



DEPARTMENT OF
ECOLOGY
State of Washington

Response to Comments

**Modification of the *Hanford Facility*
Resource Conservation and Recovery Act
Permit for the Treatment, Storage, and
Disposal of Dangerous Waste, Part III,
Operating Unit Group 10 (WA7890008967)
Waste Treatment and Immobilization Plant
Analytical Laboratory Operations, 24590-
LAB-PCN-ENV-16-002**

July 3, 2017, through September 1, 2017

Summary of a public comment period and responses to comments



November 2017

Publication no. 17-05-013

PUBLICATION AND CONTACT INFORMATION

This publication is available on the Department of Ecology's (Ecology) website at <https://fortress.wa.gov/ecy/publications/SummaryPages/1705013.html>

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Response to Comments

Modification of the *Hanford Facility Resource Conservation and Recovery Act Permit for the Treatment, Storage, and Disposal of Dangerous Waste*, Part III, Operating Unit Group 10 (WA7890008967)

**Analytical Laboratory Operations,
24590-LAB-PCN-ENV-16-002**

July 3, 2017, through September 1, 2017

Department of Ecology
Nuclear Waste Program
3100 Port of Benton Boulevard
Richland, Washington 99354

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INTRODUCTION

The Washington State Department of Ecology's Nuclear Waste Program (Ecology) manages dangerous waste within the state by writing permits to regulate its treatment, storage, and disposal.

When a new permit or a significant modification to an existing permit is proposed, Ecology holds a public comment period to allow the public to review the change and provide formal feedback. (See [Washington Administrative Code \[WAC\] 173-303-830](#) for types of permit changes.)

This Response to Comments document is being issued to address the public comments received during the comment period held July 3 through September 1, 2017. The document supports the draft permit modifications submitted for public comment by the U.S. Department of Energy, Office of River Protection and Bechtel National Inc. (the Permittees).

The purpose of this Response to Comments document is to:

- Describe and document public involvement actions.
- List and respond to all significant comments received during the public comment period.

This Response to Comments is prepared for:

Comment period:	Class 3 Modification for the WTP Permit, Analytical Laboratory Operations, 24590-LAB-PCN-ENV-16-002, July 3 through September 1, 2017
Permit:	<i>Hanford Facility Resource Conservation and Recovery Act (RCRA) Permit for the Treatment, Storage, and Disposal of Dangerous Waste, Part III, Operating Unit Group 10 (WA7890008967), Waste Treatment and Immobilization Plant</i>
Permittees	U.S. Department of Energy, Office of River Protection (USDOE-ORP) and Bechtel Nation Inc. (BNI)
Original issuance date:	September 27, 1994

To see more information related to the Hanford Site and nuclear waste in Washington, please visit our website: www.ecy.wa.gov/programs/nwp.

REASONS FOR ISSUING THE PERMIT

The Permittees submitted a draft permit modification to Ecology that incorporates new and modified information focused on the operations of the Analytical Laboratory (Lab). The modification also provides the operating details under the Direct-Feed Low-Activity Waste (DFLAW) configuration.

Ecology and the Permittees participated in a series of facilitated workshops to determine the design and scope of an integrated operating permit. The result was the development of Permit Conditions III.10.L, Analytical Laboratory Specific Operating Conditions.

Updates to Permit Condition Tables III.10.E.D and III.10.E.P are provided to reflect the current operations information.

Revisions needed to support the operations of the Analytical Laboratory in this modification include:

- Chapter 4H, Analytical Laboratory
- Chapter 6A, Inspection Plan
- Chapter 8, Personnel Training
- Part III, WTP Unit Specific Permit Conditions

PUBLIC INVOLVEMENT ACTIONS

Ecology and the Permittees encouraged public comment on the Analytical Laboratory Operations Class 3 Modification to the WTP Permit during a 60-day public comment period held July 3 through September 1, 2017.

The following actions were taken to notify the public:

- Mailed a public notice announcing the comment period to 1,500 members of the public.
- Copies of the public notice were distributed to members of the public at Hanford Advisory Board meetings.
- Placed a public announcement legal classified advertisement in the *Tri-City Herald* on July 2, 2017.
- Emailed a notice announcing the start of the comment period to the [Hanford-Info email list](#), which has 1,450 recipients.

The Permittees held a public meeting on August 3, 2017, at 5:30 p.m. at Richland Public Library. Two members of the public attended the meeting, and two members of the public participated via webinar. No hard copy comments were collected during the public meeting.

The Hanford information repositories located in Richland, Spokane, and Seattle, Washington, and Portland, Oregon, received the following documents for public review:

- Transmittal letter
- Fact Sheet
- Draft Class 3 Permit Modification to the WTP Permit for Analytical Laboratory Operations, 24590-LAB-PCN-ENV-16-002

The following public notices for this comment period are in [Appendix A](#) of this document:

1. Public notice (Fact sheet)
2. Classified advertisement in the *Tri-City Herald*
3. Notices sent to the Hanford-Info email list

LIST OF COMMENTERS

The table below lists the names of organizations or individuals who submitted a comment on the Analytical Laboratory Operations Permit modification. The comments and responses are in [Attachment 1](#).

Commenter	Organization
Mike Conlan	Citizen
Anonymous	Citizen
Judith W. Ginn	Citizen
Larry Lowther	Citizen
Sylvia Haven	Citizen
Scott Kiffer	Citizen
Confederated Tribes and Bands of the Yakama Nation	Tribal

ATTACHMENT 1: COMMENTS AND RESPONSES

Description of Comments:

Ecology accepted comments from July 3 through September 1, 2017. This section provides a listing of the comments we received during the public comment period and our responses, as required by [RCW 34.05.325](#)(6)(a)(iii). Comments are grouped by individual and each comment is addressed separately.

Comment from: Mike Conlan

I-1-1

1. Remove all nuclear waste,
2. Do not allow anymore nuclear waste into the facility,
3. Replace all the single storage tanks,
4. Stop all the nuclear leakage entering the Columbia River

Response to: Mike Conlan

I-1-1

Ecology is working to ensure that long-term storage, treatment and disposal of the waste is protective of human health and the environment.

The proposed permit changes are not to allow new waste, but to better manage the waste already at Hanford.

Single-shell tanks are not in the scope of this comment period. Ecology does agree the tanks pose a threat. We believe a better approach to addressing it is to remove the waste from the single-shell tanks and put it in the compliant double-shell tanks to prepare for eventual treatment in the Waste Treatment Plant now being built. The operation of the Analytical Laboratory is a positive step to eventual treatment of tank waste currently stored at Hanford. Stopping any potential nuclear waste from impacting the Columbia River is not within the scope of the WTP Permit. Prevention of groundwater and surface water impacts are addressed in operations associated with other units.

Comment from: Anonymous Citizen

I-2-1

THE FACT SHEET MISREPRESENTS THE MATURITY OF THE LABORATORY DESIGN

The Fact Sheet calls out again that Ecology elected to conduct "phased" permitting, and that it is now time to replace design information for the laboratory with operating information. However, there is no indication that the laboratory design is integrated with the new Effluent Management Facility processes, samples, and chemical compositions. The EMF will send samples with novel compositions to the laboratory and down the laboratory drains, and the permit package is silent on the chemistry.

Where are the revised mass balance, sample schedule, and corrosion evaluation to show that the materials installed for the lab will work for EMF sample solutions, which have much higher chloride and fluoride content? The Fact Sheet misrepresents the readiness for DFLAW Operations. How many samples will come from EMF? How will they be delivered? Is the sample transfer adequately analyzed in the safety basis, or has ORP abandoned again any regard for maintaining employee exposures as low as reasonably achievable (ALARA)?

I-2-2

CHAPTER 4H.1 PROPOSES TO DELETE RELEVANT DESIGN INFORMATION
Chapter 4H.1 proposes to delete language that "the laboratory design will be validated with information from tank utilization modeling of the process tanks and operational research modeling of the treatment process, as appropriate." What is the justification for deleting this information? The models of the treatment processes, including EMF, PT, and HLW are not present. Where are the data to show that this laboratory will support the EMF additional samples that were not envisioned in the original design? Where are the data to show how the laboratory will handle the samples from the unknown future re-designs of PT and HLW? Where is the design and operability report for the laboratory, consistent with the LAW and HLW D&O reports? These answers are needed before Ecology deletes the contents that are still relevant. The analytical laboratory design cannot be verified to perform its original function or its "bait and switch" DFLAW function.

I-2-3

THE PROPOSED PERMIT MODIFICATION IGNORES THE SAFETY IMPACT OF THE "DUMBING DOWN" OF THE LABORATORY FROM HAZARD CATEGORY 3 TO A "RADIOLOGICAL FACILITY"

In January of 2016, the Department of Energy approved the startup of the WTP Analytical Laboratory as a "Radiological Facility" instead of the Hazard Category 3 Facility it was required to be in order to support the full WTP operations (as described in the Tank Closure and Waste Management EIS alternatives.) See letter 15-NSD-0040. Objections to this, including at DOE Headquarters, were overruled. What this means is that the laboratory will be started up based on a Bechtel "formal assessment" instead of a DOE Operational Readiness Review (ORR). The laboratory will become contaminated without the rigor and readiness needed for HLW and PT Processing. Procedures will not address the complete consideration of the potential for receipt of higher activity wastes and solutions. The laboratory will not be ready in the event of receipt of misrouted HLW feed, nor will it be easy to "review up" to an ORR, once the equipment is contaminated. The permit modification statement that the analytical laboratory hot cells will "not be operated" is ludicrous. The systems and tanks are interconnected, and the deferred WTP startup (configured as originally promised to the public) under the "baseline" configuration will be more hazardous to personnel as the "unintended" consequences of this bait and switch action are realized. Cold tests in the hot cells will be impacted/prevented. The hot cells will be pressed into premature service due to capacity limitations, or due to mistakes. The Environmental Impact Statement analyzed the whole plant in operation together. Piecemeal laboratory operations are not evaluated for the resulting cost and mounting risk.

I-2-4

THE MATURITY OF THE ASX INTEGRATED SAMPLING SYSTEM IS UNKNOWN

Page 4H.2 says the laboratory is served by the ASX sampling system, which has been fraught with problems. What is the integrated state of the ASX design? How many nonconformance reports are unresolved? What are the ALARA consequences of not having the ASX system at the EMF?

I-2-5

QUALITY ASSURANCE DATA INCLUDING COMMERCIAL GRADE DEDICATION FOR THE ANALYTICAL LABORATORY IS NOT RESOLVED

Condition Report 24590-WTP-GCA-MGT-17-11831 (May 31, 2017) shows inadequate closure of a PIER dating from 2012. Unacceptable closure included missing laboratory testing requests for materials testing, and non-compliance with the commercial grade dedication (COD) plan - a repeat finding associated with a previous fine, and associated with fraud allegations. Four of thirteen items were defective. In addition, Condition Report 24590-GCA-MGT-17-00927, June 15, 2017, shows that substandard and quality indeterminate materials may have been installed in the plant: "The installations of all CM materials to date is suspect and quality indeterminate to date ... " Indeterminate quality is a basis to stop work, including the processing of this permit modification request.

I-2-6

BECHTEL VIOLATED THE DW PERMIT BY INSTALLING A LABORATORY DRAIN PRIOR TO APPROVAL OF THE PERMIT MODIFICATION

Condition Report 24590-WTP-GCA-MGT-17-00996, June 26, 2017, reports that Bechtel installed a low point drain line associated with Lab Vessels RLD-VSL-00164 and RLDVSL-00165 before the permit was issued, in acknowledged violation of permit conditions. This is a continuation of construction without a valid design.

There is also no indication that the EMF sample compositions (high in chloride and fluoride) were considered in the selection of materials for the drain lines. In addition, piping to/from Pretreatment (PT) to the laboratory suffers from confusion in materials selection, per Condition Report 24590-WTP-GCA-MGT-17-01009, June 28, 2017. There is a high probability that EMF will be required to continue operations when PT starts up, given that the PT effluent to ETF has never met the ETF acceptance criteria. As a result, the Laboratory Effluent - as affected by EMF samples, needs to be compared to the piping materials selection.

I-2-7

THE PERMIT MODIFICATION IS SILENT ON DANGEROUS WASTE OPERABILITY FOR SOLID WASTE HANDLING

The proposed permit modification does not address the operability requirements of the solid waste handling system at the analytical laboratory. Several WTP solid waste handling system areas (which handle dangerous waste) do not have a dedicated pathway to introduce clean drums/containers to contaminated facilities. The clean

drums and the full, potentially contaminated drums enter and exit through the very same pathway, leading to potential doses to personnel that are not ALARA, and leading to potential contamination issues. This needs to be addressed.

1-2-8

DOCUMENTS ARE BEING SUPPRESSED AND WTP FRAUD ALLEGATIONS LINGER

Ecology stated previously (Publication 17-05-003) that "simply put, there is no fraud ... " This statement has no basis. The Fraudulent Claims Act Case (2: 13-CV-05013-EFS) was "settled" for a payment of \$125,000,000. As stated in the settlement agreement, the contractors admitted no wrongdoing, and the United States did not concede that its claims were not well founded. So what is a member of the public to do?

A further look illuminates the deliberate cover up of records that the public could use to decide for themselves. The government has abdicated its fiduciary duty in this case and the Judge has a conflict of interest.

The attached article from the December 13, 2000 edition of the Oregon Daily Journal of Commerce states that the original Bechtel Inc. Contract for the WTP was written in haste, and that U.S. District Court Judge Edward Shea was personally asked to "oversee the hiring" of Bechtel, for a project/contract that will "move forward no matter who is president in the decades to come." The intent of the hiring in which Judge Shea assisted was to have a contract for which the project could not be cancelled (and perhaps where Bechtel could not be fired?). And the schedule pressure - to hurry the hiring to keep the project on schedule for a 2007 startup, was noted.

In an amazing coincidence, U.S. District Court Judge Edward Shea was the Judge overseeing False Claims Act Case 2: 13-CV-05013-EFS in which Bechtel, the company he personally helped to hire, was a defendant.

Judge Shea has selectively unsealed only a few of the records in this case, and has actively protected approximately a million pages of records, by stating they were "confidential" Bechtel Information.

- DOE should release the "sealed" evidence from case 2:13-CV-05013-EFS and post it electronically in the DOE Public Reading Room, due to its wide public interest. The records produced at WTP are paid for by the taxpayer, and therefore should be available to the public, so the public can judge for themselves whether there is fraud at DOE/Bechtel/WTP, including at the analytical laboratory.

DOE Prime Contracts are supposed to be publicly available, and original contracts are posted on the Hanford Web page for the CSC Original Contract, CHPRC Original Contract, PHMC Original Contract, WHC Original Contract, and the WRPS Original Contract, most with the original contract management plans. But the Bechtel (BNI)

original WTP contract is missing,4 and so is the original contract management plan.

- DOE should publish, consistent with federal law, the original Bechtel contract for WTP, so the public can compare what was requested for the WTP laboratory versus the watered down version we are asked to accept in this colossal game of "bait and switch."
- DOE should also publish any side-agreements associated with this contract that were "arranged" or "assisted" by Judge Shea.

See, for example, <http://www.hanford.gov/?page=1046>.
<http://www.hanford.gov/page.cfm/DOE-ORPPrimeContracts>.

1-2-9

THE COVER-UP CONTINUES

On June 15, 2017, Bechtel prohibited employees from using transportable media, such as thumb drives, CDs, or DVDs, even though this is impacting and impeding their day-to-day work. This sends a clear message that anyone who finds a way to take information on such a device from the project to the Department of Justice, or the Inspector General, will be fired. No more "million" pages for the next fraud allegation. See Condition Report 24590- WTP-GCA-MGT-17-01038, which shows that this prohibition is being "electronically enforced." This means that taxpayer dollars have been used to lock up the WTP computer systems to the detriment of work efficiency and transparency. This is an action not covered by the WTP contract. The planned "waiver" process is a waste of money. Employees are already required to protect Official Use Only documentation and proprietary data. Extending a ban to all data is another example of waste, fraud, and abuse. DOE should halt this wasteful and abusive practice, which is aimed at stifling future whistleblowers.

1-2-10

ORP PROTECTS BECHTEL BY ERASING NUCLEAR SAFETY FINDINGS

The corrective actions process required by NQA-1 does not envision the approach being used by ORP to "disappear" findings. Of most recent interest is Letter 17-NSD-0006, which was issued first on March 21, 2017 with a Priority Level 2 Finding with multiple examples of inadequate detail in safety evaluations. This letter was reissued on July 5, 2017, not for minor editorial changes, but to eliminate the finding and the required causal analysis and corrective action plan. ORP noted that Bechtel was "pursuing improvements" to the safety evaluation process and supporting engineering activities. It is a violation of NQA-1 to close a finding to a promise of future work. It is even more a violation to go back in time and alter a report more than three months after the fact - and long after a corrective action plan from the original finding (in 45 days) was due. This is an attempt by ORP to re-write history in order to misrepresent the lack of health of nuclear safety at WTP. This "culture" of revision applies to all parts of the plant including the laboratory.

The magical elimination of findings has occurred before, in Letter 16-WTP-0014, in which a Priority Level 2 Finding was reduced to 4 Priority Level 3 Findings associated with Bechtel's shoddy corrective actions system. The same letter number was issued on February 2, 2016 and then reissued on June 17, 2016, with significantly different conclusions. Use of correspondence to back-change a report is unethical.

- DOE should request that the DOE Headquarters QA Audit Team return to ORP to revisit the prior finding (EM-PA-15-14-F-03, July 1, 2015), that ORP was mischaracterizing findings to a lower level than warranted. Every ORP surveillance, audit, and review since the original HQ Audit should be evaluated for additional examples.

I-2-11

EXAMPLES OF FRAUD AND ABUSE CONTINUE

Bechtel has failed to perform audits for over \$1.3 Billion in subcontracts and refused to turn over documents as required by law and the WTP contract. See letters 17-FIN-0029 (February 28, 2017), 17-FIN-0055 (June 19, 2017), and 17-CPM-0035 (July 7, 2017). What these letters say is:

Hanford Finance and ORP did not ensure BNI fully complied with its contract which requires audit of its cost reimbursable subcontracts. Specifically, Clause 1.112 of the BNI contract requires subcontractor costs to be audited in accordance with DEAR 970.5204-9(c), "Audit of Subcontractors' Records." BNI has not arranged for or audited the approximately \$1.3 billion in cost type subcontracts in a timely manner and BNI does not have a DOE Contracting Officer (CO) approved subcontract audit plan. At the time of this report, ORP is in the process of formally directing BNI to comply with the contract clause.

BNI has denied ORP's auditors (CohnReznick, LLP) access to required records (e.g. various labor distribution reports, pay stubs for non-manual employees, evidence of overtime approval, etc.) to complete the WTP 2009 - 2013 Direct Cost audit. This resulted in a formal Denial of Access letter issued by CohnReznick to BNI on January 5, 2017. BNI not providing audit required records is a violation of the WTP contract. Specifically, Clause 1.118 requires BNI to provide the records in accordance with DEAR 970. 5204-79(d), "Inspection, copying, and audit of records." At the time of this report, ORP is in the process of formally directing BNI to comply with the contract clause.

The denial of access to records to the auditors in the case of the subcontract audits is a repeat of Bechtel's prior denial of records to the DOE Office of the Inspector General, in the case of an OIG Whistleblower Investigation. The cowardly OIG did not insist that Bechtel turn over contractually-required documents, stating: " ... at the end of the day, despite efforts by senior Department officials, we did not have access to the full inventory of documents which we felt were necessary to conduct our review. Thus, we were unable to complete our inquiry ... " It appears Bechtel's success in getting the OIG

to cancel an investigation by stonewalling may have encouraged similar behavior in the case of the subcontract audits. This culture does not provide the public with confidence in Bechtel's behavior or DOE's competence or oversight ability.

See <http://energy.gov/sites/prod/files/2014/10/files/TG-0923.pdf>

I-2-12

For the reasons above this permit modification should be rejected. In addition, the State of Washington should consider revoking the tax exemption granted to Bechtel in pursuit of this project. Letter CCN-025107, December 5, 2001, indicates that Bechtel claimed an exemption to a lower tax rate based on performing work for "cleaning up radioactive waste and other byproducts of weapons production and nuclear research and development" per RCW 82.04.263. In responding to the Washington Department of Revenue, Bechtel faxed a copy and thanked DOE for reviewing this letter and pointing out an error. Since December of 2001, Bechtel has cleaned up no radioactive waste. As a result, this exemption should be reevaluated, and the correct and full tax should be applied.

Response to: Anonymous Citizen

I-2-1

Some facility modifications are planned to be performed in the Analytical Lab to integrate with EMF. These modifications were submitted as a Class 2 modification with the Effluent Management Facility (EMF) Underground Transfer Line Permit Modification and approved by Ecology on July 6th, 2017. The Analytical Lab modifications entail installing additional piping to connect the EMF and the WTP Analytical Lab; and installing a new valving to isolate RLD-VSL-00164 from RLD-VSL-00165.

Under the WTP baseline configuration the Analytical Lab will receive samples from WTP Pretreatment Facility. The concern that EMF will have "novel compositions" is not accurate. Under the DFLAW configuration, the WTP Analytical Lab is projected to receive and analyze approximately 3,000 samples per year. Approximately 30% of the samples analyzed at the WTP Analytical Lab are expected to be received from EMF. The EMF samples will be manually transferred to the Analytical Lab in a shielded container for safe handling (e.g., ALARA). The Analytical Lab was designed to receive a broad range of samples and chemical compositions. The process chemistry, including fluoride and chloride content, of EMF samples was evaluated in EMF Process Stream Tables (24590-BOF-M3-V17T-00001001 and V17T-00001002). These EMF Process Stream Tables were part of the Class 3 Modification to the WTP Permit for the EMF Secondary Containment. This modification was available for two public comment periods and was approved by Ecology on September 5th, 2017.

I-2-2

The Permittees proposed the text deletion because the Analytical Lab construction is complete. The text is removed from the permit and maintained in the Operating Record. This permit modification provides operating details for the Analytical Lab under the DFLAW configuration.

The Analytical Lab capacity will not be affected by the addition of EMF samples because PT and HLW Facilities will not be operating concurrently. The current DFLAW configuration does not allow EMF to operate when PT and HLW Facilities are in operation.

Neither DOE nor Ecology are aware of any unknown future designs which would change the scope of samples analyzed by the Analytical Laboratory. Like any permitting process, if in the future any adjustments to the Analytical Lab are needed, they will be assessed against the approved WTP Permit and if necessary the permit will be modified in accordance with Appendix I of WAC 173-303-830.

DOE does not intend to commission a team to perform a Design and Operability Review of the Analytical Lab.

I-2-3

The Washington State Department of Ecology regulates management of dangerous waste under Washington Administrative Code 173-303. Ecology does not have regulatory authority for management of nuclear operations or the radiological fraction of mixed waste. This authority is maintained by the Department of Energy under the Atomic Energy Act.

The Analytical Lab Operating Permit Modification (24590-LAB-PCN-ENV-16-002) submitted by the Permittees is based on the DFLAW configuration for WTP. The hot cells and RLD-VSL-00165 in the Analytical Lab will remain in standby until the Permittees are ready to operate WTP in the baseline configuration. The Permittees submitted a Class 2 Permit Modification which included design changes to allow for systems and tanks to be reconfigured to allow for operations of the Analytical Lab in the DFLAW configuration. This Class 2 Modification was approved by Ecology on July 6th, 2017. Prior to implementing the baseline configuration, the Permittees will be required to modify the WTP Permit in accordance with Appendix I of WAC 173-303-830, to update or revise any necessary portions of the Analytical Lab.

The Department of Energy evaluated the DFLAW concept in the Final Tank Closure and Waste Management EIS and concluded that it was bounded by the analysis in Alternative 2B.

I-2-4

There are 16 open Condition Reports against the ASX System. Some of the items are scheduled for closure during start up testing. The Permittees use the WTP Corrective Action Management Program to identify issues. As Analytical Lab commissioning activities continue, the Permittees will track identified issues, through resolution, in their Corrective Action Management Program.

The ASX System is not planned to be used for EMF samples. The EMF samples are expected to be manually transferred in a shielded container to the Analytical Lab.

I-2-5

The Permittees use the WTP Corrective Action Management Program to identify issues and track them through resolution. As Analytical Lab commissioning activities continue, the Permittees will generate additional condition reports to resolve identified issues prior to start up.

I-2-6

The Permittees notified Ecology of the non-compliance on June 28th, 2017, and provided formal notification of the non-compliance to Ecology on July 26th, 2017. Although construction was started without having an approved permit, the Permittees did have a valid design. The design had been issued for public comment with the Underground Waste Transfer Lines Class 2 Modification. Ecology approved the permit modification on July 6th, 2017 and the change became effective August 7th, 2017. All work stopped on the impacted portion of the facility until the permit modification was approved and effective.

Material selection for the EMF and Analytical Lab piping was completed in accordance with WAC 173-303-640(3)(a). WTP DWP Appendix 7.9, Material Selection Documentation, includes Materials for Ancillary Equipment (24590-WTP-PER-M-02-002), which addresses material selection for corrosion protection of WTP ancillary waste containment equipment. EMF sample compositions were considered when making these piping material selections.

The current DFLAW configuration design does not allow EMF to operate when PT is in operation, nor does it allow operation of RLD-VSL-00165. When HLW and PT Facilities become operational, the WTP will change to the baseline configuration. It is anticipated that when the WTP is operating in the baseline configuration, RLD-VSL-00165 will receive Analytical Lab liquid wastes from the hot cells but EMF will not be operating. While WTP is operating in the baseline configuration, EMF will remain in standby until the treatment of the tank waste has been completed.

Pretreatment Facility construction is not completed and has not generated any effluent for discharge to a TSD facility (i.e., ETF). In accordance with WTP Permit Condition

III.10.3.e.iv, the Permittees are required to meet the authorized receiving TSD facility's waste acceptance criteria prior to waste stream transfer.

I-2-7

The permit addresses waste management activities in Section 4H.1.2.1, Waste Management Area (WMA). The Permittees will stage empty waste containers in room A-0139D. The new waste containers will be moved into Analytical Lab rooms and Waste Management Area (A-0139) as needed. Revisions to Section 4H.1.2.1 have been made to clarify this text.

LAW and EMF samples received at the Analytical Lab will be processed within the analytical hoods and any unused portions will be discharged to RLD-VSL-00164 to reduce worker exposure. Any sample material, not discharged to the tank system, will be packaged in the hood prior to being placed into a waste container. Waste containers will then be transported to room A-0139. Waste containers will be managed as described in Section 4H.1.2.1, Waste Management Area (WMA), of the Analytical Lab, Chapter 4H of the WTP Permit.

While the full waste containers share the same pathway and space as the empty waste containers, precautions (e.g., ALARA principles) are taken to ensure that no contamination exists on the outside of the filled containers.

I-2-8

Ecology is not involved in the Department of Energy's litigation or contracting efforts. Oversight of Bechtel is a requirement of the Department of Energy under Federal Acquisitions Requirements.

I-2-9

The Permittees are required to maintain a Facility Operating Record in accordance with the Hanford DWP Permit Condition I.E.8, Duty to Provide Information, Permit Condition II.I, and Chapter 12, Reporting and Recordkeeping, of the WTP Permit. Ecology ensure that the Permittees maintain the documentation required by the Dangerous Waste Permit and ensure that the necessary documentation is held in the operating record as detailed above. The process Bechtel National Inc. (BNI) uses to maintain electronic data is outside the scope of this modification and Ecology's authority.

I-2-10

The Washington State Department of Ecology regulates management of dangerous waste under Washington Administrative Code 173-303. Ecology does not have regulatory authority for management of nuclear operations or the radiological fraction of mixed waste. This authority is maintained by the Department of Energy under the Atomic Energy Act.

I-2-11

Issues identified concerning the Bechtel National Inc. (BNI) contract with the Department of Energy or the DOE Office of Inspector General are outside the scope of this modification. Ecology is not involved in the Department of Energy's oversight of their contract with BNI, nor it's interactions with DOE Office of Inspector General.

I-2-12

Tax exemption is not within the scope of this modification. Ecology as the regulating authority for WTP, ensures that the facility is designed, constructed, and operated in accordance with WAC 173-303, Dangerous Waste Regulations to ensure that human health and the environment are protected.

Comment from: Judith W. Ginn

I-3-1

Dear Sir or Madam,

I am very concerned that Hanford is not being well cleaned up. It is right on the Columbia River and the Columbia River water goes on to the Pacific to pollute an even larger area. Please ensure that all the nuclear pollution is cleaned up so that it does not get into ground water or river water. I could go on, but won't. Just don't let the clean up stop until it is really and truly done.

Thank you very much,

Response to: Judith W. Ginn

I-3-1

Ecology is working to ensure that the long-term storage, treatment, and disposal of waste is protective of human health and the environment. Ecology shares your concern for the delays in the cleanup and the state is committed to the protection of human health and the environment.

Comment from: Larry Lowther

I-4-1

I urge you to engage in a thorough clean-up of nuclear waste along the Columbia River around Hanford. We need to make sure that the ground water, the source of drinking water for many people, is perfectly safe. We do not want the Washington State equivalent of Flint, Michigan.

Response to: Larry Lowther

I-4-1

Ecology is working to ensure that the long-term storage, treatment, and disposal of waste is protective of human health and the environment. Stopping any potential waste from impacting the Columbia River is not within the scope of the Analytical Laboratory Operations permit modification. Groundwater and surface water impacts are addressed in operations associated with other units.

Comment from: Sylvia Haven

I-5-1

Dear Washington State Ecology:

The clean-up record at Hanford is disgraceful and threatens the citizens of Washington State and the entire country.

Therefore Ecology must NOT grant a new "class 3 permit modification". There is a lot of cleanup that needs to happen first to protect the waters of the Columbia.

Please get your priorities straight!

Response to: Sylvia Haven

I-5-1

Ecology is working to ensure that the long-term storage, treatment, and disposal of waste is protective of human health and the environment. The scope of this modification focuses on the operating details of the Analytical Laboratory and is classified by Ecology under WAC 173-303-830. The State of Washington is committed to the protection of human health and the environment.

Comment from: Scott Kiffer

I-6-1

The Permittees must wait for previous Class 3 permit modifications to be approved before requesting a subsequent Class 3 modification based on revisions to content still pending approval. Please determine any necessary corrective and/or enforcement actions as a result of Permit Change Notification 24590-LAB-ENV-PCN-16-002.

I-6-2

The Permittees must provide a basis to justify the use of the present tense in Chapters 4H, 6A and 8. Please provide documented evidence such as final design drawings approved for construction, stamped and sealed by a registered Professional Engineer, and accompanied by the necessary design reports sufficient to demonstrate conformance to accepted standards in accordance with WAC 196-27A-020(1)(b)

I-6-3

The Permit must identify the requirements of the WAC with which only the Owner can comply pursuant to WAC 173-303-810(13)(b)(ii). Please acknowledge the need to designate a Co-Owner for the Permit and to revise the operating conditions of the Permit in a manner sufficient to identify, establish, and enforce liability as a result of noncompliance with the conditions of the Permit

Response to: Scott Kiffer

I-6-1

It is Ecology's position that no corrective actions are necessary. There is no regulatory requirement that would support a corrective action. The Permittees were proactive and communicated with Ecology that there would be an overlap of modifications. In discussions with the Permittees, it was determined that they could clearly define which text was open for public comment and which text was tied to an existing modification. They identified the text as we requested and clearly communicated that in the modification. Due to the size of the Hanford Dangerous Waste Permit, overlapping comment periods may be inevitable and have occurred in the past. When Ecology drafts the permit for the second public comment period the public will see only the text that applies to the Analytical Lab as the other text (gray shaded) has been approved and is now effective.

I-6-2

Ecology believes that the Permittees are following the Rules of Professional Conduct and Practice under WAC 196-27A.

Consistent with Permit Condition III.10.C.9.g, the Permittees will place as-built drawings into the operating record within twelve months of completing construction.

I-6-3

As delineated in Chapter 1 of the WTP Permit, USDOE-ORP is the Owner/Operator and BNI is the Co-Operator of the Waste Treatment and Immobilization Plant.

When DOE and the Co-Permittee certifies information, it is done in accordance with WAC-173-303-810(13)(a). DOE is both an Owner and Co-Operator so WAC 173-303-810(13)(b)(ii) would not apply in this situation.

Comment from: Confederated Tribes and Bands of the Yakama Nation

T-1-1

YN ERWM Program (YN) comments (and requests) on the Class 3 Modification to the Hanford site RCRA Permit for WTP Analytical Laboratory Operations and Chapters SEPA: Providing the SEPA checklist for public review promotes better understanding of the SEPA process and enhances public knowledge of the unit. Please provide link to submitted SEPA checklists.

T-1-2

Chapter 4H:

General: YN requests that future modifications not overlap comment periods such that it results in both strikeouts and 'gray areas to be ignored.' Sentence structure is difficult to understand.

T-1-3

General: YN notes that slopes for flat-roof construction is generally a minimum of 2%. We have concerns regarding use of a minimal 1% slope design in the construction of the WTP facilities due to the consistency of the waste streams and the potential of build-up/blockage and failure of facility operations. We ask Ecology to consider use of its Omnibus Authority to require more slope percentage in the design of future WTP facilities.

T-1-4

General: YN understands this chapter is process information for laboratory operations. We do appreciate the over-all inclusion of additional design, process details, and site information however, YN requests that most if not all, of the proposed deleted text be retained in the appropriate sections for clarity and comprehension of the overall operations of the LAB facility. Facility description as proposed is not robust. Container and 2nd Containment leaks and spills are not adequately addressed in Chapter 4H. YN requests more details. Examples:

- o While Table 4H-1 does show basic function, it is too simplistic and without the support text, operations of and integration of systems is unclear. An example is the discussion of the two types of laboratories (i.e. AHL and ARL) and which system does what and how they are integrated, how they will operate both in 'baseline' [a term which is not explained] versus DFLAW configuration. Another example is the deletions of discussions of the ASX system and the Air Emissions Controls [systems YN considers to be a critical systems] and use of terms 'majority of' or 'small percentage of samples from other facilities' rather than defined facilities, numbers, procedures, methodologies,
 - o Overall, there needs to be more details and clarification as to what procedures are in place for the management of samples and wastes managed in SAAs.
 - o YN suggests inclusion of references to appropriate Permit Chapters and/or Addendum within Chapter 4H text.
 - o YN requests edit to Chapter 4H to include reference document to support claims that
-

waste feed contains maximum of 10% total organic carbon.

T-1-5

As LAB container storage areas are not designed to meet the requirements of WAC 173-303-630(7) and WAC 173-303-806(4)(b), YN requests clarification in Chapter 4H if there is or is not a fire control sprinkler system for LAB and what measures are in place to ensure safe secondary containment for containers in the event of activation of the system.

T-1-6

YN requests more clarifying details in Chapter 4H regarding how process knowledge, administrative controls, and the active ventilation systems prevent the formation or release vapors that could harm human health or the environment resulting from any of the LABs operations (including hood fumes and precautions in the container storage areas and during transport). YN requests clarification in Chapter 4H if and how raw and potable water will be supplied to the LAB and any necessary protectiveness/preventative measures to be taken to ensure the safety of human health and the environment.

T-1-7

YN requests Ecology ensure supporting documents remain valid (e.g. 24590-LAB-PER-M-02-001, Rev0- flood volumes).

T-1-8

YN requests clarification of management of newly generated wastes, and how it will be recorded in the Hanford Site Waste Information Tracking system, and recorded unit-specific facility operating record.

T-1-9

YN requests clarification of statements regarding non-operational use of vessel RLD-VSL-00165 but its use to maintain ventilation in the DFLAW configuration and over-all lack of discussion of the ventilation system.

T-1-10

YN requests details of fume hoods and the C3 & C5 ventilation and HEPA filtration systems.

T-1-11

YN requests that Lab Packs be identified as managed in accordance with WAC 173-303-161. YN is concerned with storage of these on the floors of the container storage areas.

T-1-12

YN requests inclusion of information regarding satellite accumulation areas and their management according to WAC 173-303. YN is concerned with potential over-accumulation of wastes and their disposal path.

T-1-13

YN requests details of any miscellaneous non-radioactive dangerous waste containers to be included within Chapter 4H.

T-1-14

YN requests clarification of statement on line 4, page 4H.7 that states the sample shipping and receiving area will provide an area with low contamination potential and reduces the need for decontamination of casks and containers for off-site radiological release. YN understands this section is proposed for deletion, however we are concerned that this is an accepted assumption and that off-site radiological releases are not being given adequate consideration. Lines 10-16 seem to indicate that checks for contamination and decontamination procedures are in place but this text is deleted. YN requests clarification in this section and likewise throughout the Chapter.

T-1-15

YN requests additional details regarding the transfer of liquid wastes from the RLD vessels returned back into the WTP process.

T-1-16

YN requests identification of types of containers or transportation casks and manifest requirements as needed [suggest a Table].

T-1-17

Figure 4H-2/3 provided examples of drum configurations and secondary containments in the Waste Management Areas. YN requests for better identification of drum configurations to be allowed within each area and secondary containment details.

T-1-18

YN suggests addition of a chapter glossary and acronyms list

T-1-19

YN suggests removal of following at bottom of pages: Key: Mods associated with BOF-15-002 = and continuing training Mods associated with LAB-16-002 = Training Category

T-1-20

Section 4H.1.1: Keep all deleted text and/or incorporate it into Section 4H.1.2. Add offgas system components, HVAC/HEPA filters to list of waste streams.

T-1-21

Section 4H.1.2.1: Clarify management of unaccepted containers. Overall, include more details to the management of containers. Responsible waste management personnel should be identified by title and a reference to table identifying required trainings.

T-1-22

Section 4H.1.2.2: YN requests retention of deleted details on the LIMS and other deleted text in these sections.

T-1-23

Sections 4H.1.3 & 4 [and all subsections]: YN requests retention of deleted details into appropriate sections.

T-1-24

Sections 4H.1.3 & 4 [and all subsections]: YN requests clarification as to the structural integrity of the facility and including floors (both for container and tank systems). Although construction designs of LAB's container storage/waste management areas are such that an integrity assessment is not required, the very fact that heavy equipment will be moving the containers, there should be no question as to the soundness of the floor or the associated load-out/waste transfer areas. [WAC 173-303-283(3) and WAC 173-303-810(6)].

T-1-25

Sections 4H.1.5 [and all subsections]: YN suggest rewrite and integration of information into a more cohesive single section. (Perhaps this is a consideration for all of Chapter 4H subsections).

T-1-26

Section 4H.2 and subsections: YN requests additional details regarding the secondary containment for those vessels which are located in areas not routinely accessible.

T-1-27

Section 4H.2 and subsections: YN requests clarifications as to what procedures are in place to inspect the containment systems for these areas.

T-1-28

Section 4H.2 and subsections: YN requests clarification as to what measures are to be taken to repair/replace equipment in non-accessible areas.

T-1-29

Section 4H.2 and subsections: YN requests clarification if there is any anticipated use of tanker trucks for vessel RLD-VSL-00164 discharges.

T-1-30

Section 4H.2.4 and subsections: YN requests clarification if stated periodic wash-downs of cells sumps or vessels is defined somewhere in a table of schedules or an operations procedures document.

T-1-31

Deleted Sections 4H.2.2 thru 5 and subsections: YN requests retention of text. YN also requests clarification of measures for waste packing for waste transport and any waste acceptance criteria needed at disposal sites.

T-1-32

Figures: General:

- o YN suggests all figures footnote locations of Permitted process flow diagrams.
- o YN requests clarification as to why vessel RLD-VSL-00163 is not regulated under the Permit.
- o 4H-1: For clarity of understanding the design of the facility, a three dimensional figure would be more helpful since the Permitted vessels are below ground surface.
- o 4H-2: Clarify if there is an external door off A-0139D.
- o 4H-3: Clarify what table or appendix will have identification of specific secondary containments used for each waste container. The concern is whether there is to be identification of secondary containment type by each specific container ID.
- o 4H-4: Suggest two figures; one for the Baseline configuration and one for DFLAW [as shown, it conflicts with proposed Chapter 4H]. Suggest inclusion of sumps and/or pumps and where liquids are sent. Suggest identification of vessels RLD-VSL-00164/00165 also as C3 & C5 vessels as text calls them out by these too. Suggest deletion of tanker-truck as this is inconsistent with Chapter 4H text.
- o 4H-5: Line identified with yellow arrow CV system is confusing; does this indicate airflow path? What tank is it leaving? Diagram is too small. Similar questions for Figure 4H-6.
- o 4H-6: Figure 4H-4 shows liquids from sumps go to PTF vessel -00044, where else does effluent from vessel -00165 go?

T-1-33

Tables:

- o Table 4H-1: YN considers the ASX a critical system and requests inclusion as such into the Permit pursuant to WAC 173-303-815(2)(b).
- o Table 4H-3: YN requests review of values for heights and shell thickness. Flooding document-24590-LAB-PER-M-02-001, Rev 0- has different numbers. Clarify.
- o Table 4H-4: YN requests review of values for secondary containment height. Values do not seem to match liner heights. Clarify.
- o 4H-5: Noted some differences between this table and Table C-9 and Table III.10.E.P and values in 24590-LAB-PER-M-04-0001, Rev) table for leak detection capacity. Clarify.

T-1-34

Chapter 6A:

General:

- o As these Chapters are including within documents for review in this modification, YN requests edits to Chapters 6 & 6A to require corrective action/repairs or remedial action taken be retain in the WTP Operating record until closure.
- o YN requests edits to Chapters 6 & 6A to identify title of personnel responsible for authorizing corrective actions for non-emergency problems and a Permit Condition specifying the limits of response times.

T-1-35

YN suggests addition of a chapter glossary.

T-1-36

In tables where frequency is at least every seven days YN requests this is not to result in an inspection on day one and the next inspection thirteen days later.

T-1-37

Section 6A.1: YN requests update to include LAB facility.

T-1-38

Section 6A.5.1: YN requests inclusion of details for Corrective Actions. Generally, the Chapter needs to reflect with more details the inspection activities for LAB's container areas.

T-1-39

Table 6A-2a: YN requests edits to the inspection requirements to include any protective coatings of the waste management areas (including outside loading/waste transfer areas to detect signs of releases of dangerous wastes). YN also requests inspections verify signs are present, legible from a distance of 50ft for those entry doorway/areas where labels are prohibited due to ALARA concerns. Clarify if the containment areas are under negative pressure.

T-1-40

Table 6A-2b: YNB requests Ecology consider more frequent nondestructive examinations. Footnote #1 not defined. Footnote #2 not identified in table. Asterisk footnote not identified. YN disagrees with exemption of any sumps from nondestructive examination; equipment has a shelf life whether used for dangerous waste management or not. Edit Footnote #4 to include text which defines how inspections are performed.

T-1-41

Table 6A-3b: General: Explain rationale for all the TBD in this table and all others.

T-1-42

Tables 6A-3 thru 6A-7b are all 'examples'. What document, if not Chapter 6A will equipment, etc required to be inspected be identified? YN requests these tables be populated and modifications be made accordingly if necessary.

T-1-43

Chapter 8:

General: Identify location of the WTP Dangerous Waste Training Plan.

T-1-44

YN requests retention of Task-Specific Training section language and identification of applicable portions of Permit Attachment 5.

T-1-45

Table 8-1: YN requests clarification within Chapter text of responsibilities and roles of the various personnel in the Implementing Category.

T-1-46

Table 8-2: YN requests tank system management training for position of Laboratory Manager.

T-1-47

YN requests additional clarification in Chapter 8 regarding the frequency and/or periodicity of train, and competency or evaluation testing and requirements specific to personnel working in each WTP facility.

T-1-48

Attachment 2: YN comments on Part III LAB Unit Specific Operating Conditions: See additional comments on attached edited Conditions file Attachment #3.

Description: Unit descriptions should be for informational purposes only and should summarize information provided on the Part A Form. They are not operational conditions and do not require numerical identification.

T-1-49

YN requests clarification regarding air emission and water quality samples. Are these sample from LAB operations? YN requests the LAB retain capability to analyze air emission samples for samples analyzed by LAB.

T-1-50

Clarify sentence; Outsource laboratories are used to analyze the majority of very low-activity samples such as water quality and air emission samples.

T-1-51

What is the relevance of following text to the operations of the LAB? . Outsource laboratories are also being used to analyze DST system unit characterization samples. Clarify or delete if not relevant to the operations of the LAB.

T-1-52

YN requests brief discussion of coordination of closure of facility.

T-1-53

YN requests edits the Part A form & Chapter 4H description text to also reflect text changes.

o The words 'features' and capability are rather ambiguous. Compliance with the WAC will ensure safe, efficient, etc operations.

T-1-54

YN requests the LAB have its unit specific Chapters.

T-1-55

YN requests the LAB conditions 1. provide list of LAB specific critical systems and their definitions 2. Include definitions found in the WTP or Hanford Site Permit. 3. If no unit-specific definitions and/or acronyms, retain category as (RESERVED).

T-1-56

Conditions:

III.10.L.1: General waste management: edits/comments: Appendix 3A does not discuss LAB waste acceptance criteria, etc. Edits needed.

T-1-57

III.10.L.2.a: The Condition should identify defined waste acceptance criteria and does not. Edits needed. YN requests replacement of this condition with requirement to use a LAB unit-specific WAP which incorporated all applicable requirements for general waste management as identified in III.10.C.2 and Appendix 3A. YN notes III.10.C.2 condition requires updates to include all waste management actions of the LAB facility.

T-1-58

III.10.L.2.b: YN requests LAB-specific Performance Standard Condition be defined and included within this section (and within the Closure Plan). Clean closure should be the standard. [see WAC 173-303- 610(2)(a-b)]

T-1-59

III.10.L.2.b.i: In addition to the proposed conditions, YN requests development of conditions in case of problems with by-pass events, hood fumes and the HVAC system. None of these areas are covered in Chapter 4H. Proposed III.10.L.2.b.i: contains suggested text for by-pass events.

T-1-60

III.10.L.2.c: In addition to the proposed condition, YN requests edit of III.10.L.2.c or development of conditions to ensure compliance with WAC 173-303-810(6). Parts I & II Conditions do not have this requirement.

T-1-61

III.10.L.3 WASTE ANALYSIS: YN requests verification that a laboratory quality assurance (QA) program meeting the requirements of SW-846, Chapter 1, Section 4.4 (EPA 1997a) will be/has been prepared before initiation of LAB operations.

T-1-62

YN requests verification that measures are in place to manage suspect, or unidentified samples and resolutions.

T-1-63

YN requests verification that 24590-WTP-RPT-MGT-04-001, Regulatory Data Quality Objectives Optimization Report is up to date and accurately identifies analytical sampling methods, sample preservation, storage and holding times as these are to be used at LAB .YN also request list of analytes identified in Chapter 3A be reviewed and confirmed.

T-1-64

III.10.L.4.ii: Note, no changes just moved under recordkeeping. YN also requests clarification of location of LAB operational procedures such as sample handling and chain of custody, decontamination of equipment, etc and development of additional permit conditions as needed to ensure procedures are in place.

T-1-65

III.10.L.4.c: YN requests clarification as to why requirements for WAC 173-303-380(1)(h thru q) are not included in this section.

T-1-66

III.10.L.4.d: YN requests inclusion of this adaptation of Part I.E.10 to ensure accurate documentation of these areas of equipment operations. [WAC 173-303-815(2)(b)(ii)]

T-1-67

III.10.L.6 PREPAREDNESS AND PREVENTION: YN requests edits to Chapter 6, Section 6.4.1- Unloading/loading Operations, to include procedures for LAB or a new III.10.L.6 condition to address receipt and transfer of LAB containers. YN requests similar edits to Chapter 4H.

T-1-68

III.10.L.8.b: Reference to II.I.2 was not found in Rev 8C on Ecology website. Suggest review of Parts I & II. Clarification requested.

T-1-69

III.10.L.11.a: YN requests Closure Plan for review along with all other referenced Chapters. Ecology is asking the public to agree with permit conditions which are based on documents not open for review unless they are somehow attached to this specific modification in a way that comments will be considered within the scope of this modification. (For example YN does not agree with the assumption that coatings can be deemed to meet the clean debris surface standard without sampling of some type.) The Permittees must comply with all WAC 173-303-610.

T-1-70

Attachment #3: YN comments on the LAB Unit-specific operating conditions.

General:

1. YN requests the LAB have unit-specific Chapters which contain the applicable sections of WAC 173-303, the Hanford Site RCRA Permit Parts I & II and the over-arching requirements of PART III, OPERATING UNIT GROUP 10 SPECIFIC CONDITIONS WASTE TREATMENT AND IMMOBILIZATION PLANT. Include all appropriate definitions and acronyms. Permittees (and operations staff) must concurrently review four different documents (and modifications) in order to ensure compliance with the Dangerous Waste regulations. With the advent of electronic files, to compile all needed information into a single source for the facility-specific Permit operating conditions would not seem to be a hardship or a duplication of efforts to the extent that this is not done.

T-1-71

2. YN requests the facility-specific Operating Conditions for the Analytical Laboratory (LAB) better identify where requirements are found (e.g., III.10.L.4 directs the Permittees to corresponding chapters but does not identify them). Moreover, Ecology's website identifies supporting documents as Chapters, however the website's Unit Specific Conditions identify these as Addendum and Appendices. This inconsistency results in difficulty in understanding the proposed Analytical Laboratory (LAB) Specific Operating Conditions. YN requests edits to the online-Unit-Specific Conditions to identify Addenda as Chapters and Appendices as Addendum to these Chapters and similarly within the proposed LAB-specific operating conditions.

T-1-72

3. YN requests DOE and Ecology review and update all supporting Chapters, Addendum, Appendices, etc to reflect LAB operations. Please ensure and verify that all Rev 8C Permit Part III operating unit group 10-WTP supporting documents remain accurate, applicable, and reflected the Permit Chapters and Conditions for LAB. (e.g., Chapter 6 & Chapter 6A, Section 6A.5.1 text do not address container inspections specific to LAB nor does it include Corrective Actions for other identified areas. Noted Table 6A-2a has a schedule but it needs edits to include checking for deterioration of not only the concrete foundation but also any protective coatings.) Other examples of documents which may need updating are Appendices 7 & 11-24590-LAB-PER-M-04-0001, REV 0 & -0002, REV 0, 24590-WTPPERHV-02-001-REV 1, and 24590-WTP-PER-M-08-001,REV 0).

T-1-73

4. YN requests all LAB Permit Chapters and cited Conditions be provided during the Ecology public comment period. It is difficult to make comprehensive comments on Conditions without them.

T-1-74

Specific Comments: YN offers the following edits to the format and substance of LAB's unit specific operating conditions. We are requesting these edits for consistency, and to better clarify requirements to comply with the overall RCRA Permit conditions, those portions of the larger WTP facility permits as well as these unit specific conditions. Highlighted text indicates requested changes. Additional comments on these Conditions are found in Attachment #2 above.

PART III, OPERATING UNITS OPERATING UNIT GROUP 10 WTP Analytical Laboratory

The Analytical Laboratory is designed to ensure compliance with WAC 173-303 requirements, efficient WTP DFLAW, HLW, LAW, and Pretreatment Facility operations process control, authorization basis, and waste form qualification requirements. The Analytical Laboratory will coordinate the management of samples that will be outsourced and analyzed at offsite laboratories (e.g., XXX). Outsource laboratories are used to analyze the majority of very low-activity samples such as water quality and air emission samples. Outsource laboratories are also being used to analyze DST system unit characterization samples. Analytical methods and equipment selected

to support laboratory analyses will be in accordance with applicable regulatory and permitting requirements. Samples are collected and transported from the processing facilities to the Analytical Laboratory via the autosampling (ASX) system, a dedicated pneumatic transfer system to the hot cell for high-activity samples, a dedicated low-activity transfer system from the LAW facility. A small percentage of samples are transported to the laboratory manually in appropriately shielded transportation casks or containers. A more detailed description of the Analytical Laboratory process is found in Chapter 4H.

Response to: Confederated Tribes and Bands of the Yakama Nation

T-1-1

A SEPA checklist was not submitted for this permit modification, portions of the Final Tank Closure and Waste Management Environmental Impact Statement were previously adopted to satisfy the requirements of the State Environmental Policy Act as agreed.

T-1-2

Thank you for your feedback. We are working with the Permittees to ensure that documents are provided for public review in a manner that is easy to review and understand. Due to the size and volume of documents in the WTP Permit, overlapping comment periods may be inevitable from time to time. We will continue to look for opportunities to avoid overlapping comment periods.

T-1-3

WAC 173-303-640(4)(c)(iii) states that secondary containment systems must be: "Provided with a leak-detection system that is designed and operated so that it will detect the failure of either the primary or secondary containment structure or the presence of any release of dangerous waste or accumulated liquid in the secondary containment system within twenty-four hours, or at the earliest practicable time if the owner or operator can demonstrate to the department that existing detection technologies or site conditions will not allow detection of a release within twenty-four hours." Ecology has included permit conditions in the WTP Permit which state, "Detailed plans and descriptions, demonstrating the leak detection system is operated so that it will detect the failure of either the primary or secondary containment structure or the presence of any release of dangerous and/or mixed waste, or accumulated liquid in the secondary containment system within twenty-four (24) hours. Detection of a leak of at least 0.1 gallons per hour within twenty-four (24) hours is defined as being able to detect a leak within twenty-four (24) hours. Any exceptions to this criteria must be approved by Ecology. [WAC 173-303-640(4)(c)(iii), WAC 173-303-806(4)(c)(vii)]." Federal Register, Vol. 51. No. 134, July 14, 1986, in Rules and Regulations, EPA uses 0.1 gallons per hour as an allowable leak rate for tank systems. This Federal Register is the basis for the leak rate criteria that was incorporated into the WTP Permit. This leak

rate is Ecology's standard for determining if the Permittee has met the permit conditions within the WTP Permit and the regulatory requirements as detailed in WAC 173-303-640(4)(c)(iii). The slope of particular items within the facility are evaluated when determining if they meet the required leak detection rate.

T-1-4

Thank you for your comment. Some of the text that was removed in the Permittee's draft permit modification has been added back into Chapter 4H. Ecology agrees that some of the deleted text is necessary and it has been retained in Ecology's draft permit.

T-1-5

The Analytical Lab container storage areas do have a fire sprinkler system, as detailed in Chapter 6A. Section 4H.1.4.6 in Chapter 4H discusses the removal of waste or liquids from secondary containment as required by WAC 173-303-630(7)(a)(ii).

T-1-6

Chapter 4H is a description of the permitted lab areas. Section 4H.3 Air Emission Control, details how air emissions are managed through the ventilation system in the Analytical Laboratory.

Air and water are managed under separate permits and are not part of the scope of this modification. Section X, Other Environmental Permits, of the Part A Form in the WTP Dangerous Waste Permit Application provides a listing of Air and Water permits for the facility. Section 4H of Chapter 4H details that outsource laboratories will be used to analyze the majority of very low-activity samples such as water quality and air emission samples.

T-1-7

Supporting documents such as 24590-LAB-PER-M-02-001, are currently part of the permit and included in the DWP Appendixes (e.g., 11.8). Prior to receipt of waste, once the Permittees and Ecology have certified that construction of the facility is complete, some design documents will be removed from the permit appendices and maintained in the WTP Operating Record in accordance with applicable DWP permit conditions. If a document is revised the Permittees will provide Ecology with a Class 1 or '1 permit modification to update the document within the WTP Permit. These permit modifications are documented through the quarterly modification process.

T-1-8

Newly generated wastes will be managed in accordance with applicable generator requirements as detailed in WAC 173-303-200. The facility's waste tracking system is detailed in Section 4H.1.2.2. Containers managed in this facility will be tracked using the system described.

T-1-9

In the DFLAW configuration the AHL and the hotcell drain collection vessel will not be operational. Transfers from RLD-VSL-00164 are isolated from RLD-VSL-00165; however the vessel is still connected to the vessel vent header for the C5 system in both the baseline and DFLAW configurations.

Details about air emission controls for this facility can be found in Section 4H.3 of Chapter 4H. Some of this detail was incorrectly deleted during the Permittees public comment period, but it has been added back into the Chapter as appropriate.

T-1-10

The previously deleted text in Section 4H.3, Air Emission Control, has been added back into Chapter 4H. Ecology agrees this section contains necessary ventilation information.

T-1-11

Ecology expects the Permittees to manage dangerous waste in accordance with the applicable WAC 173-303 requirements. We have added the necessary Lab Pack citation to Chapter 4H.

T-1-12

Chapter 4H currently details that the Analytical Lab does have satellite accumulation areas and 90-day accumulation areas. This chapter also identifies that the waste in these areas will be managed under WAC-173-303-200. The Permittees will have procedures in place to manage waste and Ecology performs routine inspections of Hanford Site facilities to ensure that waste is being properly managed in accordance with the applicable regulations.

T-1-13

Additional information on management of dangerous and/or mixed waste containers can be found in Chapter 4H, Sections 4H.1, 4H.1.1, 4H.1.2, and 4H.1.2.1.

T-1-14

As detailed in the Introduction to the Part I and Part II Standard and Facility Conditions of the Hanford Site Wide Permit, management of radioactive materials and contamination control are not within the scope of this permit modification. As stated, "Where information regarding treatment, management, and disposal of the radioactive source, byproduct material, special nuclear material (as defined by the Atomic Energy Act of 1954, as amended) and/or the radionuclide component of mixed waste has been incorporated into this permit, it is not incorporated for the purpose of regulating the radiation hazards of such components under the authority of this permit or Chapter 70.105 RCW."

There are procedures in place that detail the steps necessary to check for contamination and any potential decontamination prior to off-site radiological releases, but they are outside of the scope of the RCRA Permit.

T-1-15

Detailed information about this process can be found in Chapter 4G, Direct Feed Low-Activity Waste (Effluent Management Facility). Section 4G.0, Direct Feed Low-Activity Waste (Effluent Management Facility) and Section 4G.2.2, Evaporator Feed Vessel, provide additional details about the process and function of the RLD Vessels.

T-1-16

The Lab will use DOT approved containers for packaging and transportation. Transportation casks are not anticipated to be needed for Lab waste at this time.

T-1-17

Figures 4H-2 and 4H-3 are provided as examples and are not meant to provide detailed drum management. Section 4H.1.2.1 discusses drum configuration and use of secondary containment utilized in the Analytical Lab Waste Management Area. Additional detail about secondary containment can be found throughout Section 4H.1.4.

T-1-18

Please refer to the Part III, Operating Unit Group 10 - Specific Conditions, Waste Treatment and Immobilization Plant Permit Conditions for Facility-Specific Acronyms.

T-1-19

This text will be removed from the document by Ecology when preparing the draft permit for the second public comment period to support this Class 3 Modification.

T-1-20

Deleted text was moved to other specific Sections in Chapter 4H. Section 4H.1.2, Container Management Practices details the anticipated waste types that will be accumulated at the Analytical Lab. This list includes failed small equipment, pumps, air lances, HEPA Filters, etc. Ecology believes the comment request has been fulfilled with the text provided in the draft Chapter.

T-1-21

Waste Management personnel who are responsible for inspecting and accepting containers into the Analytical Lab WMA will be properly trained and familiar with the facility's specific container acceptance protocol. The responsible Waste Management personnel required training will be documented in Chapter 8, Personnel Training. All necessary training requirements will be detailed in Chapter 8.

T-1-22

The deleted text specific to the laboratory information management system (LIMS) was either outdated or captured elsewhere. A description of a LIMS can be found in Section 4H and other important, accurate information about the process to support waste tracking at the Analytical Lab is detailed Section 4H.1.2.2, Waste Tracking.

T-1-23

The text deleted in 4H.1.3 and subsections, is captured within the new text in Section 4H.1.3, and in 4H.1.2.2.

The text deleted in 4H.1.4 and subsections, is captured throughout the new text in Section 4H.1.4.

T-1-24

The structural integrity of the Analytical Lab has been verified by an Independent Qualified Registered Professional Engineer as detailed in the IQRPE Structural Integrity Assessment Reports located in Appendix 11.11 of the current WTP Permit.

T-1-25

The WTP permit is a large, complicated permit. The Permittees and Ecology are making every effort to organize the revisions associated with each permit modification in a reasonable way to ensure that upon completion, the approved permit will support the compliant operation of the Analytical Lab.

T-1-26

Additional details on the secondary containment for the Analytical Lab vessels can be found in Appendix 11.11 of the WTP permit. The specific document that would provide the requested detail is 24590-CM-HC4-HXYG-00240-02-00005, Rev. 00A (IA-3007238-000), IQRPE Structural Integrity Assessment Report for LAB Below Grade Level Secondary Containment.

T-1-27

Inspection requirements for the Laboratory tank systems are addressed in Chapter 6A, Inspection Plan.

T-1-28

Analytical Lab tank system pumps, valves, and instruments are in areas that are accessible to personnel for hands-on maintenance. Analytical Lab vessels and ancillary equipment located in areas that are not routinely accessible are designed to last for the nominal plant life of 40 years. The Analytical Lab tank vessels can be accessed if repair or replacement is required during operations.

T-1-29

Currently there is no anticipated need for the use of tanker trucks to manage discharges from vessel RLD-VSL-00164. Figure 4H-4 is a simplified drawing of the RLD Process Flow and will be modified prior to operations to accurately reflect how the project will manage waste out of the collection vessels.

T-1-30

During operations, wash-downs of the vessels will be scheduled based on the amount of radioactive contamination on the outside of each vessel, on an as-needed basis. Plant operations will determine when and if vessel wash-downs are required.

T-1-31

The details that were deleted about the ASX System in Chapter 4H were either moved to the appropriate section of Chapter 4H or deleted because the details were specific to the ASX System in a facility other than the Analytical Lab.

Ecology chose to retain the text specific to Air Emission Control that was deleted in Section 4H.3.

The details in Section 4H.4, Laboratory Maintenance and Section 4H.5, Solid Waste Management were outside of the scope of the RCRA permit and it was determined that leaving the text in could lead to confusion. How the Analytical Lab manages waste is clearly detailed throughout Chapter 4H.

T-1-32

All of the process flow diagrams for the Analytical Lab can be found in Appendix 11.1 of the WTP Permit. Individually referencing each drawing contained in the appendices would be a time consuming task and potentially lead to inaccurate information being referenced in the permit Tables.

RLD-VSL-00163 collects, contains, and transfers non-contaminated liquid effluents, this vessel is not permitted to manage dangerous dangerous/mixed wastes, therefore it is not regulated under the dangerous waste permit.

Thank you for your comment, however the current figure adequately shows the location of operational units within the TSD facility.

Correct, Figure 4H-2 currently shows an outside door on room A-0139D.

Section 4H.1.4 discusses which containers require the use of secondary containment. Incompatible wastes will be stored on separate portable secondary containment, Section 4H.1.5.

The text adequately describes the locations of the vessels and ancillary equipment. Prior to operations, Ecology will request that the permittees update Figure 4H-4. The simplified drawing is inaccurate as currently depicted.

Correct, the lines identified with a yellow arrow indicate airflow path. Figure 4H-5 is of RLD-VSL-00164 and Figure 4H-6 is of RLD-VSL-00165.

At this time, when in service, liquids from the RLD-00165 tank will only be transferred to the PTF vessel PTF-PWD-VSL-00044.

T-1-33

The ASX is not identified as a critical system in the Dangerous Waste Permit as described in Appendix 2.0. The necessary details that describe how the ASX System works within the Analytical Lab are still detailed in Chapter 4H.

Supplemental information was submitted to Ecology in order to clarify the discrepancy for tank height and shell thickness in response to this comment. Ecology will be making the necessary changes to the files prior to issuance of the draft permit for the second public comment period.

24590-LAB-PER-M-02-001 sections A.8 and B.8 provide the results and conclusions from two different scenarios for each tank. The most conservative value was used as the minimum secondary containment height in Table 4H-4. The installed height of each

sump is greater than the required minimum line height.

Values in Table 4H-5 were updated to be consistent with Table III.10.E.P.

T-1-34

Chapter 6 was not included for public review in this modification. The 5-year recordkeeping requirements stated in Chapter 6A are consistent with WAC 173-303-630(6) requirements for inspection records including repairs and remedial actions taken.

Titles of personnel are not required to be identified in Chapter 6A. A permit condition is not necessary for response times as Chapter 6A specifies that non-emergency corrective actions will be initiated within 24 hours if possible.

T-1-35

A list of facility specific definitions and acronyms is currently detailed in Part III, Operating Unit Group 10 - Specific Conditions, Waste Treatment and Immobilization Plant Permit Conditions.

T-1-36

Ecology agrees, "at least every seven days" is specified to ensure that inspections are performed at least weekly within a seven-day period.

T-1-37

The Analytical Laboratory is included in Section 6A.0, Inspection Plan which addresses the entire WTP Inspection Plan. You will find specific Inspection requirements for the Analytical Lab in Tables 6A-2a and 6A-2b.

T-1-38

Thank you for your suggestion. Section 6A.5.1, Secondary and Miscellaneous Waste in Containers will read as follows: "Container Storage Areas managing secondary and/or miscellaneous wastes are inspected at least every seven days. Inspections of container storage areas include verifying major risk labels are present and legible, that all containers are closed, and area and aisle spacing is free of liquid and debris. Additional inspection criteria are included in the container storage inspection tables at the end of this chapter."

T-1-39

The Lab Dangerous and Mixed Waste Container Storage Area does not have any protective coatings on the floors. This area is not designed as a secondary containment area, all secondary containment will be portable spill containment pallets. See Chapter 4H section 4H.1.4.1.

For signage see Table 6A-1 General Facility Inspections.

The container storage area is maintained under negative pressure.

T-1-40

Thank you for your comment. The nondestructive examination schedule listed is determined by the owner operator, see Appendix 7.15 Operating Documents, 24590-WTP-PER-M-08-001 “Integrity Assessment Program and Schedule for DWP Regulated Equipment in the Analytical Laboratory and Low-Activity Waste Vitrification Facility”.

Footnote #1 is below Table 6A-1, Footnote #2 is associated with RLD-VSL-00165 in Table 6A-2b

The Asterisk is left over from editing and will be removed by Ecology.

Comment noted concerning the exemption of sumps from nondestructive examination. Please see, Appendix 7.15 Operating Documents, 24590-WTP-PER-M-08-001 Integrity Assessment Program and Schedule for DWP Regulated Equipment in the Analytical Laboratory and Low-Activity Waste Vitrification Facility in Appendix 11.18, section 7.1.5 for discussion concerning nondestructive examination of sumps.

For Footnote #4 comment, see section 6A.5.1 Container Inspections The ILAW containers are not associated with the Lab, additional information on management of these containers will be included within the LAW Operating Permit modification.

T-1-41

At this time the frequency and methods of inspections at the Low Activity Waste (LAW) Facility has not yet been determined. This specific detail for the inspections at the LAW Facility will be completed during the LAW Operating Permit modification.

T-1-42

The tables the comment references are not associated with the Analytical Lab. The terminology "example" has been removed from the tables, the specific inspection areas and detail will be populated within the tables when they turn over to operations. The specific information will be provided in Class 3 Modifications to the WTP Facility in the future.

T-1-43

The Dangerous Waste Training Plan will be located in the WTP Operating Record.

T-1-44

Chapter 8.0 includes details about the necessity of Task-Specific Training and references to the applicable portions of Attachment 5. The level of detail in the WTP Training Program is consistent with other Hanford Site Operating Unit Groups.

T-1-45

The WTP Dangerous Waste Training Plan, that is kept in the WTP Operating Record, will provide that level of detail.

T-1-46

Ecology and the permittees will take your suggestion into consideration. Once the Facility Operating procedures are finalized it is anticipated the the details in Table 8-1 and 8-2 will be updated.

T-1-47

The WTP Dangerous Waste Training Plan that is kept in the WTP Operating Record will provide that level of detail.

T-1-48

Ecology agrees that the unit description can be summarized.

The new Unit Description will read:

The Analytical Laboratory is one of the six major facilities within the WTP Operating Unit Group. The Lab will operate to ensure efficient WTP operations by performing analysis of samples to meet permitting, process control, authorization basis, and waste form qualification requirements.

The Lab consists of analytical laboratory rooms, hot cells, and a waste management area for storage of secondary waste generated from analytical activities. The Lab also contains a Radioactive Liquid Waste Disposal (RLD) tank system (tanks and ancillary

equipment) which will be used to store and manage liquid waste generated in the Lab. Under the DFLAW configuration, the liquid waste will be routed to the WTP Effluent Management Facility for treatment. Construction of the Lab was completed in 2014 and operations are expected to begin in 2023.

This Chapter provides unit-specific Permit conditions applicable to the dangerous waste management units for the WTP Lab.

T-1-49

Air emission and water quality samples are generated from operations of all the WTP facilities. Air and water quality samples are outsourced to an environmental laboratory accredited by Washington State Department of Ecology.

T-1-50

This sentence has been deleted from the unit description in the conditions.

T-1-51

This sentence has been deleted from the unit description in the conditions.

T-1-52

The details for closure of the Analytical Lab are described in Chapter 11, Closure Plan, as noted in Permit Condition III.10.L.11. The Closure Plan identifies the steps and procedures necessary to close any WTP permitted DWMU at any point in its active life. This includes the removal of dangerous and/or mixed waste and the decontamination of the permitted DWMU, ancillary equipment, and the associated secondary containment systems.

T-1-53

Chapter 4H contains more detail than the Part A form, which provides a higher level discussion of the nature of business for a unit group. Ecology believes that the level of detail provided in the Part A is adequate and supported by the specific details provided in Chapter 4H.

Revised text for the Unit Description within the WTP specific permit conditions has eliminated the ambiguous wording identified by the comment.

T-1-54

Chapter 4H provides specific Process Information for the Analytical Lab. The Inspection Plan, Chapter 6A, provides specific inspection tables for the Lab and Chapter 8, Training, calls out any special training that would be required by employees that perform work within the Lab. If additional Lab specific requirements become necessary, that detail will be added to the permit as required per WAC 173-303.

T-1-55

Lab critical systems are identified in Appendix 2.0, Critical Systems for WTP. Permit Condition III.10.L.13 was revised to include the following language: "III.10.L.13.a - The RLD is a critical system within the Lab. The RLD in the Lab will comply with III.10.C.9, Critical Systems."

Facility-specific definitions and acronyms are provided in III.10.A, Compliance with Approved Permit.

T-1-56

The waste acceptance described in Chapter 3, and identified in Permit Condition III.10.L.2.a, addresses the entire WTP facility - including the Analytical Lab.

T-1-57

Thank you for your comment. The permit condition has been rewritten to read, "The Permittees are authorized to accept, according to the requirements of Permit Condition III.10.C.2 and Chapter 3, Waste Analysis Plan, dangerous/mixed waste for management in Operating Unit Group 10 dangerous waste management units."

T-1-58

Closure performance standards for the Lab are described in Permit Condition III.10.L.11 and further described in Section 11.2 of the WTP Closure Plan.

T-1-59

The existing permit conditions and text in the chapters specific to the Analytical Lab, adequately detail the regulatory requirements necessary for operations. Text that was deleted about Air Emissions has been retained in Ecology's draft permit.

T-1-60

Permit Condition I.E.2 of the Hanford Site-Wide Permit requires the Permittees comply with all portions of WAC 173-303-810.

T-1-61

Appendix 3B, Quality Assurance Project Plan for the Waste Analysis Plan, of the WTP Permit is compliant with SW-846, as applicable.

T-1-62

The WTP Analytical Laboratory will only be accepting samples from WTP operations and analyzing process samples in support of the Vitrification process. All samples processed at the Analytical Lab will be from a known source.

T-1-63

For baseline configuration 24590-WTP-RPT-MGT-04-001 is still accurate, but does not apply to the Lab. This DQO provides optimized SAP requirements that serve as the standard basis for the regulatory characterization of feed staged for transfer to the WTP.

The list of analytes identified in Chapter 3A is still accurate and applicable to the baseline configuration at this time.

T-1-64

Ecology appreciates and agrees with your suggestion. We have moved two conditions that were under III.10.L.3, Waste Analysis, and placed them in III.10.L.4, Recordkeeping and Reporting. The Permittees are currently developing their operating procedures. Once developed, the operating procedures will be evaluated to determine if any specific permit conditions need to be added for the Analytical Lab prior to receipt of waste.

T-1-65

Permit Condition III.10.L.4.a has been changed to read, "The Permittees will keep and maintain records in the Hanford Facility Operating Record, Analytical Laboratory, as required by WAC 173-303-380, as specified in corresponding chapters and Permit Condition II.I.

T-1-66

The Permittees are currently required to remain in compliance with Permit Conditions I.E.10, Monitoring and Records and the WTP Specific Permit Condition III.10.C.3.d that is referenced in the Analytical Lab specific Permit Condition III.10.L.4.b. Ecology expects the Permittees to follow all documentation of areas of equipment operation requirements in accordance with applicable WAC regulations.

T-1-67

Section 6.4.1 applies to all WTP facilities. Ecology has reviewed the existing text and believes that it adequately addresses the unloading/loading operations that could be encountered at the Lab. When the Analytical Lab operating procedures are completed, they will be evaluated to determine if additional Lab specific conditions need to be added to the permit prior to receipt of waste at the facility.

T-1-68

Thank you for your comment. Text was revised to remove reference of Permit Condition II.I.2, as it was an error. Please see revised text. Ecology has reviewed all references to Part I and Part II Permit Conditions and corrected references where necessary.

T-1-69

Chapter 11, Closure Plan was submitted, by the permittees for public review, with a Class 3 Modification to support EMF Secondary Containment. After the two public comment periods the Class 3 Modification was approved by Ecology in Letter 17-NWP-103, dated September 5, 2017. There were no revisions made to Chapter 11, Closure Plan to support the current Class 3 Modification for the Analytical Lab, therefore Chapter 11 did not go out for public comment a third time. Ecology is reviewing the documents supplied by the permittees to ensure they are adequately complying with the regulations.

T-1-70

Chapter 4H provides specific Process Information for the Analytical Lab. The Inspection Plan, Chapter 6A, provides specific inspection tables for the Lab and Chapter 8, Personnel Training, calls out any special training that would be required by employees that perform work within the Lab. If additional Lab specific requirements become necessary, that detail will be added to the permit as required per WAC 173-303. As the permit is being restructured from a design/construct permit to an operating permit Ecology is aware that there are some locations within the permit where text will be repetitive, we are making every effort to avoid duplication where possible and still ensure the permit addresses all necessary regulatory requirements.

T-1-71

We apologize for the confusion that may arise between use of addendum vs. chapters. There has been some overlap in text changes between the active Revision 8C Hanford Site Wide Permit and the Rev 9 Draft Renewal of the Hanford Site Wide Permit. Ecology is making every effort to organize the revisions associated with each permit modification in a reasonable way to ensure that upon completion, the approved permit will support the compliant operation of each facility. Ecology will work with the

Permittees to address these editorial changes as they present themselves.

T-1-72

The revised text for Section 6A.5.1, will read as follows: "Container Storage Areas managing secondary and/or miscellaneous wastes are inspected at least every seven days. Inspections of container storage areas include verifying major risk labels are present and legible, that all containers are closed, and areas and isle spacing is free of liquid and debris. Additional inspection criteria are included in the container storage inspection tables at the end of this chapter."

Table 6A-2a, Lab Container Storage Inspections also details the required inspections for these container storage areas.

The exterior walls of the WMA are constructed of reinforced concrete and the entire floor area is coated with a special protective coating. Coatings are provided to support the clean-up and decontamination of potential spill and are not designed to provide secondary containment.

T-1-73

All referenced Permit Conditions are accessible to the public through the Ecology website. Because this was a Permittee lead public review, only the Analytical Laboratory Specific Operating Conditions, III.10.L, were provided for public comment. When Ecology writes the Draft Permit, the Analytical Laboratory Specific Operating Conditions will be incorporated into the Unit Specific Conditions, Part III, Operating Unit Group 10, and again be available for public review.

All Chapters of the WTP Permit that have been revised to support the Class 3 Modification for the Analytical Lab will be available for review and comment during Ecology's public comment period.

T-1-74

Thank you for your comment and suggested edits. Ecology has made edits and revisions to the draft permit conditions which were reviewed by the public during the first public comment period for the Class 3 Modification to support the Analytical Lab. We have not incorporated every comment that was provided but believe the necessary revisions have been made to ensure the draft permit conditions are correct and ensure the Permittees remain compliant with the regulations as the transition to operations in the Analytical Lab.

APPENDIX A: COPIES OF ALL PUBLIC NOTICES

Public notices for this comment period:

1. Public notice (Fact sheet)
2. Classified advertisement in the *Tri-City Herald*
3. Notices sent to the Hanford-Info email list

WTP Permit Change Proposed for Analytical Laboratory Operations

The U.S. Department of Energy (DOE) Office of River Protection (ORP) and Bechtel National, Inc. (BNI) are holding a 60-day public comment period on a proposed modification to the Hanford Waste Treatment and Immobilization Plant (WTP) Dangerous Waste Permit. This proposed permit change provides the operating permit information and draft conditions to support WTP Analytical Laboratory (Lab) Operations.

July 2017

U.S. Department of Energy – Office of River Protection

Background

The Hanford Site is located in southeastern Washington State along the Columbia River. The 580 square-mile site was created in 1943 as part of the Manhattan Project to produce plutonium for the nation's defense program. Hanford's legacy defense waste is stored in 177 underground tanks containing approximately 56 million gallons of high-level radioactive and dangerous waste. Most of the tanks are beyond their engineered design life, and some have leaked in the past.

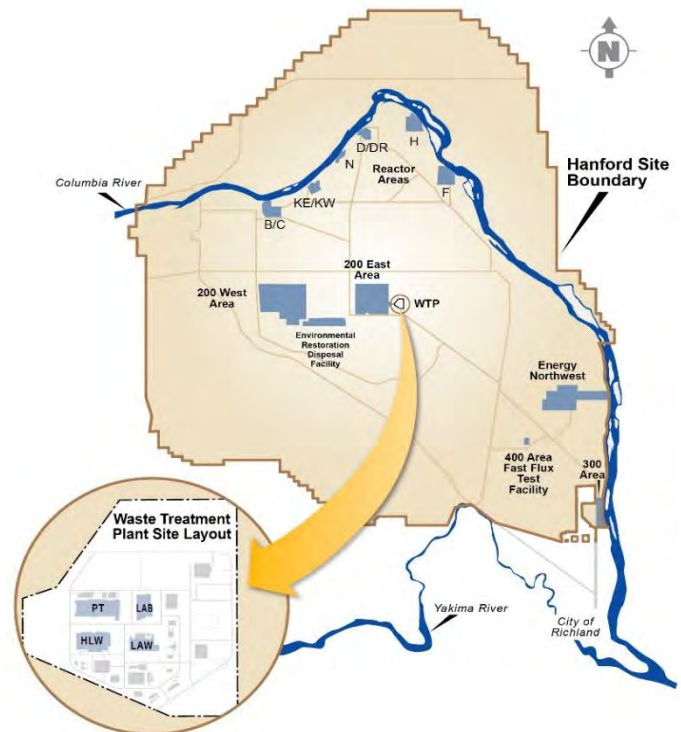
Waste Treatment Plant

The Waste Treatment and Immobilization Plant (WTP) is located on approximately 65 acres in the center of the Hanford Site. In the Direct Feed Low-Activity Waste (DFLAW) configuration, WTP will receive pretreated tank waste from the Low-Activity Waste Pretreatment System (LAWPS), that will be immobilized (formed into glass) in the Low-Activity Waste (LAW) Facility.

The Washington State Department of Ecology (Ecology), ORP, and BNI have used a phased approach to permit the WTP since September 2002. As Permittees, ORP and BNI have submitted technical documents and design information on a schedule to allow for construction of the rest of WTP and to complete the permit application. The Lab is the first WTP facility to reach the final phase of WTP permitting. In this phase, the Permittees are submitting the outstanding operational details and proposed permit conditions as a Class 3 permit modification.

Analytical Laboratory Operations

This permit modification provides operating details for the Lab under the DFLAW configuration. Two types of waste management units (container storage area and tank systems) are located in the Lab. Secondary containment is provided as required for tank systems managing dangerous or mixed waste.



Public Comment Period

We welcome your feedback on this proposed modification. The public comment period is scheduled to run from **July 3, 2017 through September 1, 2017.**

A public meeting is scheduled for **Thursday, August 3, 2017 at 5:30 p.m.**, at the Richland Public Library, 955 Northgate Drive, Richland, WA. The meeting will also be accessible via webinar. To register, go to <https://attendee.gotowebinar.com/register/7109688858667678722> (Webinar ID: 407-533-971).

Ecology and the Permittees participated in a series of facilitated workshops to determine the design and scope of an integrated operating permit. The result of these workshops was the development of Lab Operating Permit Conditions Section III.10.L, which is proposed in this Class 3 Modification for addition to the existing WTP Dangerous Waste Permit (DWP). The current WTP DWP contains design information (i.e., technical specifications in the WTP DWP appendices) related to construction of the Lab. The design information in the WTP Permit is being replaced by the operating information provided with this modification. As Ecology reviews this modification for completeness, they will determine what existing Lab design information should be removed from the permit. The design information that is removed from the permit will be maintained in the unit-specific operating record.

Permit Modification Scope

The Permittees are seeking approval from Ecology to incorporate the outstanding operational information for the Lab in the DFLAW configuration.

Documents Included with Modification

This modification is being submitted as a Class 3 modification in accordance with WAC 173-303-830(4)(c)(i-v). A summary of the documents provided with this modification include:

Permit Chapters

- [Chapter 4H](#), Analytical Laboratory
- [Chapter 6A](#), Inspection Plan
- [Chapter 8](#), Personnel Training

These chapters were revised to incorporate operating requirements for the Lab. The listed permit chapters above were among the permit chapters that were modified with the EMF Secondary Containment Permit Modification (24590-BOF-PCN-ENV-15-002). The second public comment period for 24590-BOF-PCN-ENV-15-002 started on May 22, 2017, and is scheduled to end on July 7, 2017. The concurrent public comment periods have resulted in some overlap of changes in these three chapters. To address the parallel reviews of the permit chapters, the Permittees have shaded (in gray) all of the changes that are proposed for the EMF Secondary Containment Permit (May 22 thru July 7). Changes affecting the Lab Operating Permit are denoted in redline/strikeout. Comments for this public comment period should be on the redline/strikeout portion.

Comment Submission

A 60-day public comment period is scheduled to begin **July 3** and continue through **September 1, 2017**. We welcome your input by mail or email (preferred) by **September 1**, to:



Dan McDonald
Washington State Department of Ecology
3100 Port of Benton Boulevard
Richland, WA 99354
Email: <http://wt.ecology.commentinput.com/?id=KukbP>
Phone: (509) 372-7950

A public meeting is scheduled for **August 3, 2017, at 5:30 PM** at the Richland Public Library, 955 Northgate Drive. The meeting will also be accessible via webinar. To register, go to <https://attendee.gotowebinar.com/register/7109688858667678722> (Webinar ID: 407-533-971).

Other Supporting Information:

- Permit Conditions Section III.10.L are being proposed for addition into the permit to reflect Lab Operating Permit requirements. These conditions were prepared in coordination with Ecology and are being provided to the public for review to support the first part of the Class 3 Permit Modification. Input received during the first public comment period will help Ecology as they draft, and eventually finalize, the permit conditions to support the second public comment period for this Class 3 Permit Modification.
- Updated Permit Condition Tables are provided for Table III.10.E. D and III.10.E.P to reflect the current operations information for the Lab. The information in these tables is also provided in Chapter 4H of this permit modification.

Public Review Process

A 60-day public comment period is scheduled for **July 3, 2017** through **September 1, 2017**. A public meeting is scheduled for **August 3, 2017** at the Richland Public Library (955 Northgate Drive). The meeting will also be accessible via webinar. To register, go to <https://attendee.gotowebinar.com/register/7109688858667678722> (Webinar ID: 407-533-971).

At the conclusion of the 60-day public comment period, Ecology will perform a completeness determination and technical review and technical as detailed in WAC 173-303-840 and address public comments received by preparing a response-to-comments document.

Copies of the proposed modification and supporting documentation will be available during the public comment period online at <http://www.hanford.gov/pageAction.cfm/calendar?&IndEventID=8177> or <http://www.ecy.wa.gov/programs/nwp/commentperiods.htm>. Copies may also be viewed at the Hanford Public Information Repository locations listed below.

Contact Information

Submit written comments on the proposed WTP Permit modification by **September 1, 2017** to Dan McDonald, Ecology, at <http://wt.ecology.commentinput.com/?id=KukbP>. For additional information, contact Dieter Bohrmann, ORP, at [Dieter G Bohrmann@orp.doe.gov](mailto:Dieter_G_Bohrmann@orp.doe.gov).

Hanford Public Information Repositories

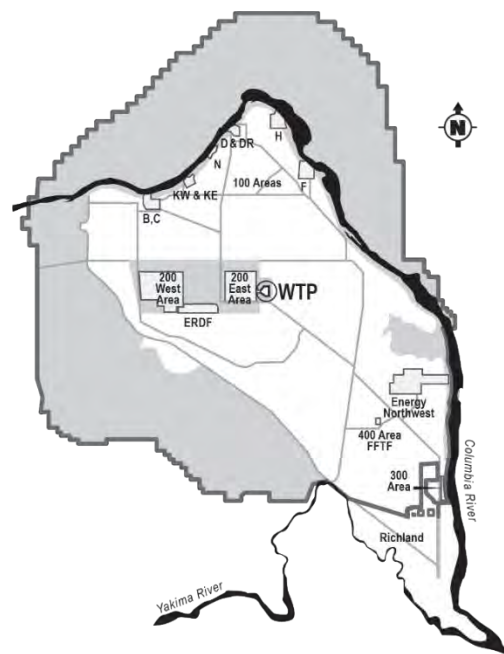
<p>Portland State University Government Information Branford Price Millar Library 1875 SW Park Ave Portland, OR 97207-1151 Attn: Bertrand Robinson (503) 725-4128 Email: brobins@pdx.edu</p> <p>Map: www.pdx.edu/map.html</p>	<p>University of Washington Suzzallo Library Government Publications Department Box 352900 Seattle, WA 98195-2900 Attn: Hilary Reinert (206) 685-3130 Email: cass@uw.edu; reinerth@uw.edu</p> <p>Map: www.tinyurl.com/m8ebj</p>	<p>U.S. Department of Energy Public Reading Room Wash State University Tri-Cities Consolidated Information Ctr, Rm 101-L 2770 University Drive Richland, WA 99352 Attn: Janice Scarano (509) 372-7443 Email: doe.reading.room@pnnl.gov</p> <p>Map: www.tricity.wsu.edu/campusmapaps/campusmap.pdf</p>	<p>Gonzaga University Foley Center Library 502 E. Boone Ave Spokane, WA 99258 Attn: John Spencer (509) 313-6110 Email: spencer@gonzaga.edu</p> <p>Map: www.tinyurl.com/2c6bpm</p>	<p>Ecology Nuclear Waste Program Resource Ctr 3100 Port of Benton Blvd Richland, WA 99354 Attn: Teresa Booth (509) 372-7950 Email: Hanford@ecy.wa.gov</p> <p>Online: http://www.ecy.wa.gov/programs/nwp/commentperiods.htm</p>
<p>Administrative Record and Public Information Repository Address: 2440 Stevens Center Pl, Rm 1101, Richland, WA 99352 Attn: Heather Childers Phone: (509) 376-2530 Email: heather_m_childers@rl.gov Website: www2.hanford.gov/arpir/</p>				

The Permittees' compliance history during the life of the WTP Permit being modified is available from the Washington State Department of Ecology. Contact Dan McDonald at Hanford@ecy.wa.gov.

Hanford Public Involvement Opportunity

We want to hear from you on the proposed modifications for the Hanford Waste Treatment and Immobilization Plant's Dangerous Waste Permit!

Comment Period: July 3, 2017 through September 1, 2017
Public Meeting: 5:30 p.m. August 3, 2017 – Richland Public Library



Class 3 Permit Modification Fact Sheet
U.S. Department of Energy
Office of River Protection
P.O. Box 450, H4-02/MS14-2A
Richland, WA 99352

OFFICE OF RIVER PROTECTION
United States Department of Energy



red line' dissenters

ndover, China prom- rant Hong Kong a ree of autonomy for 0 years, but Xi said portant to have a understanding" of ionship between ntry and two sys-

country is like the a tree," he told ng's elite after g in a new chief e to govern the Carrie Lam. "For a row and flourish, its ust run deep and he concept of e two systems was d first and foremost e and uphold na- vereignty." people in Hong used China of the territory's au- in 2015 by seizing ishers who were ut gossipy books

about the Chinese lead- ership and allegedly dis- tributing them on the main- land.

Some are also angry that Beijing intervened to dis- qualify newly elected pro- independence lawmakers who failed to correctly ad- minister the oath of office last year. Many people are worried about a steady ero- sion of press freedom, and that in a range of areas Chi- na is increasingly deter- mined to call the shots.

But Xi made it clear that challenges to Beijing's au- thority would not be al- lowed.

"Any attempt to endanger China's sovereignty and security, challenge the pow- er of the central government and the authority of the Basic Law of the Hong Kong Special Administrative Re- gion, or use Hong Kong for infiltration or sabotage ac- tivities against the main- land, is an act that crosses the red line and is absolutely impermissible," he said.

open July 4th
7:30am-2:00pm

1721 Dietrich Rd, Pasco

Hanford Public Comment Opportunity: Permit Change Proposed to Support WTP Analytical Laboratory Operations

The U.S. Department of Energy, Office of River Protection (DOE-ORP) and Bechtel National, Inc. (BNI) invite you to review and comment on a proposed Class 3 modification to the Hanford Waste Treatment and Immobilization Plant (WTP) Dangerous Waste Permit. This modification provides the operating permit information and draft conditions to support WTP Analytical Laboratory operations.

A 60-day public comment period will run from July 3, 2017 through Sept. 1, 2017.

We welcome your comments on these proposed changes. Please submit comments by **Sept. 1, 2017**, in writing, by mail, email, or through Ecology's new eComment weblink (preferred) to:

Dan McDonald
Washington State Department of Ecology
3100 Port of Benton Boulevard
Richland, WA 99354

Email: Hanford@ecy.wa.gov

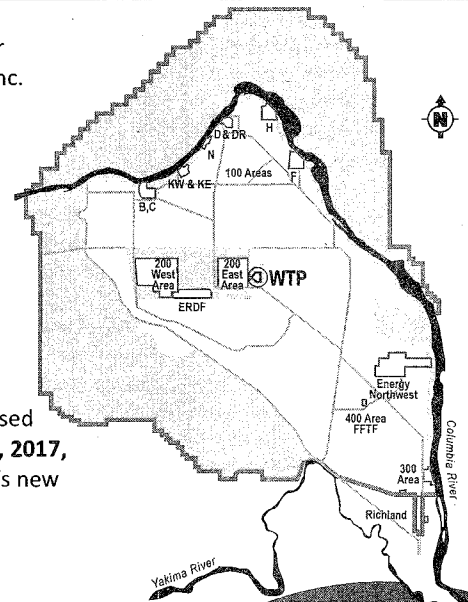
eComment:

<http://wt.ecology.commentinput.com/?id=KukbP>

The DOE-ORP contact person for this permit modification is Dieter Bohrmann, (509) 376-9292. The Ecology contact person is Dan McDonald, (509) 372-7950.

Copies of the proposed permit modification request and supporting documentation are available at the Hanford Administrative Record, 2440 Stevens Drive, Richland, WA

The Permittees' compliance history during the life of the permit being modified is available from Ecology. Contact Dan McDonald at Hanford@ecy.wa.gov.



You are invited to attend a public meeting to discuss the proposed permit modification and provide comments.

The meeting is scheduled for:

August 3, 2017

5:30 p.m.

Richland Public Library
955 Northgate Drive
Richland, WA 99352



OFFICE OF
RIVER PROTECTION
United States Department of Energy

Please Join Us!

WEDNESDAY, JULY 15, 2017 • 7:00pm
HOTEL COURTYARD, RICHLAND

for the **ANGELS**

THE SILVER SCREEN

Benefit for Chinatown Hospice Care

chocolates, and a performance of the movies of the 20th Century

with **CATHY KEELY**
DIMPSON, LYAL, BRONKHORST
DITMAN

Presented by

EverStar

\$55 PER PERSON available at
cyhealthcare.org/event/angels

McFadden, Daina (ECY)

From: ^TPA <TPA@RL.GOV>
Sent: Monday, May 22, 2017 3:58 PM
To: HANFORD-INFO@LISTSERV.WA.GOV
Subject: Notice of upcoming comment period for WTP permit

This is a message from the U.S. Department of Energy

Notice of Public Comment Period on Proposed Changes to the Hanford WTP Dangerous Waste Permit

The U.S. Department of Energy Office of River Protection (ORP) and Bechtel National, Inc. (BNI) are planning a 60-day public comment period to support a requested Class 3 permit modification to the Hanford Waste Treatment and Immobilization Plant (WTP) Dangerous Waste Permit. This modification provides WTP Analytical Laboratory operating information and proposed operating conditions to the Washington Department of Ecology (Ecology) for addition into the existing permit.

The comment period is expected to begin in July, with a public meeting in August.

Copies of the proposed modification and supporting documentation will be available during the public comment period at the Hanford Administrative Record Public Information Repository located at 2440 Stevens Drive, Richland, WA, and online at <http://pdw.hanford.gov/arpir/>.

Additional information on the proposed permit modification will be available on Ecology's [website](#), the Hanford [Public Information Repositories](#), and other document review locations when the public comment period begins.

Questions? Please contact Dieter Bohrmann, ORP, at [Dieter G Bohrmann@orp.doe.gov](mailto:Dieter_G_Bohrmann@orp.doe.gov), or Randy Bradbury, Ecology, at Hanford@ecy.wa.gov.



Visit us on the [web](#) or [social media](#).

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From: ^TPA
To: HANFORD-INFO@LISTSERV.WA.GOV
Subject: Public comment period for Hanford WTP Analytical Lab Operating Permit
Date: Monday, July 3, 2017 11:01:43 AM
Attachments: [WTP Analytical Lab Fact Sheet.pdf](#)

Public Comment Period on Proposed Changes to the Hanford WTP Dangerous Waste Permit

The U.S. Department of Energy Office of River Protection (ORP) and Bechtel National, Inc. are holding a 60-day public comment period on a proposed modification to the Hanford Waste Treatment and Immobilization Plant (WTP) Dangerous Waste Permit. This proposed permit change provides the operating permit information and draft conditions to support WTP Analytical Laboratory Operations.

The public comment period runs from **July 3 through September 1, 2017, with a public meeting scheduled for August 3 at 5:30 p.m. at the Richland Public Library** (955 Northgate Drive). The meeting will also be accessible via webinar. To register, go to <https://attendee.gotowebinar.com/register/7109688858667678722> (Webinar ID: 407-533-971).

Submit comments on the proposed WTP Permit modification by September 1, 2017:

Electronically (preferred) to: <http://wt.ecology.commentinput.com/?id=KukbP>

Or by mail to:

Dan McDonald
Washington Department of Ecology
3100 Port of Benton Boulevard
Richland, WA 99354

The proposed modification and supporting documentation are available for review online at <http://pdw.hanford.gov/arpir/index.cfm/viewDoc?accession=0069383H>, on Ecology's [website](#), and at [Hanford Administrative Record and Public Information Repositories](#) located in Richland, Seattle, Spokane and Portland. Copies can also be reviewed in person at the Hanford Administrative Record Public Information Repository at 2440 Stevens Drive in Richland.

For more information, please see the attached fact sheet or contact Dieter Bohrmann, ORP, at Dieter_G_Bohrmann@orp.doe.gov, or Dan McDonald, Ecology, at dmcd461@ecy.wa.gov.



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