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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
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March 7, 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

Re: Submittal of Hanford Facility RCRA Permit Modification Notification Form
24590-HLW-PCN-ENV-06-026; Class ¹ 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

Reference: Letter dated March 7, 2008, from E. Fredenburg, ECY, to S. J. Olinger,
USDOE-ORP, and W. S. Elkins, BNI, "Steam Cleanout of Plugged Piping" *6076447*

Dear Ms. Olinger and Mr. Elkins:

The Department of Ecology approves the subject Class ¹ Modification submitted
January 22, 2008. The approved Hanford Facility RCRA Permit Modification Notification Form
is enclosed.

Modification 24590-HLW-PCN-ENV-06-026 provides the Piping and Instrument Diagrams
(P&ID) for the High-Level Waste (HLW) Facility Melter Cave Support Handling System (HSH)
Decontamination Tanks: The P&IDs listed below will be added to appendix 10.2 of the permit.

- 24590-HLW-M6-HSH-P0004, Revision 0 (HSH-TK-00001)
- 24590-HLW-M6-HSH-P20004, Revision 0 (HSH-TK-00002)

The tanks are currently in the permit on the HLW Radioactive Liquid Waste Disposal (RLD)
System P&IDs (24590-HLW-M6-RLD-P0003 and 24590-HLW-M6-RLD-P20003).
The removal of the tanks from the RLD P&IDs will be submitted under permit modification
notification form 24590-HLW-PCN-ENV-06-015.

During our review, Ecology raised questions regarding the design and use of the steam cleanout
process to clear a plugged drain line. Ecology prepared the referenced letter requesting
additional information on all steam cleanout processes in the Waste Treatment Plant.



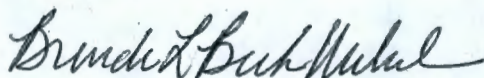
Ms. Olinger and Mr. Elkins
March 7, 2008
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Ecology is approving the subject permit modification because the HSH steam cleanout lines are currently in the permit and do not affect the overall design of the tank.

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 and will be incorporated into the permit as described in Ecology Publication # 07-05-006 (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/aa
Enclosure

cc electronic w/enc:

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

cc w/enc:

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

Quarter Ending 12/31/2007

24590-HLW-PCN-ENV-06-026


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

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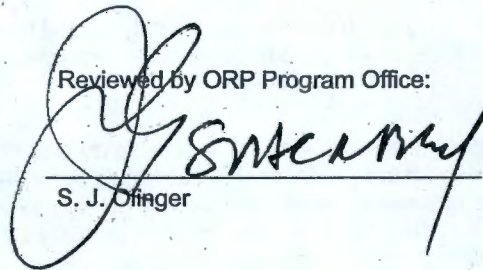
Page 2 of 4: Hanford Facility RCRA Permit, Part III, Operating Unit 10, Waste Treatment and Immobilization Plant
Update HLW Vitrification Building Piping and Instrumentation Diagrams (P&IDs) for the HLW
Decontamination Tanks (HSH-TK-00001 and HSH-TK-00002) in Appendix 10.2 of the Dangerous Waste
Permit.

Submitted by Co-Operator:

Reviewed by ORP Program Office:


D. A. Klein

12/18/07
Date



S. J. Olinger

1/22/08
Date

Quarter Ending 12/31/2007

24590-HLW-PCN-ENV-06-026

Hanford Facility RCRA Permit Modification Notification Form

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

The purpose of this Class 1 prime modification is to update the Piping and Instrumentation Diagrams (P&IDs) for the HLW Decontamination Tanks (HSH-TK-00001 and HSH-TK-00002). These tanks were previously shown on the HLW Radioactive Liquid Waste Disposal (RLD) System P&IDs 24590-HLW-M6-RLD-P0003 and 24590-HLW-M6-RLD-P20003 incorporated in Appendix 10.2 of the permit. The following permit P&IDs are submitted for inclusion in Appendix 10.2:

Appendix 10.2	
Add:	24590-HLW-M6-HSH-P0004 Rev 0
	24590-HLW-M6-HSH-P20004 Rev 0

The HLW Decontamination Tank design details have been relocated from the RLD system permit P&ID to the HSH system P&IDs. The updated RLD P&IDs showing the removal of Decontamination Tanks will be submitted with a separate permit modification notice (24590-HLW-PCN-ENV-06-015).

This modification incorporates changes provided in applicable document change forms (e.g., DCN, SCN, SDDR, FCN, FCR, etc.) and changes associated with the vendor design submittals since the issuance of the last revision of the permitted RLD drawings. This modification requests Ecology approval and incorporation into the permit of the HSH system P&IDs showing the design consistent with the permit Process Flow Diagram (24590-HLW-M0-HSH-P0075). The following identifies the significant types of design changes on the attached drawings:

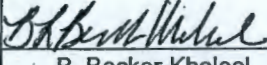
- Added drain line to the Decontamination Tank from the parts washer
- Deleted jumper valves from the tank drain line

The following is a list of outstanding change documents that have not been incorporated into this modification:
None

WAC 173-303-830 Modification Class: ^{1 2}	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 ¹1 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) Reason for denial:	Reviewed by Ecology: <div style="text-align: center;">  B. Becker-Khaleel </div> <div style="text-align: right;"> 3/7/08 Date </div>
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¹ Class 1 modifications requiring prior Agency approval.

² 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 '1, if applicable.