

Statement of Basis

For Modification of the Hanford Facility Resource Conservation and Recovery Act (RCRA)
Permit (WA7890008967) Part III, Operating Unit 16, 400 Area Waste Management Unit

Introduction

Permittees

United States Department of Energy
(Owner/Operator)
Richland Operations Office
P.O. Box 550
Richland, Washington 99352

Fluor Hanford
(Co-Operator)
P.O. Box 1000
Richland, Washington 99352

The Washington State Department of Ecology has prepared this Statement of Basis to explain proposed changes to the Hanford Facility permit to add a new treatment, storage and disposal unit, the 400 Area Waste Management Unit. This new unit will formally be Part III, Operating Unit 16 for the Hanford Facility Resource Conservation and Recovery Act (RCRA) Permit (WA7890008967).

This Statement of Basis follows Washington Administrative Code (WAC) 173-303-840(2)(f)(iv). Its purpose is to briefly describe the basis and reasons for the draft permit conditions and to describe the decision process.

1.0 Hanford Facility Permit Background

Ecology issued the permit for the Hanford Facility in 1994. The permit sets forth standard and general facility conditions, and unit-specific conditions for the operation, closure, and post closure of units that treat, store, or dispose of mixed and dangerous waste at Hanford.

Ecology modifies the permit periodically to

- incorporate final status conditions for newly incorporated units.
- reflect formal modifications.
- improve grammar, consistency, and presentation.
- retire from the Permit, unit groups that have achieved clean closure.

The types of changes Ecology can make to a dangerous waste permit are listed in WAC 173-303-830.

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2.0 The permitting process

The United States Department of Energy (USDOE) is continuing its mission to drain the bulk sodium from the FFTF reactor. USDOE and Ecology have agreed that the drained sodium and sodium contaminated components should be stored in a permitted area at the 400 Area Waste Management Unit (FFTF). On November 16, 2006 a Temporary Authorization (TA) was provided to USDOE to allow the safe storage of mixed sodium waste and components for a period of 6-months. On May 4, 2007 a second TA was provided to USDOE to allow the 400 Area WMU to operate while the Part B Permit Application and Class 3 Permit Modification are being processed.

3.0 Procedures for reaching a final decision

WAC 173-303-830 provides the requirements for modifying the existing Hanford Facility RCRA Permit. On May 10, 2007 the USDOE submitted the certified Hanford Facility Dangerous Waste Part A Form and Part B Permit Application for the 400 Area WMU. On June 5, 2007 Ecology issued the Completeness letter to USDOE for the 400 Area WMU Part B Permit Application.

The Washington State Hazardous Waste Management Act (Chapter 70.105 Revised Code of Washington) and regulations in Chapter 173-303 of the WAC regulate the management of dangerous waste in Washington. In accordance with WAC 173-303-800, facilities that treat, store, or dispose of dangerous waste must obtain a permit for these activities.

The process to change the permit is in WAC 173-303-840 (10). Ecology is holding a 45-day public comment period for proposed permit modifications to the permit to add conditions for the 400 Area Waste Management Unit group. The comment period begins on August 27 and ends October 11, 2007.

The process for public notice and involvement for this permit change is in WAC 173-303-840(3). Comments must be postmarked, hand-delivered, or received by e-mail or fax no later than close of business on Thursday, October 11, 2007. Direct all comments to:

Jeff Ayres
Department of Ecology
3100 Port of Benton Blvd.
Richland, WA 99354
E-mail: jayr461@ecy.wa.gov
Fax 509-372-7971

Ecology does not plan to hold a public hearing, but if strong public interest arises, we will reconsider. To request a hearing contact Madeleine Brown at mabr461@ecy.wa.gov or at the address above.

Ecology will consider all comments it gets during the public comment period, and will respond to them in a written summary before making a final decision. We will then make a final permit decision, which will become effective 30 days after we notify the permittees and all who commented. If our decision includes substantial changes to the permit because of public comment, we will hold a new public comment period.

All commenters and the permittees will receive a copy of the Responsiveness Summary and a notification of the final permit decision. The final permit decision may be appealed within 30 days after Ecology issues the final permit decision notice.

3.1 Permit Appeal Process

You have a right to appeal this permit. To appeal this you must:

- File your appeal with the Pollution Control Hearings Board within 30 days of the “date of receipt” of this document. Filing means actual receipt by the Board during regular office hours
- Serve your appeal on the Department of Ecology within 30 days of the “date of receipt” of this document. Service may be accomplished by any of the procedures identified in WAC 371-08-305(10). “Date of receipt” is defined at RCW 43.21B.001(2).

Be sure to do the following:

- Include a copy of (1) the permit you are appealing and (2) the application for the permit.
- Serve and file your appeal in paper form; electronic copies are not accepted.

1. To file your appeal with the Pollution Control Hearings Board

Mail appeal to:

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

OR

Deliver your appeal in person to:

The Pollution Control Hearings Board
4224 – 6th Ave SE Rowe Six, Bldg 2
Lacey, WA 98503

2. To serve your appeal on the Department of Ecology

Mail appeal to:

The Department of Ecology
Appeals Coordinator
P.O. Box 47608
Olympia, WA 98504-7608

OR

Deliver your appeal in person to:

The Department of Ecology
Appeals Coordinator
300 Desmond Dr SE
Lacey, WA 98503

3. And send a copy of your appeal to:

Jeff Ayres
Department of Ecology
Nuclear Waste Program
3100 Port of Benton Blvd.

Richland, WA 99354

For additional information visit the Environmental Hearings Office Website:

<http://www.eho.wa.gov>

To find laws and agency rules visit the Washington State Legislature Website:

<http://www1.leg.wa.gov/CodeRevise>

3.2 Permit review

Copies of the permit for the Hanford Facility, including the proposed permit modifications, are available for review at the Hanford Public Information Repositories listed below. They are also in Ecology's Nuclear Waste Program office. To view them phone 509.372.7920.

For additional information, call the Hanford Cleanup Hotline toll-free at 800-321-2008.

HANFORD PUBLIC INFORMATION REPOSITORIES 3

Portland

Portland State University
Branford Price Millar Library
Attn: Don Frank
503.725.4132
1875 SW Park Ave.
Portland, OR

Richland

DOE Public Reading Room
Washington State University, Tri-Cities
Consolidated Information Center, Room 101-L
Attn: Janice Parthree
509.372.7443
2770 University Drive
Richland, WA

Spokane

Gonzaga University
Foley Center
Attn: Linda Pierce
509.323.3834
East 502 Boone
Spokane, WA

Seattle

University of Washington Government
Suzzallo Library
Publications Division,
Attn: Eleanor Chase 206.543.4664
Seattle, WA

This Statement of Basis is also available on line at
<http://www.ecy.wa.gov/programs/nwp/>.

If you need this publication in an alternate format, please call the Nuclear Waste Program at 509-372-7950. Persons with a hearing loss can call 711 for Washington Relay Service. Persons with a speech disability can call 877-833-6341.

3.0 Proposed modifications:

The scope of the permit is to allow the 400 Area WMU to store mixed waste. The mixed waste can include elemental sodium and sodium hydroxide; as well as debris contaminated with elemental sodium and sodium hydroxide. The mixed waste stored in the 400 Area WMU is limited to waste generated from the 400 Area. Mixed waste will be stored in 2 container storage units within the 400 Area WMU; the Fuel Storage Facility (FSF) and the Interim Storage Area (ISA). Only mixed waste will be stored in the 400 Area WMU until treatment capabilities are available.

4.1 FFTF History

The Fast Flux Test Facility (FFTF) was a 400-megawatt (thermal) liquid-metal cooled (sodium) research and test reactor located in the 400 Area of the Hanford Facility. The FFTF developed and tested advanced fuels and material for the Liquid Metal Fast Breeder Reactor Program. The FFTF was constructed in the late 1970's and was operated successfully from 1982 to 1992. The facility was shutdown in December 1992.

4.2 Permit Contents

The 400 Area Waste Management Unit consists of the following addendums which make up the Operating Unit 16 of the Hanford RCRA Permit.

- Addendum A: 400 Area WMU Part A Permit Application
- Addendum B: 400 Area WMU Waste Analysis Plan
- Addendum C: Reserved
- Addendum D: Reserved
- Addendum E: 400 Area WMU Contingency Plan
- Addendum F: 400 Area WMU Training Plan
- Addendum G: 400 Area WMU Closure Plan
- Addendum H: 400 Area WMU Container Storage Units Inspection Plan

The above referenced chapters and their enforceable sections are incorporated by reference.

4.3 400 Area WMU Unique Conditions

The following sections outline the basic sections of Operating Unit 16 of the Hanford RCRA Permit. The provisions of the conditions specified in the permit are summarized below for simplicity.

General Waste Management

This section states that the permittee may only accept dangerous waste with waste codes D001, D002, D003, and WSC2 for storage in the 400 Area WMU. Only mixed waste consisting of elemental sodium, sodium hydroxide, and sodium contaminated debris may be stored in the 2 container storage units within the 400 Area WMU.

Waste Analysis Plan

Waste analysis will not be performed do to the limited nature of the sodium waste stored at the site. Container compatibility is an issue that is addressed in this section.

Inspections

The permittee will perform inspections according to the following frequencies:

- Weekly container inspections
- Quarterly inspections of safety equipment
- Daily inspections of those portions of the 400 Area WMU that are in the process of receiving or transferring waste
- Annual ignitable/reactive waste storage area inspections

The Contingency Plan, Training Plan, and Closure Plan are attached as Addendums to the permit.