



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

3100 Port of Benton Blvd • Richland, WA 99354 • (509) 372-7950
711 for Washington Relay Service • Persons with a speech disability can call (877) 833-6341

COVERSHEET

For Letter 21-NWP-005
Dated January 29, 2021

Re: Final Class 3 Permit Modification 8C.2020.12F 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 "Safe Start" 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 on Ecology's website at
<https://fortress.wa.gov/ecy/nwp/permitting/8C.2020.12F/>.

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



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January 29, 2021

21-NWP-005

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Re: Final Class 3 Permit Modification 8C.2020.12F 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 4

Dear Permittees:

This letter issues the Department of Ecology's (Ecology) final permit decision on the draft 8C.2020.3D permit modification (Reference 8) now issued as the final 8C.2020.12F permit modification.

Ecology incorporated the final 8C.2020.12F permit modification in part III, Operating Unit Group 1 (OUG 1), Low-Activity Waste Pretreatment System (LAWPS). In accordance with Washington Administrative Code (WAC) 173-303-840(8)(b), this portion of the Site-wide Permit is effective March 1, 2021.

The purpose of this Class 3 Permit Modification is to add chapters, appendices, unit specific permit conditions and an interim compliance schedule for the LAWPS OUG 1 in the Site-wide Permit.

As required by WAC 173-303-840(3)(d), Ecology held a 45-day public comment period from June 22, 2020 through August 7, 2020. An additional 45-day public comment period was held from September 28, 2020 through November 12, 2020. Ecology received five public comments during both public comment periods. Ecology reviewed the comments, and a *Response to Comments* document is on the enclosed DVD (Ecology Publication 21-05-005) and on Ecology's publication website at <https://apps.ecology.wa.gov/publications/summarypages/2105005.html>.

Ecology approved four Temporary Authorization (TA) requests for this modification on the following dates:

- TA #1, July 8, 2020
- TA #2, September 1, 2020
- TA #3, September 10, 2020
- TA #1A, October 20, 2020

The permit modification can be accessed at the Ecology website:
<https://fortress.wa.gov/ecy/nwp/permitting/8C.2020.12F/>.

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 and hard copies 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:

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:

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

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 (509) 372-7917 or yoana.lucatero@ecy.wa.gov, or Mandy Jones, Permit Coordinator, at (509) 372-7916 or mandy.jones@ecy.wa.gov.

Sincerely,



Digitally signed by
Schleif, Stephanie
(ECY)

Stephanie Schleif
Deputy Program Manager
Nuclear Waste Program

yl/ag
Enclosure

cc: See page 6

References:

1. Letter 19-ECD-0028, dated April 24, 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-0010, dated March 11, 2020, "Submittal of the Request for Temporary Authorizations to Support the Low-Activity Waste Pretreatment System Operating Unit Group Permit"
6. Letter 20-NWP-068, dated April 8, 2020, "Response to the Submittal of the Request for Temporary Authorizations to Support the Low-Activity Waste Pretreatment System Operating Unit Group Permit"
7. 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)"
8. Letter 20-NWP-083, dated June 18, 2020, "Proposed Class 3 Permit Modification, 8C.2020.3D to the *Hanford Facility Resource Conservation and Recovery Act Permit, Dangerous Waste* (Site-wide Permit), Part III, Operating Unit Group 1, Low-Activity Waste Pretreatment System (LAWPS), WA7890008967"
9. Letter 20-NWP-115, dated July 8, 2020, "Submittal of the Requests for Temporary Authorizations to Support the Low-Activity Waste Pretreatment System (LAWPS) Operating Unit Group Permit"
10. Letter 20-NWP-144, dated September 1, 2020, "Submittal of the Requests for Temporary Authorizations to Support the Low-Activity Waste Pretreatment System (LAWPS) Operating Unit Group Permit"
11. Letter 20-NWP-156, dated September 10, 2020, "Submittal of the Requests for Temporary Authorizations to Support the Low-Activity Waste Pretreatment System (LAWPS) Operating Unit Group Permit"
12. Letter 20-NWP-162, dated October 20, 2020, "Submittal of the Requests for Temporary Authorizations to Support the Low-Activity Waste Pretreatment System (LAWPS) Operating Unit Group (OUG) Permit"

cc electronic w/o enc:

Dave Bartus, EPA	Chris Strand, WRPS
David Einan, EPA	Eric Van Mason, WRPS
Mary Beth Burandt, USDOE-ORP	ERWM Staff, YN
Lori Huffman, USDOE-ORP	Debra Alexander, Ecology
Christopher Kemp, USDOE-ORP	Jennifer Cantu, Ecology
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Tony McKarns, USDOE-RL	Jay, Decker, Ecology
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Curt Clement, MSA	Nina Menard, Ecology
Jon Perry, MSA	John Price, Ecology
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cc electronic w/enc and DVD:

Tim Hamlin, EPA	BNI Correspondence Control
Tony McKarns, USDOE-RL	CHPRC Correspondence Control
Lori Huffman, USDOE-ORP	Environmental Portal
Sheila Davis, BNI	Gonzaga University Foley Center Library
Brittany Sparks, BNI	Hanford Administrative Record, Hanford
Mason Murphy, CTUIR	Site-wide Permit
Jack Bell, NPT	Hanford Facility Operating Record
Rex Buck Jr., Wanapum	MSA Correspondence Control
Laurene Contreras, YN	NWP RIM Coordinators, Ecology
Susan Leckband, HAB	PNNL Correspondence Control
David Reeploeg, Hanford Communities	Portland State University Library,
Max Woods, ODOE	Government Information
Robin Priddy, BCAA	University of Washington Suzzallo Library,
Matthew Drumheller, USACE	Government Publications
Trevor Fox, USFW	USDOE-ORP Correspondence Control
Mike Livingston, WDFW	USDOE Public Reading Room, CIC
John Martell, WDOH	USDOE-RL Correspondence Control
John Wiesman, WDOH	EPA Region 10 Hanford Field Office,
Randy Treadwell, WSDA	Correspondence Control
Allyson Brooks, WSDAHP	WRPS Correspondence Control
Cindy Preston, WSDNR	

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