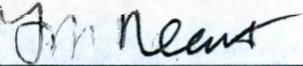
W.S. Oxenford, BNI

E.F. Sproat, III, BNI

J.M. St. Julian, BNI

Attachment 1
13-ECD-0086
CCN: 262101
(5 Pages)

Comments on Proposed Permit Modification
Leak Detection Notification (new condition)



Gae M. Neath



TOPIC: Leak detection notification (new condition)

CONDITION NO: III.10.E.9.e.ii.D and III.10.H.5.e.ii.D

CONDITION TEXT: **The permittee must notify Ecology at the earliest practical moment after any leak occurs as required in WAC 173-303-640(4)(c)(iii).**

COMMENT: The Permittees request that Ecology delete this condition from the permit.

BASIS:

1. No basis in regulation.
2. Vague and subjective language; requires interpretation; applicability unclear.
3. Unnecessary and redundant; Permit already requires notification and reporting.
4. Inaccurate regulatory citation.

DISCUSSION: No basis in regulation. This condition should be deleted, because no basis has been offered in the Permit, Statement of Basis, or other documents that supports the de facto use of omnibus authority. No basis for use of omnibus authority has been provided.

Although WAC 173-303-640(4)(c)(iii) was cited as a basis, it is not applicable, because this WAC requirement does not address notification. The State has failed to demonstrate that this condition is necessary to achieve compliance with the Hazardous Waste Management Act or that the condition is necessary "to protect human health and the environment." The WAC 173-303-640(7)(d) requires a permittee to notify the State of a leak or release *to the environment*; there is no regulatory requirement to notify the agency of a leak into secondary containment. This condition is arbitrary and is not required by the cited regulation. In addition, other conditions address releases to secondary containment.

Washington law prohibits the arbitrary exercise of power by a state agency. Imposing requirements that exceed an agency's statutory or regulatory authority constitutes arbitrary action. To the extent that Ecology has imposed conditions under the permit that exceed Ecology's authority, it has acted in an arbitrary manner. Accordingly, those conditions which have been arbitrarily imposed under the permit should be stricken as the product of impermissible and arbitrary agency action.

Vague and subjective; requires interpretation; applicability unclear. The words "any" and "earliest practical moment" are undefined and rely on individual judgment by both regulators and facility operators that creates a "compliance trap".

Applicability of the condition is also unclear. The condition was added as part of new conditions *exempting* from leak detection criteria certain sealed penetrations



(PEN seal) in the LAW facility only and presumably was intended to apply only to the LAW PEN seals listed in Tables III.10.E.Q and III.10.H.G. However, because this new condition is under the leak detection conditions for tanks and LAW miscellaneous units, the notification requirement arguably applies to all "leaks," not just those from a PEN seal. As written, the condition would apply not only to LAW miscellaneous units, but also to all facilities' tank systems regardless of PEN seals.

The State's intent and applicability of this condition is unclear and confusing.

Unnecessary and redundant. The permit conditions III.10.E.5.j., III.10.F.3.d.i., III.10.G.5.k., III.10.H.1.a.xxiv., III.10.I.1.a.xviii., III.10.J.1.a.xxiv., and III.10.K.1.a.xviii. require that the Permittees notify Ecology in 24 hours *if* liquids in secondary containment cannot be removed within 24 hours after detection. The proposed condition that Permittees notify Ecology "at the earliest practical moment after any leak" adds an unnecessary administrative burden that is adequately addressed with existing conditions and fails to demonstrate any additional protection of human health or the environment.

The following existing permit conditions require that Permittees notify Ecology when liquids are in secondary containment and cannot be removed in 24 hours:

III.10.E.5.j for tank systems

If liquids (e.g., dangerous and/or mixed waste leaks and spills, precipitation, fire water, liquids from damaged or broken pipes) cannot be removed from the secondary containment system within twenty-four (24) hours, Ecology will be verbally notified within twenty-four (24) hours of discovery. The notification will provide the information in A, B and C listed below. The Permittees will provide Ecology with a written demonstration within seven (7) business days identifying at a minimum [WAC 173-303-640(4)(c)(iv), WAC 173-303-640(7)(b)(ii), WAC 173-303-806(4)(c)(vii)]:

- A. *Reasons for delayed removal;*
- B. *Measures implemented to ensure continued protection of human health and the environment;*
- C. *Current actions being taken to remove liquids from secondary containment.*

III.10.F.3.d.i. for containment buildings

Upon detection of a condition that has led to the release of dangerous and/or mixed waste (e.g., upon detection of leakage from the primary barrier) the Permittees must:

- A. *Enter a record of the discovery in the facility operating record;*
- B. *Immediately remove the portion of the containment building unit*



affected by the condition from service;

- C. Determine what steps must be taken to repair the containment building unit, remove any leakage from the secondary collection system, and establish a schedule for accomplishing the cleanup and repairs; and*
- D. Within seven (7) days after the discovery of the condition, notify Ecology of the condition, and within fourteen (14) working days, provide a written notice to Ecology with a description of the steps taken to repair the containment building unit, and the schedule for accomplishing the work.*

III.10.G.5.k for Pretreatment Miscellaneous Units (MU)

If liquids (e.g., dangerous and/or mixed waste leaks and spills, precipitation, fire water, liquids from damaged or broken pipes) cannot be removed from the secondary containment system within twenty-four (24) hours, Ecology will be verbally notified within twenty-four (24) hours of discovery. The notification will provide the information in A, B and C listed below. The Permittees will provide Ecology with a written demonstration within seven (7) business days identifying at a minimum [WAC 173-303-640(4)(c)(iv), WAC 173-303-640(7)(b)(ii), in accordance with WAC 173-303-680(3) and WAC 173-303-806(4)(i)(i)(B)]:

- A. Reasons for delayed removal;*
- B. Measures implemented to ensure continued protection of human health and the environment;*
- C. Current actions being taken to remove liquids from secondary containment*

III.10.H.1.a.xxiv for LAW Vit/MU (short term)

If liquids (e.g., dangerous and/or mixed waste leaks and spills, precipitation, fire water, liquids from damaged or broken pipes) cannot be removed from the secondary containment system within twenty-four (24) hours, Ecology will be verbally notified within twenty-four (24) hours of discovery. The notification will provide the information in A, B and C, listed below. The Permittees will provide Ecology with a written demonstration within seven (7) business days identifying at a minimum [WAC 173-303-640(4)(c)(iv), WAC 173-303-640(7)(b)(ii), in accordance with WAC 173-303-680(3) and WAC 173-303-806(4)(i)(i)(B)]:

- A. Reasons for delayed removal;*
- B. Measures implemented to ensure continued protection of human health and the environment;*
- C. Current actions being taken to remove liquids from secondary containment.*



III.10.I.1.a.xviii for LAW Vit/MU (long term)

If liquids (e.g., dangerous and/or mixed waste leaks and spills, precipitation, fire water, liquids from damaged or broken pipes) cannot be removed from the secondary containment system within twenty-four (24) hours, Ecology will be verbally notified within twenty-four (24) hours of discovery. The notification will provide the information in A, B and C listed below. The Permittees will provide Ecology with a written demonstration within seven (7) business days identifying at a minimum [WAC 173-303-640(4)(c)(iv), WAC 173-303-640(7)(b)(ii), in accordance with WAC 173-303-680(3) and WAC 173-303-806(4)(i)(i)(B)]:

- A. *Reasons for delayed removal;*
- B. *Measures implemented to ensure continued protection of human health and the environment;*
- C. *Current actions being taken to remove liquids from secondary containment.*

III.10.J.1.a.xxiv for HLW Vit/MU (short term)

If liquids (e.g., dangerous and/or mixed waste leaks and spills, precipitation, fire water, liquids from damaged or broken pipes) cannot be removed from the secondary containment system within twenty-four (24) hours, Ecology will be verbally notified within twenty-four (24) hours of discovery. The notification will provide the information in A, B and C listed below. The Permittees will provide Ecology with a written demonstration within seven (7) business days identifying at a minimum [WAC 173-303-640(4)(c)(iv), WAC 173-303-640(7)(b)(ii), in accordance with WAC 173-303-680(3) and WAC 173-303-806(4)(i)(i)(B)]:

- A. *Reasons for delayed removal;*
- B. *Measures implemented to ensure continued protection of human health and the environment;*
- C. *Current actions being taken to remove liquids from secondary containment.*

III.10.K.1.a.xviii for HLW Vit/MU (long term)

If liquids (e.g., dangerous and/or mixed waste leaks and spills, precipitation, fire water liquids from damaged or broken pipes) cannot be removed from the secondary containment system within twenty-four (24) hours, Ecology will be verbally notified within twenty-four (24) hours of discovery. The notification will provide the information in A, B and C listed below. The Permittees will provide Ecology with a written demonstration within seven (7) business days identifying at a minimum [WAC 173-303-640(4)(c)(iv), WAC 173-303-640(7)(b)(ii), in accordance with WAC 173-303-680(3) and WAC



HANFORD TANK WASTE
TREATMENT AND
IMMOBILIZATION PLANT
(WTP)

**DANGEROUS WASTE PERMIT
DRAFT PERMIT MODIFICATION OCTOBER 2013
WTP Comments**

173-303-806(4)(i)(i)(B)]:

- A. Reasons for delayed removal;*
- B. Measures implemented to ensure continued protection of human health and the environment;*
- C. Current actions being taken to remove liquids from secondary containment.*

Inaccurate regulatory citation. There are no notification requirements at WAC 173-303-640(4)(c)(iii).

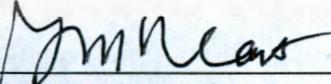
ALTERNATIVES: No alternative language suggested; please delete condition in its entirety.

REFERENCE(S): No WAC reference found that requires Permittees to notify Ecology of liquids in secondary containment.

Attachment 2
13-ECD-0086
CCN: 262101
(2 Pages)

Comments on Proposed Permit Modification

Removal of Permit Conditions Regarding the Correction to 7% Oxygen



Gae M. Neath



TOPIC: Removal of Permit Conditions regarding the correction to 7% oxygen

CONDITION NO(S): III.10.H.5.f.v.K & III.10.J.5.f.v.K

CONDITION TEXT: Documentation based on current WTP Unit design either confirming the Permittees' demonstration that it is not technically appropriate to correct standards listed in Permit Conditions III.10.H.1.b.ii. through III.10.H.1.b.ix. to seven (7) percent oxygen, or a request, pursuant to Permit Conditions III.10.C.9.e. and III.10.C.9.f., to update Permit Conditions III.10.H.1.b.ii. through III.10.H.1.b.ix., III.10.I.b.ii. through III.10.I.b.ix., III.10.I.1.e.iii., and III.10.H.1.e.iii., Permit Tables III.10.H.C, III.10.H.F, III.10.I.C., III.10.I.F. and Operating Unit Group 10, Appendix 9.0 to reflect the addition of an oxygen monitor and the correction of the standards to seven percent (7%) oxygen.

Documentation based on current WTP Unit design either confirming the Permittees' demonstration that it is not technically appropriate to correct standards listed in Permit Conditions III.10.J.b.ii. through III.10.J.b.ix. to seven percent (7%) oxygen, or a request, pursuant to Permit Conditions III.10.C.9.e. and III.10.C.9.f., to update Permit Conditions III.10.J.b.ii. through III.10.J.b.ix., III.10.K.b.ii. through III.10.K.b.ix., III.10.K.e.iii., and III.10.J.1.e.iii., Permit Tables III.10.J.C, III.10.J.F, III.10.K.C., III.10.K.F, and Operating Unit Group 10, Appendix 10.0 to reflect the addition of an oxygen monitor and the correction of the standards to seven percent (7%) oxygen.

COMMENT: The Permit Conditions requiring addition of an oxygen monitor and correcting to 7% oxygen need to be removed from the WTP DWP based on technical demonstration provided and previous agreement with Ecology in September 2002.

BASIS: Permittees met the requirements for Permit Conditions III.10.H.5.f.v.K and III.10.J.5.f.v.K prior to the initial effective date of the WTP DWP in September 2002 by providing the required supplemental technical information in the letter dated May 8, 2002 (02-EMD-031 and CCN 33396), *Modification of Hanford Facility Dangerous Waste Permit for the River Protection Project Waste Treatment and Immobilization Plant, WTP Supplemental Information*. Ecology accepted the WTP provided justification for not applying the requirement for correction to 7% oxygen.

Ecology documented its decision in WTP DWP Fact Sheet 01-05-006 that was issued in September 2002 per Sections 3.5.6 and 3.5.7 (pg. 27), which states:

“Air is used in the LAW and HLW Vitrification Systems to operate components, provide negative pressure control, and ventilate process vessels. Compared to an incinerator, the consumption of oxygen in the



**DANGEROUS WASTE PERMIT
DRAFT PERMIT MODIFICATION OCTOBER 2013
WTP Comments**

melters is not significant as the melters use electrical heating instead of fossil fuel to process the waste. The lack of significant consumption of oxygen in the melters combined with the large inputs of air into the LAW and HLW Vitrification Systems to operate components, provide negative pressure control, and ventilate process vessels, results in high oxygen levels in the LAW and HLW Vitrification Systems' exhaust. The standard correction of emission standards to 7% oxygen for incinerators is not being applied to the LAW and HLW Vitrification Systems, as it is technically inappropriate."

DISCUSSION: N/A

ALTERNATIVES: N/A

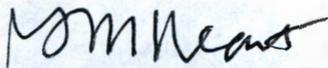
REFERENCE(S): Letter, Boston H. L. ORP, to Wilson M.A., Ecology, *Modification of Hanford Facility Dangerous Waste Permit for the River Protection Project Waste Treatment and Immobilization Plant, WTP Supplemental Information*, dated May 8, 2002 (02-EMD-031 and CCN 33396).

Ecology Publication Number 01-05-006, *Fact Sheet for the Hanford Facility Resource Conservation and Recovery Act Draft Permit for the Treatment, Storage, and Disposal of Dangerous Waste*" (CCN 42918).

Attachment 3
13-ECD-0086
CCN: 262101
(5 Pages)

Comments on Proposed Permit Modification

General Comment



Gae M. Neath



GENERAL COMMENT:

Since the WTP Permit was issued in September 2002, approximately 1300 detailed engineering drawings and documents have been provided, consistent with the Permit requirements. Ecology incorporates this technical information into the Permit, including updates as design changes are proposed and the Permit is modified. In addition to the technical information, the Permit contains 63 Tables that include summary of key design features for each permitted unit along with the equipment identification numbers, room locations, capacity, type, dimensions, materials of construction, etc.

Based on the Permit requirements, Permittees submit modifications to maintain the technical information and Permit Tables current with the approved design changes. As a result, the Permit Tables, Chapters, and Appendices are continuously being revised repeating the same changes in many places in the Permit. For example, each facility sump design information is addressed in several engineering documents (such as sump data, leak detection, waste removal, system logic description documents), drawings, and at least three to five Permit Tables, depending on the facility. We are concerned that the WTP Permit structure, where one has to repeat the same technical information for each permitted unit in several places, is not the most efficient or transparent format and creates the potential for errors and omissions making the Permit inconsistent with itself (see the comments listed below) which may raise compliance questions.

Permittees propose that Ecology re-structure or streamline the WTP Permit by consolidating all technical information currently contained in the Permit Chapters, Tables, and Appendices in one place within the WTP Permit.

CORRECTIONS, ERRORS, AND OMISSIONS

ITEM (01):

DWP Table III.10.E.A

Page 55 of 362 – Replace Piping and Instrumentation Diagram (P&ID) 24590-PTF-M6-FRP-00009, Rev 3, with 24590-PTF-M6-FRP-00009001, Rev 0, in accordance with the approved permit modification 24590-PTF-PCN-ENV-12-006.

ITEM (02):

DWP Table III.10.E.A

Page 55 of 362 – Replace P&ID 24590-PTF-M6-FRP-00010, Rev 3, with 24590-PTF-M6-FRP-00010001, Rev 0, in accordance with the approved permit modification 24590-PTF-PCN-ENV-12-006.

ITEM (03):

DWP Table III.10.E.A

Page 65 of 362 – Replace Rev 0 with Rev 1 for the following P&IDs in accordance with the approved permit modification 24590-PTF-PCN-ENV-12-013:

--24590-PTF-M6-HLP-00001003
--24590-PTF-M6-HLP-00002002



HANFORD TANK WASTE
TREATMENT AND
IMMOBILIZATION PLANT
(WTP)

**DANGEROUS WASTE PERMIT
DRAFT PERMIT MODIFICATION OCTOBER 2013
WTP Comments**

--24590-PTF-M6-HLP-00003002
--24590-PTF-M6-HLP-00003003

ITEM (04): DWP Table III.10.E.A

Page 65 of 362 – Replace Rev 0 with Rev 1 for the following P&IDs in accordance with the approved permit modification 24590-PTF-PCN-ENV-12-013:

--24590-PTF-M6-HLP-00001003
--24590-PTF-M6-HLP-00002002
--24590-PTF-M6-HLP-00003002
--24590-PTF-M6-HLP-00003003

ITEM (05): DWP Table III.10.E.A

Page 65 of 362 – Add P&ID 24590-PTF-M6-HLP-00001004, Rev 0, in accordance with the approved permit modification 24590-PTF-PCN-ENV-12-013.

ITEM (06): DWP Table III.10.E.A

Page 73 of 362 – Add P&ID 24590-PTF-M6-TCP-00001003, Rev 0, in accordance with the approved permit modification 24590-PTF-PCN-ENV-12-006.

ITEM (07): DWP Table III.10.E.A

Page 74 of 362 – Add P&ID 24590-PTF-M6-TLP-00006001, Rev 0, in accordance with the approved permit modification 24590-PTF-PCN-ENV-12-004.

ITEM (08): DWP Table III.10.E.A

Page 77 of 362 – Replace P&D 24590-PTF-M5-V17T-0002204, Rev 2, with Rev 3, in accordance with the approved permit modification 24590-PTF-PCN-ENV-12-013.

ITEM (09): DWP Table III.10.E.A

Page 83 of 362 – Delete P&ID 24590-PTF-M6-PVP-P0009, Rev 0, in accordance with the approved permit modification 24590-PTF-PCN-ENV-12-013.

ITEM (10): DWP Table III.10.E.A

Page 84 of 362 – Add Engineering Specification 24590-WTP-3PS-HD00-T0001, Rev 4, located in Appendix 7.7, in accordance with the approved design package PTF-095 for PIH-TK-00001.



ITEM (11): DWP Table III.10.E.B

Page 85 of 362 through 88 of 362 – Replace General Arrangement (GA) drawing 24590-LAW-P1-P01T-00005, Rev 3, with Rev 4, in accordance with the approved permit modification 24590-LAW-PCN-ENV-11-008.

ITEM (12): DWP Table III.10.E.B

Page 85 of 362 through 88 of 362 – In accordance with the approved permit modification 24590-LAW-PCN-ENV-12-002, replace the following GAs:

- 24590-LAW-P1-P01T-00002, Rev 5, with Rev 6
 - 24590-LAW-P1-P01T-00004, Rev 3, with Rev 4.
-

ITEM (13): DWP Table III.10.E.C

Page 96 of 362 – Add Engineering Specification 24590-WTP-3PS-HD00-T0001, Rev 4, located in Appendix 7.7, in accordance with the approved design package HLW-029 for HSH-TK-00001/2.

ITEM (14): DWP Table III.10.E.D

Page 99 of 362 – Replace P&ID 24590-LAB-M6-RLD-00001001, Rev 0, with Rev 1, and P&ID 24590-LAB-M6-RLD-00002001, Rev 0 with Rev 1, in accordance with the approved permit modification 24590-LAB-PCN-ENV-11-001.

ITEM (15): DWP Table III.10.E.J

Page 126 of 362 – Replace P&ID 24590-PTF-M6-TCP-00001002, Rev 0, with Rev 1, in accordance with the approved permit modification 24590-PTF-PCN-ENV-12-006.

ITEM (16): DWP Table III.10.G.A

Page 193 of 362 – Replace Mechanical Data Sheet 24590-PTF-MVD-CNP-00016, Rev 1, with 24590-PTF-MVD-CNP-00006, Rev 6, in accordance with the approved permit modification 24590-PTF-PCN-ENV-12-008.

ITEM (17): DWP Table III.10.H.A

Pages 252 of 362 through 258 of 362 – Replace Process Flow Diagram (PFD) 24590-LAW-M5 V17T-P0010, Rev 2, with 24590-LAW-M5 V17T-00010, Rev 4 and 24590-LAW-M5 V17T-P0011, Rev 1, with 24590-LAW-M5 V17T-00011, Rev 5, in accordance with the submitted design package LAW-026c.



ITEM (18): DWP Table III.10.J.A

Page 252 of 362– Replace Corrosion Evaluation 24950-HLW-N1D-HOP-P0005, Rev 1, with 24590-HLW-N1D-HOP-00005, Rev 5, in accordance with the approved permit modification 24590-HLW-PCN-ENV-12-005.

ITEM (19): DWP Appendix 8.2

Correct the drawing title for P&ID 24590-PTF-M6-FRP-00010001, Rev 0, to read “P&ID - PTF Waste Receipt Process System Utility Services PWD-RK-00001” in accordance with the approved permit modification 24590-PTF-PCN-ENV-12-006.

ITEM (20): DWP Appendix 8.6

In accordance with the approved permit modification 24590-PTF-PCN-ENV-12-008:

Replace:	With:
24590-PTF-MVD-CNP-P0006, Rev. 0	24590-PTF-MVD-CNP-00006, Rev 6
24590-PTF-MVD-FEP-P0006, Rev. 3	24590-PTF-MVD-FEP-00006, Rev. 5
24590-PTF-MVD-FEP-P0007, Rev. 2	24590-PTF-MVD-FEP-00007, Rev. 5
24590-PTF-MVD-TLP-P0005, Rev. 2	24590-PTF-MVD-TLP-00005, Rev. 7.

ITEM (21): DWP Appendix 9.1

Replace the following PFDs in accordance with the submitted design package LAW-026c:

--24590-LAW-M5-V17T-P0010, Rev 2, with 24590-LAW-M5-V17T-00010, Rev 4
--24590-LAW-M5-V17T-P0011, Rev 1, with 24590-LAW-M5-V17T-00011, Rev 5.

ITEM (22): DWP Appendix 9.1

Add the following documents in accordance with the submitted design package LAW-026c:

--24590-LAW-M5N-V17T-00015
--24590-LAW-M5N-V17T-00017.

ITEM (23): DWP Appendix 9.4

Delete GA 24590-LAW-P1-P01T-00008, Rev 7, in accordance with the approved permit modification 24590-WTP-PCN-ENV-11-009.



HANFORD TANK WASTE
TREATMENT AND
IMMOBILIZATION PLANT
(WTP)

**DANGEROUS WASTE PERMIT
DRAFT PERMIT MODIFICATION OCTOBER 2013
WTP Comments**

ITEM (24): DWP Appendix 9.6

Add Mechanical Data Sheet 24590-LAW-MAD-LVP-00006, Rev. 9, in accordance with the submitted design package LAW-026c.

ITEM (25): DWP Appendix 9.7

Add Engineering Specification 24590-LAW-3PS-MACS-T0001, Rev. 2, and associated change documents:

--24590-QL-MRA-MACS-00007-T0005

--24590-WTP-SDDR-MS-12-00039

in accordance with the submitted design package LAW-026c.

ITEM (26): DWP Appendix 9.9

Add Corrosion Evaluation 24590-LAW-N1D-LVP-00003, Rev 3, in accordance with the submitted design package LAW-026c.

ITEM (27): DWP Appendix 9.11

Add the Independent Qualified Registered Professional Engineer (IQRPE) report 24590-CM-HC4-HXYG-00240-02-00009, Rev 00A, in accordance with the submitted design package LAW-026c.

ITEM (28): DWP Appendix 9.11

Replace the IQRPE report 24590-CM-HC4-HXYG-00240-02-00008, Rev 0, with Rev 00A, in accordance with the approved permit modification 24590-LAW-PCN-ENV-13-001.

ITEM (29): DWP Appendix 10.4

Delete GAs 24590-HLW-P1-P01T-00010, Rev 11, and 24590-HLW-P1-P01T-00011, Rev 11, in accordance with the approved permit modification 24590-WTP-PCN-ENV-11-009.
