



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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**COVERSHEET**

For Letter 20-NWP-094  
Dated June 24, 2020

Re: Final Class 3 Permit Modification 8C.2020.3F 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 10, Waste Treatment and Immobilization Plant, 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://fortress.wa.gov/ecy/nwp/permitting/8C.2020.3F/>.

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 24, 2020

20-NWP-094

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

Valerie McCain, Project Director  
Bechtel National, Inc.  
2435 Stevens Center Place, MSIN: MS19-A  
Richland, Washington 99354

Re: Final Class 3 Permit Modification 8C.2020.3F 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 10, Waste Treatment and Immobilization Plant, WA7890008967

References: See page 4

Dear Brian T. Vance and Valerie McCain:

This letter issues the Department of Ecology's (Ecology) final permit decision on the draft 8C.2019.1D permit modification (Reference 1) now issued as the final 8C.2020.3F permit modification.

Ecology incorporated the final 8C.2020.3F permit modification in the Waste Treatment and Immobilization Plant (WTP) Permit. In accordance with Washington Administrative Code (WAC) 173-303-840(8)(b), this portion of the WTP Permit is effective July 24, 2020.

The purpose of this Class 3 Permit Modification is to update operating permit conditions to support the Direct Feed Low-Activity Waste process, including specific permit conditions for the Low-Activity Waste (LAW) Facility and the Effluent Management Facility (EMF). The permit modification also includes updated chapters, updated Interim Compliance Schedules for the LAW and EMF that reflect new and completed schedule items, and new and revised engineering documents and drawings to support the LAW and EMF in the WTP Permit.

In addition to the changes listed above Ecology also made the following additions to the final files to support the issuance of the permit:

- Added general condition language to III.10.C.6.a and III.10.C.7.a in the Unit Specific Permit Conditions.
- Marked Interim Compliance Schedule (ICS) Item - LAW-13, in Appendix 1.3, as complete. All necessary information to complete this ICS Item was formally submitted and approved (24590-LAW-PCN-ENV-18-012 and 8C.2020.3F).
- Added language in Chapter 3C, “Waste Analysis Plan for Direct Feed LAW Configuration,” to Section 3.C.5.4, Land Disposal Restrictions Evaluation for Immobilized Waste.
- Updated Table 8-1 in Chapter 8, “Personnel Training.”

The approval of this permit modification closes the following ICS Items in the WTP Permit: LAW-3 through LAW-7, LAW-11, LAW-13 through LAW-15, LAW-17, LAW-25, LAW-45, LAW-46 as well as EMF-3 through EMF-7, EMF-11 and EMF-45. The ICS now reflects a “Complete” status for each one.

As required by WAC 173-303-840(3)(d), Ecology held a 45-day public comment period from February 10, 2020 through March 26, 2020. Ecology received three sets of public comments during the public comment period. Ecology reviewed the comments, and a *Response to Comments* document is on the enclosed DVD (Ecology Publication 20-05-020) and on Ecology’s website at <https://fortress.wa.gov/ecy/publications/SummaryPages/2005020.html>.

The permit modification can be accessed at the Ecology website:  
<https://fortress.wa.gov/ecy/nwp/permitting/8C.2020.3F/>.

The permit modification is also on the enclosed DVD. A DVD is located at the Hanford Public Information Repositories in Richland, Spokane, and Seattle, Washington, as well as Portland, Oregon. A hard copy and DVD 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.

In accordance with WAC 173-303-830(4)(f)(ii), Ecology's decision to grant or deny a Class 3 Permit Modification request under this section may be appealed under the permit appeal procedures of WAC 173-303-845.

### **Your Right to Appeal**

You have a right to appeal this permit modification to the Pollution Control Hearings Board (PCHB) within 30 days of the date of receipt of this Permit. The appeal process is governed by Chapter 43.21B of the Revised Code of Washington (RCW) and Chapter 371-08 of the WAC. "Date of receipt" is defined in RCW 43.21B.001(2).

To appeal you must do all of the following within 30 days of the date of receipt of this Permit:

- File your appeal and a copy of this Permit with the PCHB (see addresses in this letter). Filing means actual receipt by the PCHB during regular business hours.
- Serve a copy of your appeal and this Permit on Ecology in paper form – by mail or in person (see addresses below). E-mail is not accepted.

You must also comply with other applicable requirements in Chapter 43.21B of the RCW and Chapter 371-08 of the WAC.

### **1. To file your appeal with the Pollution Control Hearings Boards**

**Mail appeal to:**

**OR**

**Deliver your appeal in person to:**

The Pollution Control Hearings Board  
PO Box 40903  
Olympia, Washington 98504-0903

The Pollution Control Hearings Board  
1111 Israel Road, Southwest, Suite 301  
Tumwater, Washington 98501

### **2. To serve your appeal on the Department of Ecology**

**Mail appeal to:**

**OR**

**Deliver your appeal in person to:**

The Department of Ecology  
Appeals Processor  
PO Box 47608  
Olympia, Washington 98504-7608

The Department of Ecology  
Appeals Processor  
300 Desmond Drive Southeast  
Lacey, Washington 98503

### **3. Send a copy of your appeal to:**

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

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

Sincerely,



Digitally signed by  
Schleif, Stephanie  
(ECY)

Stephanie Schleif  
Deputy Program Manager  
Nuclear Waste Program

mj/ag  
Enclosure

References:

1. Letter 20-NWP-020, dated February 5, 2020, "Proposed Class 3 Draft Permit Modification 8C.2019.1D for the Direct Feed Low-Activity Waste Operation 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 10, Waste Treatment and Immobilization Plant, WA 7890008967"
2. Letter 19-NWP-191, dated December 9, 2019, "Technical Review for the Low- Activity Waste Facility and Effluent Management Facility 24590-WTP-PCN-ENV-18-007, Class 3 Permit Modification 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 10, Waste Treatment and Immobilization Plant (WTP Permit), WA 7890008967"
3. Letter 19-NWP-147, dated September 16, 2019, "Completeness Determination for the Certified Draft Direct Feed Low-Activity Waste Operations Class 3 Permit Modification 24590-WTP-PCN-ENV-18-007, Submitted for 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 10, Waste Treatment and Immobilization Plant (WTP) Permit, WA7890008967"
4. Letter 19-ECD-0047, dated June 26, 2019, "Submittal of Proposed Class 3 Permit Modification of the Hanford Facility Dangerous Waste Operating Permits for the Low Activity Waste Facility and the Effluent Management Facility 24590-WTP-PCN-ENV-18-007"

cc electronic w/o enc:

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BNI Correspondence Control

CHPRC Correspondence Control  
Environmental Portal  
Gonzaga University Foley Center Library  
Hanford Administrative Record,  
Hanford Site-wide Permit  
Hanford Facility Operating Record  
MSA Correspondence Control  
NWP RIM Coordinators, Ecology  
PNNL Correspondence Control  
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

cc w/enc, hard copy:

NWP Library: Hanford Site-wide Permit