STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
Richland Field Office
3100 Port of Benton Blvd., Richland, WA 99354 • 509-372-7950

August 25, 2022 22-NWP-131

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

Wesley H. Bryan, President
Washington River Protection Solutions
PO Box 850, MSIN: H3-04
Richland, Washington 99352

Re: The Department of Ecology (Ecology) Review of Response to Dangerous Waste Compliance Inspection on March 25, 2021, at the Double Shell Tank System, RCRA/State Site ID: WA7890008967, Nuclear Waste Program (NWP) Compliance Index No.: 21.735

Reference: See page 2

Dear Brian T. Vance and Wesley H. Bryan:

Ecology has reviewed your response letter and enclosures, received on August 12, 2022 (reference). Your letter responded to item of non-compliance one identified in Ecology's March 25, 2021, inspection of the Double Shell Tank System. Ecology disagrees with processes outlined in Attachments 4 and 5 from Letter 22-ECD-001763 and using the term "active portion" to define areas subject to required emergency equipment in Building Emergency Plans (BEPs) and Facility Response Plans (FRPs).

On August 23, 2022, Ecology, the United States Department of Energy (USDOE), and the Hanford Mission Integrations Solutions (HMIS) agreed to the below language to be included in the BEP/FRP template instructions relating to including emergency equipment in Treatment, Storage, and Disposal control rooms:

> *"For emergency equipment in control rooms the permittee shall coordinate with Ecology on a case-by-case basis to determine if the equipment will be subject to permit modification requirements and categorized accordingly in the subsection tables below."*

The agreement of this language resolves the remaining item of dispute of including fire control emergency equipment in Building 274-AW in the BEP for Tank Farms. Per the new agreed to language above, this will be resolved in the Hanford Dangerous Waste Revision 9 Permit meetings with Ecology.

To close out item of non-compliance one from Ecology's March 25, 2021, inspection of the Double Shell Tank System (Index No. 21.735), submit the BEP for Tank Farms, RPP-27869, with the agreement changes incorporated from our workshops as referenced in Attachment 3 from Letter 22-ECD-001763. Since this same BEP is used for the Tank Side Cesium Removal System (TSCR), a separate action to submit a permit modification, classified under Washington Administrative Code (WAC) 173-303-830, Appendix I, will also need to be submitted to Ecology.

If you have any questions relating to permitting, please contact Annette Carlson at (509) 578-8721 or annette.carlson@ecy.wa.gov. If you have questions related to this compliance matter or need further information, please contact me at (360) 481-9830 jared.mathey@ecy.wa.gov.

Sincerely,

Mathey, Jared W. (ECY)
2022.08.25 12:04:17
-07'00'

Jared Mathey
Dangerous Waste Compliance Inspector
Nuclear Waste Program

tla

cc: See page 3

Reference:

1. Letter 22-ECD-001763, received on August 12, 2022, Ecology, "Response to the Washington State Department of Ecology Letter 21-NWP-168 Double-Shell Tank Systems Dangerous Waste Compliance Inspection Number 21.735"

cc electronic:

Dave Einan, EPA
Michelle Mullin, EPA
Matt Quarterman, EPA
Kaylin Burnett, USDOE
Duane Carter, USDOE
Paul Hirschman, USDOE
Tony McKarns, USDOE
Joe Sondag, USDOE
Bryan Trimberger, USDOE
Allison Wright, USDOE
Holly Bowers, WRPS
James Hamilton, WRPS
Jay Warwick, WRPS
Jon Perry, HMIS
Steve Szendre, HMIS
Mason Murphy, CTUIR
Jack Bell, NPT
Laurene Contreras, YN
ERWM Staff, YN
Janice Catrell, HAB
David Reeploeg, Hanford Communities
Max Woods, ODOE

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Dan McDonald, Ecology
Nina Menard, Ecology
John Price, Ecology
Kyle Rucker, Ecology
Adam Shaffer, Ecology,
NWP Compliance Index File: 21.735
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Hanford Administrative Record
Hanford Facility Operating Record
HMIS Correspondence Control
USDOE Correspondence Control
WRPS Correspondence Control

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