



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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August 29, 2019

19-NWP-142

Brian T. Vance, Manager
Office of River Protection
United States Department of Energy
PO Box 450, MSIN: H6-60
Richland, Washington 99352

Valerie McCain, Project Director
Bechtel National, Inc.
2435 Stevens Center Place, MSIN: H4-02
Richland, Washington 99354

Re: Approval of 24590-LAW-PCN-ENV-19-001, Class ¹ Modification to the *Hanford Facility Resource Conservation and Recovery Act Permit, Dangerous Waste Portion, Revision 8C, for the Treatment, Storage, and Disposal of Dangerous Waste*, Part III, Operating Unit Group 10, Waste Treatment and Immobilization Plant (WTP Permit), WA7890008967

Reference: See page 2

Dear Brian T. Vance and Valerie McCain:

The Department of Ecology approves the referenced Class ¹ Modification. The approved Hanford Facility RCRA Permit Modification Notification Form is enclosed.

This modification provides the updated Mechanical Data Sheet for the Low-Activity Waste (LAW) Secondary Offgas/Vessel Vent Process System Caustic Scrubber (24590-LAW-MKD-LVP-00011, Rev. 7).

The enclosure lists the changes and replaces the corresponding permit Mechanical Data Sheet in Appendix 9.6 of the WTP Permit.

If there are any questions, please contact Yoana Lucatero, WTP Permit Writer, at yoana.lucatero@ecy.wa.gov or (509) 372-7917.

Sincerely,

Suzanne Dahl
Dangerous Waste Permit Manager
Nuclear Waste Program

yl/aa
Enclosure

cc: See page 2



RECEIVED

SEP 04 2019

EDMC



Reference: Letter 19-ECD-0061, dated July 19, 2019, "Submittal of Hanford Facility Resource Conservation and Recovery Act Permit Modification Notification Form 24590-LAW-PCN-ENV-19-001, Mechanical Data Sheet"

cc electronic w/enc:

Dave Bartus, EPA	Gail Laws, WDOH
Dave Einan, EPA	Debra Alexander, Ecology
Mary Beth Burandt, USDOE-ORP	Jennifer Cantu, Ecology
Tom Fletcher, USDOE-ORP	Annette Carlson, Ecology
Roger Gordon, USDOE-ORP	Nitya Chandran, Ecology
Lori Huffman, USDOE-ORP	Suzanne Dahl, Ecology
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Bob Haggard, BNI	Nancy Ware, Ecology
Felice Presti, BNI	BNI Correspondence Control
Dan Robertson, BNI	Environmental Portal
Donna Yasek, BNI	Hanford Facility Operating Record
Jon Perry, MSA	USDOE-ORP Correspondence Control
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Ken Niles, ODOE	

cc w/enc:

Susan Leckband, HAB
Hanford Administrative Record
NWP Central File

cc w/o enc:

Matt Johnson, CTUIR
Jack Bell, NPT
Laurene Contreras, YN
Alyssa Buck, Wanapum

Quarter Ending Sept 30, 2019

24590-LAW-PCN-ENV-19-001

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

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Page 2 of 3: Hanford Facility RCRA Permit, Part III, Operating Unit 10, Waste Treatment and Immobilization Plant

Replace the Mechanical Data Sheet for the Low-Activity Waste (LAW) Secondary Offgas/Vessel Vent Process System Caustic Scrubber in Appendix 9.6 of the Dangerous Waste Permit (DWP)

Submitted by Co-Operator:

Reviewed by ORP Program Office:

Robert D. Haggard 2/8/19
Robert D. Haggard Date

Thomas W. Fletcher 2/17/19
for Thomas W. Fletcher Date

Quarter Ending Sept 30, 2019

24590-LAW-PCN-ENV-19-001

Hanford Facility RCRA Permit Modification Notification Form

Unit: Waste Treatment and Immobilization Plant	Permit Part: Part III, Operating Unit 10
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Description of Modification:

The purpose of this Class 1 prime modification is to replace Mechanical Data Sheet for the Low-Activity Waste (LAW) Secondary Offgas/Vessel Vent Process System Caustic Scrubber, in Appendix 9.6 of the Dangerous Waste Permit (DWP)

Appendix 9.6			
Replace:	24590-LAW-MKD-LVP-00011, Rev 6	With:	24590-LAW-MKD-LVP-00011, Rev 7

This modification requests Ecology approval and incorporation into the permit for the specific changes to this Mechanical Data Sheet. The document includes changes provided in applicable document change forms (e.g., DCN, SCN, SDDR, FCN, FCR, etc.). In addition, the mechanical data sheet includes changes associated with the resolution to comments on change documents since issuance of the last revision of the permitted document.

Significant changes incorporated on the Mechanical Data Sheet (24590-LAW-MKD-LVP-00011, Rev. 7) for the Low-Activity Waste (LAW) Secondary Offgas/Vessel Vent Process System Caustic Scrubber are summarized below:

- Incorporated SDDRs 24590-WTP-SDDR-MS-16-00043 and 24590-WTP-SDDR-MS-16-00073 by design change
- Incorporated SDDR 24590-WTP-SDDR-MS-16-00052 by reference
- Incorporated Seller data to update maximum operating volume, total volume, vessel weights, and packing
- Updated or corrected cyclic data including normal operating pressure typo for the water gauge to psig. conversion and nozzle temperature updates
- Revised or added notes to incorporate data supplied and/or verified by the Seller including but not limited to operating volume, total volume, vessel weights, and packing
- Added AEA note
- Updated nozzle schedule and notes to provide Seller wall thickness and nozzle elevation data based on final fabrication
- Updated or corrected Process Conditions to incorporate Seller data
- Updated Process Condition Notes to incorporate Seller data and process calculation information
- Updated Attachment 1 – References for Mechanical Data Sheet 24590-LAW-MKD-LVP-00011, Rev. 7

This PCN updates information in Appendix 9.6 to reflect current design. If the re-evaluation results in future design changes, the changes will be reviewed by Ecology in subsequent permit modifications.

In accordance with Permit Condition III.10.C.2.e, this permit modification includes redlined changes to Table 4E-2, updating the materials of construction and total volume for the LAW Caustic Scrubber consistent with the information provided in 24590-LAW-MKD-LVP-00011, Rev 7.

WAC 173-303-830 Modification Class:	Class 1	Class 11	Class 2	Class 3
Please mark the Modification Class:		X		


Enter relevant WAC 173-303-830, Appendix I Modification citation number:

Enter wording of WAC 173-303-830, Appendix I Modification citation:

Quarter Ending Sept 30, 2019

24590-LAW-PCN-ENV-19-001

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."

<p>Modification Approved/Concur: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> Denied (state reason below)</p> <p><u>Reason for denial:</u></p>	<p>Reviewed by Ecology:</p> <p> S. Dahl</p> <p><u>8/29/19</u> Date</p>
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