



0076879

STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

3100 Port of Benton Blvd • Richland, WA 99352 • (509) 372-7950

April 15, 2008

Ms. Shirley J. Olinger, Manager  
Office of River Protection  
United States Department of Energy  
P.O. Box 450, MSIN: H6-60  
Richland, Washington 99352

Mr. William S. Elkins, Project Director  
Bechtel National, Inc.  
2435 Stevens Center Place, MSIN: H4-02  
Richland, Washington 99354

RECEIVED  
APR 21 2008  
EDMC

Re: Submittal of Hanford Facility RCRA Permit Modification Notification Form  
24590-HLW-PCN-ENV-07-003; Class <sup>1</sup> Modification to the Hanford Facility Resource  
Conservation and Recovery Act (RCRA) Permit, Dangerous Waste Portion, for the  
Treatment, Storage, and Disposal of Dangerous Waste, Part III, Operating Unit 10  
(Waste Treatment and Immobilization Plant), WA7890008967

Dear Ms. Olinger and Mr. Elkins:

The Department of Ecology approves the referenced Class <sup>1</sup> Modification submitted  
March 17, 2008. The approved Hanford Facility RCRA Permit Modification Notification Form  
is enclosed.

Modification 24590-HLW-PCN-ENV-07-003 provides the updated *Leak Detection Capability in  
the High Level Waste Facility* (24590-HLW-PER-M-04-002, Revision 3). This replaces the  
current permit document in Appendix 10.18.

During Ecology's formal review of the document, editorial changes were identified that would  
clarify Table 7.1. We recommend that you:

1. Change the title of the table to "Maximum Leak Distances for Each Room."
2. Remove the second (\*\*) footnote.

These changes are editorial and do not require immediate action. Please make these changes in  
the next revision of the document.

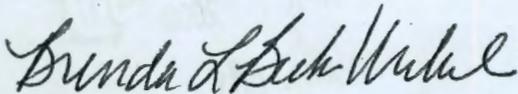


Ms. Olinger and Mr. Elkins  
April 15, 2008  
Page 2

During the transition period from permit drawings to engineering source drawings, the parties agree you may show in phantom items not requiring an installation inspection or inclusion in the Independent Qualified Registered Professional Engineer report. Ecology is approving the design changes identified in the Permittees' submittal. Decisions on the regulation of items shown in phantom will be made later. At the end of the transition period, permit submittals will contain engineering source documents. The submittals will be incorporated into the permit as described in Ecology Publication # 07-05-006 ([www.ecy.wa.gov/biblio/nwp.html](http://www.ecy.wa.gov/biblio/nwp.html)).

If there are any questions, contact me at 509-372-7882 or David Becker at 509-372-7990.

Sincerely,



Brenda Becker-Khaleel  
WTP Permit Writer  
Nuclear Waste Program

trw/jc  
Enclosure

cc electronic w/enc:

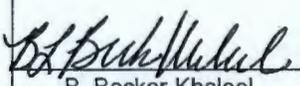
Dave Bartus, EPA  
John Eschenberg, USDOE  
Lori Huffman, USDOE  
Tony McKarns, USDOE  
Gae Neath, USDOE  
Don Sommer, USDOE  
William Taylor, USDOE  
Julie Colby, BNI  
Brad Erlandson, BNI  
Peggy Fisher, BNI  
Stan Hill, BNI  
Dennis Klein, BNI  
Sandi Murdock, BNI  
Suzette Thompson, FHI  
Phil Peistrup, WGI

cc w/enc:

Administrative Record: Tank Waste Treatment Requirements ✓  
Environmental Portal  
Hanford Operating Record General File  
USDOE-ORP Correspondence Control

Quarter Ending 3/31/2008

24590-HLW-PCN-ENV-07-003

Hanford Facility RCRA Permit Modification Notification Form					
Unit: <b>Waste Treatment and Immobilization Plant</b>		Permit Part & Chapter: <b>Part III, Operating Unit 10</b>			
<u>Description of Modification:</u>					
The purpose of this Class <sup>1</sup> modification is to update the <i>Leak Detection Capability in the HLW Facility</i> (24590-HLW-PER-M-04-002) in Appendix 10.18 of the Dangerous Waste Permit. The following permit document is submitted to replace the document currently in Appendix 10.18.					
Appendix 10.18					
Replace:	24590-HLW-PER-M-04-002, Rev 2	With:	24590-HLW-PER-M-04-002, Rev. 3		
This modification requests Ecology approval and incorporation into the permit the specific changes to the document that are identified by revision bars. Revisions incorporate minor changes to Maximum Leak Travel Distance, including a comment provided by Ecology to clarify the distance to the HOP sumps from the HEMEs/SBS areas, and editorial changes. The following identifies the changes on the attached document.					
<ul style="list-style-type: none"> <li>Revised Table 6.1 to update "Maximum Leak Travel Distance" column. Changes to the travel distance are based on the issued design drawings and the current data in the HLW 3D Model. Changes to the travel distance are insignificant and do not result in changes to the final leak detection calculations in column "24-Hour Leak Rate Detected (rounded)".</li> <li>Revised Table 6.1 to correct the total travel distance to sumps HOP-SUMP-00003 and HOP-SUMP-00008. This revised travel distance includes the distance from the HEMEs/SBS bermed area located above these sumps. Changes to the travel distance do not result in changes to the final leak detection calculations in column "24-Hour Leak Rate Detected (rounded)".</li> <li>Revised Table 7.1 to add HEMEs/SBS bermed areas (Room H-0106 and H-0117).</li> <li>Added footnotes to Table 6.1 and 7.1 for clarification.</li> </ul>					
WAC 173-303-830 Modification Class: <sup>1 2</sup>		Class 1	Class <sup>1</sup>	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 <sup>1</sup> 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 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."					
Modification Approved: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No (state reason for denial)		Reviewed by Ecology:			
<u>Reason for denial:</u>		 4/15/08 B. Becker-Khaleel Date			

<sup>1</sup> Class 1 modifications requiring prior Agency approval.

<sup>2</sup> 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 a Class <sup>1</sup>, if applicable.

Quarter Ending 3/31/2008

24590-HLW-PCN-ENV-07-003

---

**Hanford Facility RCRA Permit Modification Notification Form**  
**Part III, Operating Unit 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  
Update *Leak Detection Capability in the HLW Facility* in Appendix 10.18 of the Dangerous Waste Permit.

Submitted by Co-Operator:

Reviewed by ORP Program Office:

D. A. Klein

2/11/08

S. J. Olinger

3/11/08

D. A. Klein

Date

S. J. Olinger

Date