



**U.S. Department of Energy
Hanford Site**

December 15, 2020

20-ECD-0063

Ms. Stephanie N. Schleif
Acting Program Manager
Nuclear Waste Program
Washington State Department of Ecology
3100 Port of Benton Boulevard
Richland, Washington 99354

Dear Ms. Schleif:

**SUBMITTAL OF HANFORD FACILITY RESOURCE CONSERVATION AND RECOVERY
ACT PERMIT MODIFICATION NOTIFICATION FORM 24590-WTP-PCN-ENV-20-002**

The purpose of this Class 1 prime permit modification is to revise the Interim Compliance Schedule dates for compliance submittals LAW-1 and EMF-1, which pertain to submittal of documentation stating that the Low-Activity Waste Facility and the Effluent Management Facility, respectively, have been constructed in compliance with the permit (construction certification).

Site access and work restrictions associated with the Covid-19 pandemic beginning March 2020 have limited the ability to complete certain requisite field activities in support of certification. As a result, completion of required Dangerous Waste Portions affecting systems, structures, and components delayed the ability to perform requisite site walk downs with Washington State Department of Ecology and Waste Treatment and Immobilization Plant personnel.

If you have any questions, please contact me, or your staff may contact Christopher J. Kemp, Director, Environmental Compliance Division, Office of River Protection, on (509) 376-7828, or Sheila Davis, Bechtel National, Inc., on (509) 827-3185.

Sincerely,

Digitally signed by GLYN D. TRENCHARD
DN: c=us, o=u.s. government, ou=department
of energy, ou=Energy IT Services, ou=Hanford
Site, ou=People, cn=GLYN D. TRENCHARD
Date: 2020.12.15 07:29:30 -08'00'

Glyn D. Trenchard, Assistant Manager
Technical and Regulatory Support
Office of River Protection

ECD:MEB

Attachment

cc: See page 2

Ms. Stephanie N. Schleif
20-ECD-0063

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December 15, 2020

cc w/attach:

J. Cantu, Ecology
M. E. Jones, Ecology
J. K. Perry, MSA
Administrative Record (WTP H-0-8)
Environmental Portal

cc w/o attach:

J. Bell, NPT
L. Contreras, YN
S. L. Dahl, Ecology
D. McDonald, Ecology
M. Murphy, CTUIR
M. Woods, Oregon Energy

Attachment
20-ECD-0063

Hanford Facility Resource Conservation and Recovery Act Permit
Modification Notification Form 24590-WTP-PCN-ENV-20-002

(12 Pages Including Cover Sheet)

Quarter Ending: 12/31/2020

24590-WTP-PCN-ENV-20-002

RCRA Operating Record Number: R605

Hanford Facility RCRA Permit Modification Notification Form
Part III, Operating Unit Group 10
Waste Treatment and Immobilization Plant

Index

Page 2 of 2: Hanford Facility RCRA Permit, Part III, Operating Unit 10, Waste Treatment and Immobilization Plant
This Class 11 modification revises compliance dates for Interim Compliance Schedule item LAW-1 in Appendix 1.3 and EMF-1 in Appendix 1.4 of the WTP Dangerous Waste Permit.

Submitted by Co-Operator:

Reviewed by ORP Program Office:

Robert Haggard 11/6/2020
Robert D. Haggard *Date*

TF Digitally signed by Thomas W. Fletcher
Date: 2020.12.07 09:28:55 -08'00'
Thomas W. Fletcher *Date*

Quarter Ending: 12/31/2020

24590-WTP-PCN-ENV-20-002

RCRA Operating Record Number: R605

Hanford Facility RCRA Permit Modification Notification Form				
Unit: Waste Treatment and Immobilization Plant	Permit Part: Part III, Operating Unit Group 10			
<u>Description of Modification:</u>				
<p>This modification is to request a revision to the Interim Compliance Dates for Compliance Schedule Submittal items LAW-1 in Appendix 1.3 and EMF-1 in Appendix 1.4. Site access and work restrictions associated with the Hanford Site posture beginning in March 2020 have limited the ability to have people onsite to complete certain requisite field activities in support of certification, including completion of required DWP-affecting systems, structures and components and the delaying the ability to perform requisite site walkdowns with Ecology and WTP/WTCC Plant Management personnel.</p> <p>Construction Certification walkdowns with Ecology for the LAW facility resumed in July 2020 to the extent allowable. Construction Certification walkdowns have not yet been scheduled for the EMF facility, for which construction activities are ongoing, and the approval/content of the EMF DWP instrument tables remains in informal review with Ecology (reference BOF-PCN-ENV-20-001). The approved EMF instrumentation tables are needed in order to complete the EMF certification permit condition.</p> <p>Based on the current plans for resumption of field work activities and the precautions in place in order to complete the necessary work and arrange access needed to meet the permit conditions, the Permittees request the following revision to the below Interim Compliance dates:</p> <ul style="list-style-type: none"> - LAW-1 for the submittal of the Low-Activity Waste construction certification documentation to the new date of June 30, 2021. This revision is due to the changes in project schedule. Additionally, a correction has been included to the permit condition reference from LAW Short Term Melter Unit III.10.11.5 to III.10.H.5. - EMF-1 for the submittal of the Effluent Management Facility construction certification documentation to the new date of September 30, 2021. This revision is due to the changes with the EMF construction certification walkdown schedule. Additionally, corrections have been included to Interim Compliance Items descriptions to revise "Appendix" to Chapter for consistency. 				
WAC 173-303-830 Modification Class:	Class 1	Class 1 ¹	Class 2	Class 3
Please mark the Modification Class:		X		
Enter relevant WAC 173-303-830, Appendix I Modification citation number: N/A				
Enter wording of WAC 173-303-830, Appendix I Modification citation:				
In accordance with WAC 173-303-830(4)(d)(i), this modification notification is requested to be reviewed and approved as a Class '1 modification. WAC 173-303-830(4)(d)(ii)(A) states. "Class 1 modifications apply to minor changes that keep the permit current with routine changes to the facility or its operation. These changes do not substantially alter the permit conditions or reduce the capacity of the facility to protect human health or the environment. In the case of Class 1 modifications, the director may require prior approval."				
Please note that source, special nuclear, and byproduct materials, as defined in the Atomic Energy Act of 1954 (AEA) are regulated at the U. S. Department of Energy (DOE) facilities exclusively by DOE acting pursuant to its AEA authority. DOE asserts that pursuant to AEA, it has sole and exclusive responsibility and authority to regulate source, special nuclear, and byproduct materials at DOE-owned nuclear facilities. Information contained herein on radionuclides is provided for process description purposes only.				
Modification Approved/Concur:	<input type="checkbox"/> Yes	<input type="checkbox"/> Denied (<i>state reason below</i>)	Reviewed by Ecology:	
Reason for denial:			S. Schleif	Date

WASTE TREATMENT AND IMMOBILIZATION PLANT
APPENDIX 1.3
WTP INTERIM COMPLIANCE SCHEDULE
WTP LOW-ACTIVITY WASTE FACILITY
CHANGE CONTROL LOG

Change Control Logs ensure that changes to this unit are performed in a methodical, controlled, coordinated, and transparent manner. Each unit addendum will have its own change control log with a modification history table. The “**Modification Number**” represents Ecology’s method for tracking the different versions of the permit. This log will serve as an up to date record of modifications and version history of the unit.

Modification History Table WTP INTERIM COMPLIANCE SCHEDULE

Modification Date	Modification Number
06/24/2020	8C.2020.3F
08/30/2018	8C.2018.3F
11/28/2017	8C.2017.8F

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**APPENDIX 1.3
WTP INTERIM COMPLIANCE SCHEDULE
WTP LOW-ACTIVITY WASTE FACILITY**

Low-Activity Waste Interim Compliance Schedule

	Compliance Schedule Submittal	Interim Compliance Date¹
	III.10.C.2	
LAW-1	Submit documentation stating the Waste Treatment and Immobilization Plant (WTP) Low-Activity Waste (LAW) Facility has been constructed in compliance with the Permit. Submit additional documentation not available for any additional proposed permit conditions, at the time of permit issuance to Ecology. Ecology will make a determination if additional permit conditions should be added.	12/31/2020 6/30/2021
	III.10.C.3	
LAW-3	Update and submit Waste Analysis Plan and associated Quality Assurance Project Plan (Chapter 3A and 3B) to Ecology for review and approval.	Complete
	III.10.C.5.	
LAW-4	Update and submit Procedures to Prevent Hazards and Inspection Schedule (Chapter 6 and Chapter 6A) to Ecology for review and approval.	Complete
	III.10.C.6	
LAW-5	Update and submit the Contingency Plan (Chapter 7) to Ecology for review and approval.	Complete
	III.10.C.7	
LAW-6	Update and submit Training Program (Chapter 8) to Ecology for review and approval.	Complete
LAW-7	Submit under separate cover the actual WTP Dangerous Waste Training Plan for incorporation into Administrative Record.	Complete
	III.10.C.8	
LAW-8	Update and resubmit the Closure Plan (Chapter 11) to Ecology for review and approval.	6/30/2020
	Containers III.10.D.10	
LAW-11	Update and submit descriptions of container management practices (Chapter 4E) to Ecology for review and approval.	Complete

Low-Activity Waste Interim Compliance Schedule

	Compliance Schedule Submittal	Interim Compliance Date¹
LAW-46	Submit the updated BOF-001 permit package associated with the Failed Melter Storage Building (Building 32).	Complete
Tank Systems III.10.E.9		
LAW-13	Update and submit engineering information for each dangerous waste tank and primary sump (Chapter 4E) to Ecology for review and approval.	Complete
LAW-14	Update and submit engineering information for each tank system ancillary equipment (Chapter 4E) to Ecology for review and approval.	Complete
LAW-15	Update and submit descriptions of tank management practices (Chapter 4E) to Ecology for review and approval.	Complete
Containment Buildings III.10.F.7		
LAW-17	Update and submit descriptions of containment building management practices (Chapter 4E) to Ecology for review and approval.	Complete
LAW Short Term Melter Unit III.10.44H.5		
LAW-25	Submit descriptions of management practices for the LAW Vitrification Miscellaneous Treatment System (Chapter 4E) to Ecology for review and approval.	Complete
LAW-26	Submit LAW Vitrification Environmental Performance Demonstration Test Plan for Ecology review and approval.	Complete
Report of Progress		
LAW-45	Update and submit Process Information (Chapter 4) to Ecology for review and approval.	Complete
Final Compliance Date		
LAW-32	Final Compliance Date (Hot Commissioning Complete).	12/31/2023

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¹The LAW compliance dates for construction completion (LAW-1) and final compliance (LAW-32) have been revised to reflect dates established in the Amended Consent Decree, *State of Washington v. Dept. of Energy*, Case 2:08-CV-08-5085-RMP (E.D. WA March 11, 2016)

WASTE TREATMENT AND IMMOBILIZATION PLANT
APPENDIX 1.4
INTERIM COMPLIANCE SCHEDULE –
WTP EFFLUENT MANAGEMENT FACILITY (EMF)
CHANGE CONTROL LOG

Change Control Logs ensure that changes to this unit are performed in a methodical, controlled, coordinated, and transparent manner. Each unit addendum will have its own change control log with a modification history table. The “**Modification Number**” represents Ecology’s method for tracking the different versions of the permit. This log will serve as an up to date record of modifications and version history of the unit.

Modification History Table APPENDIX 1.4

Modification Date	Modification Number
08/05/2020	8C.2020.4F
06/24/2020	8C.2020.3F
06/12/2019	24590-WTP-PCN-ENV-19-002 (8C.2019.Q2)
08/23/2018	8C.2018.4F
09/05/2017	8C.2017.6F

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Appendix 1.4
Interim Compliance Schedule – WTP Effluent Management Facility

	Effluent Management Facility (EMF) Compliance Schedule Submittal	Interim Compliance Date
	III.10.C.2	
EMF-1	Submit documentation stating the EMF has been constructed in compliance with the Permit.	12/31/2020 09/30/2021
	III.10.C.3	
EMF-3	Update and submit for approval Waste Analysis Plan and associated Quality Assurance Project Plan (Chapter 3A and 3B) to Ecology for review and approval.	Complete
	III.10.C.5	
EMF-4	Update and submit for approval Procedures to Prevent Hazards and Inspection Schedule (Chapter 6 and Appendix-Chapter 6A) to Ecology for review and approval.	Complete
	III.10.C.6	
EMF-5	Update and submit the Contingency Plan (Chapter 7) to Ecology for review and approval.	Complete
	III.10.C.7	
EMF-6	Update and submit Training Program (Chapter 8) to Ecology for review and approval.	Complete
EMF-7	Submit under separate cover the actual WTP Dangerous Waste Training Plan for incorporation into Administrative Record.	Complete
	III.10.C.8	
EMF-8	Update and submit the Closure Plan (Chapter 11) to Ecology for review and approval.	6/30/2020
	III.10.C.11	
EMF-9	Update and submit Risk Assessment Work Plan, revised in consultation with Ecology to address the Direct-Feed Low-Activity Waste configuration.	Complete
	Containers III.10.D.10	
EMF-11	Update and submit descriptions of container management practices (Appendix-Chapter 4G) to Ecology for review and approval.	Complete
	Prior to Installation III.10.E.9	
EMF-13	Update and submit engineering information for each dangerous waste tank (Appendix-Chapter 4G) to Ecology for review and approval.	Complete

	Effluent Management Facility (EMF) Compliance Schedule Submittal	Interim Compliance Date
EMF-14	Update and submit engineering information for each tank system ancillary equipment (Appendix Chapter 4G) to Ecology for review and approval.	Complete
Report of Progress		
EMF-45	Update and submit descriptions of tank management practices (Appendix Chapter 4G) to Ecology for review and approval.	Complete
EMF Misc. Units Systems III.10.M.A		
EMF-16	Submit engineering information for EMF Miscellaneous Treatment Unit Systems.	Complete
Final Compliance Date		
EMF-32	Final Compliance Date (Hot Commissioning Complete).	12/31/2023



This document has been digitally signed using the Electrosign process.

Document for Signature

Document Number: 24590-WTP-PCN-ENV-20-002 **Rev:** 0

Participants	Signature	Completed	Status	Result	Comments
Signers 11/6/2020 1:52 PM					
Haggard, Robert		11/6/2020 2:00 PM	Completed	Approve	
Final Approver 11/6/2020 2:00 PM					
Haggard, Robert		11/6/2020 2:10 PM	Completed	Approve	