

STATE OF WASHINGTON DEPARTMENT OF ECOLOGY

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June 14, 1999

Mr. James E. Rasmussen U.S. Department of Energy P.O. Box 550, MSIN: A5-15 Richland, Washington 99352

Mr. William D. Adair Fluor Daniel Hanford, Inc. P.O. Box 1000, MSIN: H6-21 Richland, Washington 99352

Mr. Michael C. Hughes Bechtel Hanford, Inc. P.O. Box 969, MSIN: H0-09 Richland, Washington 99352

Mr. Richard S. Watkins Pacific Northwest National Laboratory P.O. Box 999, MSIN: P7-75 Richland, Washington 99352

Dear Messrs. Rasmussen, Adair, Hughes, and Watkins:

Re: Quarterly Notification of Class 1 Modifications to the Hanford Facility Resource Conservation and Recovery Act (RCRA) Permit, Dangerous Waste Portion (Quarter Ending March 31, 1999 – Condition I.C.3)

The Washington State Department of Ecology (Ecology) has reviewed the above-referenced quarterly Class 1 Modifications. Enclosed are the Modification Notification Forms indicating which Modifications Ecology has approved. Modifications for this quarter included updating information in Part III, Chapter 4, (Liquid Effluent Treatment Facility and 200 Area Effluent Treatment Facility) and Chapter 5 (242-A Evaporator).



Messrs. Rasmussen, Adair, Hughes, and Watkins June 21, 1999 Page 2

A Modification Notification Form for updating the Legal Description, Chapter 2, was also included in this Modification request. Ecology approved this Modification on January 7, 1999, by signing the Modification Notification Form. This particular change coincided with issuance of Mod D of the Permit, and as such, was incorporated into that Modification.

The Modification Notification Form updating the Legal Description in the Dangerous Waste Portion of the Permit (Attachment 2), also included a Modification to the Hazardous and Solid Waste Amendments (HSWA) Portion (Chapter 4) of the State Dangerous Waste Permit. As you know, Ecology is currently undergoing the process of transferring legal authority and administrative responsibility for RCRA corrective action from the U.S. Environmental Protection Agency (EPA) to Ecology. Until this transfer is complete, however, RCRA corrective action is regulated solely under the authority of the federal HSWA component of the Site-Wide Permit. The U.S. Department of Energy (USDOE) will need to contact EPA to propose changes to that portion of the Permit. Until such time as the HSWA portion of the Hanford Federal Facility Permit is formally modified, that portion of the Hanford Federal Facility proposed for deletion from the corrective action definition of facility will continue to be regulated under the federal HSWA Permit. I apologize for any confusion that may have been created by Ecology's actions regarding this particular issue.

Enclosure 1 consists of the Class 1 Modifications that Ecology has approved. If you have any questions or comments regarding this letter, please contact me at (509) 736-5715.

Sincerely,

Laura Ruud, Permit Specialist Nuclear Waste Program

LR:ld

Enclosure

cc w/encl.: Ellen Mattlin, USDOE

Suzette Thompson, FDH Gary Robinson, BHI Alice Ikenberry, PNNL Harold Tilden, PNNL J.R. Wilkinson, CTUIR Donna Powaukee, NPT

Russell Jim, YIN

Administrative Record: Site Wide Permit

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5.0 GROUNDWATER MONITORING [D-10]

2 5.1 EXEMPTION FROM GROUNDWATER PROTECTION REQUIREMENTS

3 [D-10a]

1

- 4 A waiver from the groundwater monitoring requirements as allowed under WAC 173-303-645 is not
- 5 requested. Therefore, the requirements of the Washington Administrate Code for groundwater
- 6 monitoring are applicable to the LERF.

7 5.2 INTERIM STATUS PERIOD GROUNDWATER MONITORING DATA [D-10b]

- 8 Information on interim status groundwater monitoring activities is provided in *Interim Status Ground*
- 9 Water Monitoring Plan for the 200 East Area Liquid Effluent Retention Facility (WHC 1991a), in
- 10 Hanford Site Groundwater Monitoring for Fiscal Year 1996 (PNNL 1997a), and in the Hanford
- 11 Environmental Information System. There have been no significant detections of the indicator parameters
- 12 that could be attributed to the LERF.

13 5.3 AQUIFER IDENTIFICATION [D-10c]

- 14 The characteristics of the uppermost aquifer beneath the LERF and the regional physiographic, geologic,
- and hydrogeologic setting of the LERF are summarized in Chapter 5.0 of the General Information Portion
- 16 (DOE/RL-91-28).

17 5.4 CONTAMINANT PLUME DESCRIPTION [D-10d]

- 18 A description of the contaminant plumes existing beneath the 200 East Area and 200 West Area is
- 19 provided in Chapter 5.0 of the General Information Portion (DOE/RL-91-28).

20 5.5 DETECTION MONITORING PROGRAM [D-10e]

- 21 Interim status groundwater monitoring will be continued until a final status groundwater monitoring plan
- 22 is submitted by DOE and approved by Ecology. The approved final status groundwater monitoring plan
- 23 will be implemented immediately on approval and will be submitted for incorporation as a modification
- 24 to the LERF permit. The ultimate goal is to develop a consolidated groundwater monitoring plan for the
- Hanford Site, which will supersede the LERF specific final status groundwater monitoring plan.

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Class 1 Modification: Quarter Ending 03/31/99

DOE/RL-97-03, Rev. 0A 03/99

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Class 3

Hanford Facility RCRA Permit Modification Notification Form

Unit: 242-A Evaportor

Permit Part & Chapter:
Part III, Chapter 5 and Attachment 35
[Appendix 4A]

Class 1 Class 1 Class 2

Description of Modification:

Appendix 4A, Table 4A-1:

Modification Class: 123

Table 4A-1. Process and Instrumentation Diagrams.

System	Drawing Number	Outstanding ECNs	Drawing Title		
Vapor-Liquid Separator	H-2-98988 Sh 1 Rev 5	ECN-647911 ECN-647883	P & ID Evap Recirc System		
Reboiler/Recirculation Line	H-2-98988 Sh 2 Rev 4	ECN-613444	P & ID Evap Recirc System		
Slurry System	H-2-98989 Rev 9	None	P & ID Slurry System		
Condensate Collection Tank	H-2-98990 Sh 1 Rev 8	ECN-610627 ECN-610628 ECN-642198	P & 1D Process Condensate System		
Secondary Containment Drain System	H-2-98995 Sh 1Rev-9 Rev 10	ECN 706940 ECN 706942	P & ID Drain System		
Secondary Containment Drain System	H-2-98995 Sh 2 Rev 4	None	P & ID Drain System		
Condensers	H-2-98999 Rev-10 Rev-11	None	P & 1D Vacuum Condenser System		
Pump Room Sump	H-2-99002 Rev 5	ECN-647885	P & ID Jet Gang Valve System		
Condensate Recycle System	H-2-99003 Rev 9	ECN-627940	P & ID Filtered Raw Water System		

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73-303-830, Append	lix I citation:		
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ed by RL Program O	ffice:	Reviewed by	Ecology:
9 Bilin 4	6/95 1/1	My	4/2/69
. E. Bilson	Date //	R/I/ Julian	" Date
	73-303-830, Append	res. ed by RL Program Office: A Gibm 4/6/95	res. ed by RL Program Office: Reviewed by RL Dibm HUGS

¹Class 1 modifications requiring prior Agency approval.

² This is only an advanced notification of an intended Class ¹1, 2, or 3 modification, this should be followed with a formal modification request, and consequently implement the required Public Involvement processes when required.

³ If the proposed modification does not match any modification listed in WAC 173-303-830 Appendix I, then the proposed modification should automatically be given a Class 3 status. This status may be maintained by the Department of Ecology, or down graded to ¹1, if appropriate.

Hanford Facility RCRA Permit Modification Notification Form Permit Part & Chapter: Unit: List of Attachments Hanford Facility RCRA Permit Dangerous Waste Portion, Attachment 2 HSWA Portion, Attachment F Description of Modification: Dangerous Waste Portion, Attachment 2, and HWSA Portion, Attachment F: The format of the legal description has changed; however, the boundaries are the same with the exception the requested change below. Thence S. along said E. right of way line to a point on the N. right of way line of Spengler Street, a platted street; Thence W. 145 feet to the W. right of way line of Stevens Drive; Thence S. to a point 30 feet N. of the S. line of sec. 27, T.10N., R.28 E.W.M.; Thence W. along a line 30 feet N. of, and parallel with, the S. line of sec. 27 to the E. line of the S.W. 1/4 of the S.E. 1/4 of said section; Thence N. along the E. line of the S.W. 1/4 of the S.E. 1/4 of sec. 27 to the S.E. corner of the N.W. 1/4 of the S.E. 1/4 of said sec. 27; Thence W, along the S, line of the N.W. 1/4 of the S.E. 1/4 to the W, line of the E. 1/2 of sec. 27; Thence N. along the W. line of the E. 1/2 of sec. 27, and of the E. 1/2 of sec. 22 and the E. 1/2 of sec. 14 to the N. right of way line of Horn Rapids Road; Thence continuing westerly and northwesterly along the N. right-of-way line of Horn Rapids Road 26,000 28,600 feet more or less to the line's intersection with the N. right-of-way line of State Highway 240, in the N.E. 1/4 of sec. 11, T.10N., R.27E.W.M.; Modification Class: 123 Class¹1 Class 2 Class 3 Class 1 X Please check one of the Classes: Relevant WAC 173-303-830, Appendix I Modification: N/A, Requesting review and approval as Class 11. Enter wording of the modification from WAC 173-303-830, Appendix I citation: Requesting under WAC 173-3003-830(3)(b)(ii)(4)(d) Other Modifications. (i) In the case of modifications not explicitly listed in Appendix I of this section, the permittee may submit a Class 3 modification request to the department, or he or she may request a determination by the director that the modification should be reviewed and approved as a Class 1 or Class 2 modification. If the permittee requests that the modification be classified as a Class 1 or 2 modification, he or she must provide the department with the necessary information to support the requested classification. Submitted by Co-Operator: Reviewed by RL Program Office: Reviewed by Ecology: W. D. Adair J. E. Rasmussen Date L. J. Cusack Date

² This is only an advanced notification of an intended Class ¹1, 2, or 3 modification, this should be followed with a formal modification request, and consequently implement the required Public Involvement processes when required.

¹ Class 1 modifications requiring prior Agency approval.

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Hanford Facility RCRA Permit Modification Notification Form Unit: Permit Part & Chapter: Part III, Chapter4 and Attachment 34 Liquid Effluent Retention Facility and [Chapter 5.0] 200 Area Effluent Treatment Facility Description of Modification: Section 5.5, Page 5-1, lines 20-26: DETECTION MONITORING PROGRAM [D-10e] 5.5 Interim status groundwater monitoring will be continued until a final status groundwater monitoring plan is submitted by DOE and approved by Ecology. The approved final status groundwater monitoring plan will be implemented immediately on approval and will be submitted for incorporation as a modification to the LERF permit before the end of calendar year 1998. The ultimate goal is to develop a consolidated groundwater monitoring plan for the Hanford Site, which will supersede the LERF specific final status groundwater monitoring plan. Modification Class: 123 Class¹1 Class 2 Class 3 Class 1 X Please check one of the Classes: Relevant WAC 173-303-830, Appendix I Modification: Enter wording of the modification from WAC 173-303-830, Appendix I citation: A. General Permit Provisions Administrative and Informational changes. Reviewed by RL Program Office: Submitted by Co-Operator: Reviewed by Ecology:

Date

J. D. Williams

H. E. Bilson

¹Class 1 modifications requiring prior Agency approval.

² This is only an advanced notification of an intended Class ¹1, 2, or 3 modification, this should be followed with a formal modification request, and consequently implement the required Public Involvement processes when required.

³ If the proposed modification does not match any modification listed in WAC 173-303-830 Appendix I, then the proposed modification should automatically be given a Class 3 status. This status may be maintained by the Department of Ecology, or down graded to ¹1, if appropriate.

Hanford Facility RCRA Permit Modification Notification Form

Unit:

Liquid Effluent Retention Facility and 200 Area Effluent Treatment Facility

Permit Part & Chapter:
Part III, Chapter 4 and Attachment 34
[Appendix 4A]

Description of Modification:

Appendix 4A, Table 4A-2:

Table 4A-2. Liquid Effluent Retention Facility Piping and Instrumentation.

LERF System	Drawing Number	Outstanding ECNs	Drawing Title
Transfer Piping to 242-A Evaporator	H-2-79604, Rev. 2Rev. 3	None	Piping Plot and Key Plans; 242-A Evaporator Condensate Stream (Sheet 1)
LERF Piping and Instrumentation	H-2-88766, Rev. +Rev/2	EGN:647888	P&ID LERF Basin and ETF Influent (Sheet 1)
LERF Piping and Instrumentation	H-2-88766, Rev.	ECN-647/209L	P&ID LERF Basin and ETF Influent (Sheet 2)
LERF Piping and Instrumentation	H-2-88766, Rev-	None	P&ID LERF Basin and ETF Influent (Sheet 3)
LERF Piping and Instrumentation	H-2-88766, Rev. 2Rev.5	None	P&ID LERF Basin and ETF Influent (Sheet 4)
	H-2-89351,-Rev.	ECN-649101	Piping & Instrumentation Diagram - Legend

Modification Class: 12 3	C	lass 1	Class ¹ 1	Class 2	Class 3
Please check one of the Classes:		X			
77		-			
Relevant WAC 173-303-830, Append	ix I Modification: A.1				
Enter wording of the modification from A. General Permit Provisions	m WAC 173-303-830, A	ppendix	I citation:		
A. General Permit Provisions 1. Administrative and Information	onal changes.				
Submitted by Co-Operator:	Reviewed by RL Progr	ram Offi	ce: AR	teyiewed by E	cology:
Jenyeth J. Svoods 3/16/99	Helen Gladow	4/6/6	29 /h/	lu	4/27/69
J. D. Williams Date	H. E. Bilson	1 6	ate /	R. J. Julian	Bate
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¹Class 1 modifications requiring prior Agency approval.

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Page 4 of 5 Hanford Facility RCRA Permit Modification Notification Form Permit Part & Chapter: Unit: Part III, Chapter4 and Attachment 34 Liquid Effluent Retention Facility and [Chapter 5.0] 200 Area Effluent Treatment Facility Description of Modification: Appendix 4B, Table 4B-1: Table 4B-1. Drawing of Effluent Treatment Facility and Load-In Station Secondary Containment Systems ETF Process Unit Outstanding ECNs Drawing Number Drawing Title Surge Tank, Process/Container H-2-89063, Rev. 3 NoneECN-647892 STRUCT - Foundation and Storage Areas and Trenches -Grade Beam Plan Foundation and Containment (Sheet 1) STRUCT - Foundation, Sections Sump Tank Containment None H-2-89065, Rev. 3 and Detail (Sheet 1) STRUCT - Verification Tank Verification Tank Foundation and H-2-89068, Rev. 3 NoneECN-647892 Containment Foundation (Sheet 1) NoneECN-641703 Load-In Facility Foundation and H-2-817970, Rev. 1 Structural - ETF Truck Load-in Containment ECN-647247 Facility Plans and Sections (Sheet 1) H-2-817970, Rev. 1 Load-In Facility Foundation and Structural - ETF Truck Load-in NoneECN-641703 Containment Facility Sections and Details (Sheet 2) Modification Class: 123 Class 1 Class 3 Class 1 Class 2 Please check one of the Classes: X Relevant WAC 173-303-830, Appendix I Modification:

Enter wording of the modification from WAC 173-303-830, Appendix I citation:

A. General Permit Provisions

1. Administrative and Informational changes.

Submitted by Co-Operator: Reviewed by RL Program Office: Reviewed by Ecology:

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Hanford Facility RCRA Permit Modification Notification Form

Unit:

Permit Part & Chapter:

Liquid Effluent Retention Facility and 200 Area Effluent Treatment Facility

Part III, Chapter4 and Attachment 34 [Chapter 5.0]

Description of Modification:

Appendix 4B, Table 4B-2:

Table 4B-2. Drawings of Major Process Units and Tanks at the Effluent Treatment Facility and Load-In Station.

ETF Process Unit	Drawing Number	Outstanding ECNs	Drawing Title		
Load-In Facility	H-2-817976, Rev. 1 H-2-817974, Rev. 9	None (CN-647201) ECN-6478201 ECN-647247	P&ID - ETF Truck Load-In Facility (Sheet 1)		
Surge Tank	H-2-89337, Rev. 6Rev. 10	ECN-636749 ECN-649101	P&ID - Surge Tank System (Sheet 1)		
UV/Oxidation	H-2-88976, Rev. 6	NoneE(3) 646667E ECN-647245	P&ID - UV Oxidizer Part 1 (Sheet 1)		
UV/Oxidation	H-2-89342, Rev. 6	NoneEGN-647245	P&ID - UV Oxidizer Part 2 (Sheet 1)		
Reverse Osmosis	H-2-88980, Rev. 6Rev. 8	None	P&ID - 1st RO Stage (Sheet 1)		
Reverse Osmosis	H-2-88982, Rev. 5Rev. 10	ECN-636700 ECN-611721 None	P&ID - 2nd RO Stage (Sheet 1)		
IX/Polishers H-2-88983, Rev. 5Rev. 8		ECN-636799 ECN-642800	P&ID - Polisher (Sheet 1)		
Verification Tanks	H-2-88985, Rev. 7Rev. 8	None	P&ID - Verification Tank System (Sheet 1)		
ETF Evaporator	H-2-89335, Rev. #Rev. 11	NoneECN-6466581 ECN-641719	P&ID - Evaporator (Sheet 1)		
Thin Film Dryer	11-2-88989, Rev. \$Rev. 13	ECN-641718 ECN-648763 ECN-646676 ECN-646672 ECN-642797	P&ID - Thin Film Dryer (Sheet 1)		
Transfer Piping from LERF to ETF	H-2-88768, Rev. I	None	Piping Plan/Profile 4"-60M-002-M17 and 3"-60M-001-M17 (Sheet 1)		
Transfer Piping from Load-In Facility to ETF	H-2-817969, Rev. I	W291-015 ECN-641703	Civil - ETF Truck Load-In Facility Site Plan (Sheet 1)		

Modification Class: 123	Class 1	Class ¹ 1	Class 2	Class 3
Please check one of the Classes:	X			

Relevant WAC 173-303-830, Appendix I Modification: A.1.

Enter wording of the modification from WAC 173-303-830, Appendix I citation:

- B. General Permit Provisions
 - 2. Administrative and Informational changes.

Submitted by Co-Operator:	Reviewed by RL Program O	ffice:	Reviewed by I	Ecology:
Temith J. Nobole 3/16/99	Aden Epster 4	1/95 /	Mur	4/2/199
J. D. Williams Date	H. E. Bilson	Date	K. J. Julian	1 Bate

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