



**U.S. Department of Energy
Hanford Site**

February 9, 2021

21-ECD-000538
REISSUE

Mr. David Bowen, Program Manager
Nuclear Waste Program
Washington State Department of Ecology
3100 Port of Benton Boulevard
Richland, Washington 99354

Dear Mr. Bowen:

REISSUE - SUBMITTAL OF HANFORD FACILITY RESOURCE CONSERVATION AND RECOVERY ACT PERMIT MODIFICATION NOTIFICATION FORM 24590-LAW-PCN-ENV-20-002

This letter is being reissued to add the permit change notice to the Attachment; original letter number is 20-ECD-0067.

This Class 1 prime modification provides an update to three Low-Activity Waste Piping and Instrumentation Diagrams and one General Arrangement Drawing for incorporation into Appendix 9.2 and Appendix 9.4, of the Dangerous Waste Permit.

If you have any questions, please contact me, or your staff may contact Christopher J. Kemp, Director, Environmental Compliance Division, Office of River Protection, on (509) 376-7828, or Sheila Davis, Bechtel National, Inc., on (509) 827-3185.

Sincerely,

GLYN
TRENCHARD

Digitally signed by GLYN
TRENCHARD
Date: 2021.02.09
16:17:21 -08'00'

Glyn D. Trenchard, Assistant Manager
Technical and Regulatory Support
Office of River Protection

ECD:MEB

Attachment

cc: See page 2

Mr. David Bowen
20-ECD-000538

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February 9, 2021

cc w/attach:

J. Cantu, Ecology
M. E. Jones, Ecology
J. K. Perry, HMIS
Administrative Record (WTP H-0-8)
Environmental Portal

cc w/o attach:

J. Bell, NPT
L. Contreras, YN
S. L. Dahl, Ecology
D. McDonald, Ecology
M. Murphy, CTUIR
M. Woods, Oregon Energy

Attachment
21-ECD-000538
REISSUE

REISSUE – SUBMITTAL OF HANFORD FACILITY RESOURCE CONSERVATION
AND RECOVERY ACT PERMIT MODIFICATION NOTIFICATION FORM
24590-LAW-PCN-ENV-20-002

(9 Pages Including Cover Sheet)

Quarter Ending: 12/31/2020
RCRA Operating Record Number: R605

24590-LAW-PCN-ENV-20-002

Hanford Facility RCRA Permit Modification Notification Form
Part III, Operating Unit Group 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
Updated three LAW P&IDs for Appendix 9.2 and one LAW GA for Appendix 9.4

Submitted by Co-Operator:

Reviewed by ORP Program Office:

Robert Haggard 11/25/2020
Robert D. Haggard *Date*

 Digitally signed by Thomas W. Fletcher
Date: 2021.02.04 07:35:54 -08'00'
Thomas W. Fletcher *Date*

Quarter Ending: 12/31/2020

24590-LAW-PCN-ENV-20-002

RCRA Operating Record Number: R605

Hanford Facility RCRA Permit Modification Notification Form					
Unit: Waste Treatment and Immobilization Plant		Permit Part: Part III, Operating Unit Group 10			
<u>Description of Modification:</u>					
The purpose of this Class ¹ 1 modification is to update three LAW P&IDs in Appendix 9.2 and one General Arrangement Drawing in Appendix 9.4. The following revisions are being submitted for incorporation into the permit:					
Appendix 9.2					
Replace:	24590-LAW-M6-LVP-00004002 Rev. 4	With:	24590-LAW-M6-LVP-00004002 Rev. 5		
Replace:	24590-LAW-M6-LVP-00002006 Rev. 2	With:	24590-LAW-M6-LVP-00002006 Rev. 3		
Replace:	24590-LAW-M6-LCP-00001001 Rev. 1	With:	24590-LAW-M6-LCP-00001001 Rev. 2		
Appendix 9.4					
Replace:	24590-LAW-P1-P01T-00005 Rev. 6	With:	24590-LAW-P1-P01T-00005 Rev. 7		
Changes incorporated into the above-referenced design drawings are bubbled and flagged, and source documents for changes are included in the revision notes.					
<ul style="list-style-type: none"> • 24590-LAW-M6-LCP-00001001 <ul style="list-style-type: none"> ○ Note 14 clarification regarding the addition of PCV-0103 per startup request: The ISA supply coming to bulge was unregulated. Good design practice is to have the ISA coming to devices (e.g., YYs and YVs) regulated to provide steady air pressure at the recommended nominal pressure. PCV-0103 was added to the design so that the actuated valves (and associated solenoid valves) would be supplied with a steady, nominal air pressure of 90 PSIG. • 24590-LAW-M6-LVP-00004002 <ul style="list-style-type: none"> ○ Notes 14, 18, and 21 were pared down from the detailed description of change documents to cross referencing the versions in which the changes were made – no change to design. The permit version (Revision 4) includes the detailed notes, if needed for reference. ○ Note 20 described where the system/quality/seismic breaks were located. Revision 5 shows all breaks with flags, therefore the description is redundant and was deleted ○ Notes 25 thru 26 provide construction direction and detail reference. • 24590-LAW-M6-LVP-00002006 Rev. 3 – majority of the changes are the direct result of more design detail provided from the vendors of the stack monitoring equipment, or by the flow down of details and requirements from the SDD. <ul style="list-style-type: none"> ○ Note 14 and the application of the AVG symbol provides additional detail as to how the CEMS is monitored and what initiates a trip (i.e., on a rolling hourly average). ○ Notes 16 and 17 provides detail on the calibration of the units. Instrument calibration mode inhibits alarms and trips. This is being added for clarity. ○ Note 18 provides clear direction as to the required position of the isolation valves to the units in order to prevent hardware damage. ○ Notes 19 thru 21 provide construction direction and detail reference. 					
WAC 173-303-830 Modification Class:		Class 1	Class ¹ 1	Class 2	Class 3
Please mark the Modification Class:			X		



This document has been digitally signed using the Electrosign process.

Document for Signature

Document Number: 24590-LAW-PCN-ENV-20-002 **Rev:** 0

Participants	Signature	Completed	Status	Result	Comments
Signers	11/25/2020 6:17 PM				
Haggard, Robert		11/25/2020 6:34 PM	Completed	Approve	
Final Approver	11/25/2020 6:34 PM				
Haggard, Robert		11/30/2020 4:33 PM	Completed	Approve	

