



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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October 20, 2020

20-NWP-162

Brian T. Vance, Manager
Richland Operations Office
United States Department of Energy
PO Box 550, MSIN: H6-60
Richland, Washington 99352

Re: Submittal of the Requests for Temporary Authorizations to Support the Low-Activity Waste Pretreatment System (LAWPS) Operating Unit Group (OUG) Permit

References: See page 3

Dear Brian T. Vance:

The Department of Ecology (Ecology) received your requests for Temporary Authorizations (TA) to support the LAWPS OUG 1 Permit (Reference 1). The United States Department of Energy (USDOE) originally submitted three separate TA requests in one letter. Ecology is evaluating the approval of each TA request individually.

This approval letter is specific to TA Request #1A, detailed in References 1 and 2.

In USDOE's TA Request #1A, the following activities have been requested for construction of the portions of the LAWPS OUG. The following activities were part of TA Request #1, but were not previously approved:

- Place Hose-in-Hose Transfer Lines (HIHTLs) in excavations and on support structures. This includes connection of HIHTLs to Double-Shell Tank (DST) OUG process equipment at the AP-106, AP-107, and AP-108 tanks in the 241-AP Farm.
- Backfill and place shielding and bridge plates over the HIHTLs.

Ecology has reviewed TA Request #1A in conjunction with the permit application material, provided by USDOE and Washington River Protection Solutions (the Permittees), USDOE Letter 19-ECD-0028 (Reference 3), and the associated Class 3 LAWPS OUG 1 draft permit modification that is out for public comment (8C.2020.3D).

We have determined that this request satisfies the criteria in Washington Administrative Code (WAC) 173-303-830(4)(e)(ii). Pursuant to WAC 173-303-830(4)(e)(iii)(B)(III) and (V), Ecology agrees this TA will prevent disruption of ongoing waste management activities, and will facilitate treatment of Hanford double shell tank (DST) waste, resulting in the protection of human health and the environment. Ecology approves the two requested activities to be conducted by the Permittees under this specific TA.

Ecology expects email notification from the permittees when temporary hook ups and disconnects are performed, so that Ecology staff can perform and document site visits to verify that construction is occurring within the confines of this TA. Final hook up is not allowed until after the final permit is issued.

Based on public comments, received during the public comment period for the LAWPS OUG 1 Class 3 Modification that closed on August 7, 2020, Ecology has determined that a State Environmental Policy Act (SEPA) Determination of Significance and Notice of Adoption needed to be circulated.

The SEPA Determination of Significance and Notice of Adoption was hosted on the SEPA register and a notice was sent electronically to the public Listserv distribution list on August 24, 2020. In addition, Ecology reopened the public comment period for an additional 45-days to begin September 28 through November 12, 2020, according to WAC 173-303-840(7)(c).

Pursuant to WAC 173-303-830(4)(e), Ecology approves the TA activities described above for 180 days, effective October 20, 2020 through April 18, 2021.

While performing the work detailed under this TA approval, the Permittees are required to construct according to the design and engineering standards defined in the draft permit modification currently out for public comment, *Low Activity Waste Pretreatment System, OUG 1 Class 3 Modification*, (8C.2020.3D). In addition, the Permittees are also required to comply with draft permit conditions III.1.J General Requirements and III.1.Q.1 Hose-in-Hose Waste Transfer Line Requirements.


Ecology will make its final permit decision as detailed in WAC 173-303-840(8). The final LAWPS OUG 1 permit will replace this TA approval and be incorporated in the Hanford Facility Resource Conservation and Recovery Act Permit, Dangerous Waste Portion, Revision 8C, for the Treatment, Storage and Disposal of Dangerous Waste, WA7890008967 (Site-Wide Permit).

When the LAWPS OUG 1 is effective and is added to the Site-Wide Permit, the Permittees will be required to be in compliance with all permit conditions detailed in the LAWPS OUG 1 Permit.

USDOE provided Ecology an evaluation of the criteria and toxic air emissions associated with the TA requests for the Tank Side Cesium Removal (TSCR) system (Reference 4). Ecology does not need any additional information on the associated criteria and toxic air emissions for the work scope approved by this TA approval letter.

If there are any questions, please contact Suzanne Dahl, Tank Waste Treatment Section Manager, at suzanne.dahl@ecy.wa.gov or (509) 539-3489, or Mandy Jones, Permit Coordinator, at mandy.jones@ecy.wa.gov or (509) 372-7916.

Sincerely,

 Digitally signed
by Schleif,
Stephanie (ECY)

Stephanie Schleif
Deputy Program Manager
Nuclear Waste Program

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cc: See page 3

References:

1. 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"
2. E-mail from Mary E. Burandt, USDOE-ORP, to Yoana Lucatero, Mandy Jones and Suzanne Dahl, ECY, dated September 24, 2020, "Submittal of TA # 1A"
3. 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)"
4. Letter 20-ECD-0037, dated July 8, 2020, "Evaluation of Potential Tank Side Cesium Removal System Air Emissions"

cc electronic:

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