

Hanford Emergency Management Plan and Building Emergency Plan permit modification



Public comment period

February 10 through March 25, 2020

Please submit comments

Electronically (preferred) via:

<http://wt.ecology.commentinput.com/?id=p9NmW>

By U.S. Mail, or hand-delivery:

Daina McFadden
3100 Port of Benton Blvd
Richland WA 99354

Public hearing

A public hearing is not scheduled, but if there is enough interest, we will consider holding one. To request a hearing or for more information, contact:

Daina McFadden
509-372-7950
Hanford@ecy.wa.gov

Special accommodations

To request ADA accommodation including materials in a format for the visually impaired, call Ecology at 360-407-6831 or visit <https://ecology.wa.gov/accessibility>.

People with impaired hearing may call Washington Relay Service at 711. People with speech disability may call TTY at 877-833-6341.

Public comment invited

The Washington State Department of Ecology (Ecology) invites public comment a proposed modification to the *Hanford Facility Resource Conservation and Recovery Act Permit for the Treatment, Storage, and Disposal of Dangerous Waste, Revision 8c* (Permit).

The changes affect the Hanford Emergency Management Plan, associated facility-specific Building Emergency Plans, and other associated permit files for operating and closing units in the Permit.

Ecology invites you to comment on this new modification February 10 through March 25, 2020.

The Permittees are:

U.S. Department of Energy
Office of River Protection
P.O. Box 450
Richland, WA 99352

Bechtel National, Inc.
2435 Steven's Center Place
Richland, WA 99354

Washington River Protection
Services LLC
P.O. Box 850
Richland, WA 99352

CH2M Hill Plateau Remediation
Company
P.O. Box 1600
Richland, WA 99352

U.S. Department of Energy
Richland Operations
P.O. Box 550
Richland, WA 99352

Mission Support Alliance
P.O. Box 650
Richland, WA 99352

Pacific Northwest National
Laboratory
P.O. Box 999
Richland, WA 99352

Background

On September 5, 2014, the United States Department of Energy (USDOE) initiated a Class 2 modification to revise the Contingency Plan requirements in the Permit (Letter 14-ESQ-0111).

The Class 2 modification was submitted as required by Agreed Order and Stipulated Penalty, Docket No. DE 10156, Hanford Solid Waste Operations Complex (Agreed Order). Exhibit A, Section 1.1.2 of the Agreed Order states:

“By January 30, 2015, USDOE will submit to Ecology a Class 2 permit modification request. The permit modification request will include two changes. One change will be to the Permit Applicability Matrix (Permit Attachment 9) to make ‘Facility Contingency Plan’ applicable to Interim Status TSD Units (the SWOC units are operating to Interim Status Standards). The second change will be to Appendix A of DOE/RL-94-02, Hanford Emergency Management Plan (Permit Attachment 4), to describe how each requirement of WACs 173-303-340, -350, -355, and -360 are met for TSD units operating to Interim Status Standards.”

At the conclusion of the 2014 public comment period for the Class 2 modification, Ecology determined that additional changes needed to be made to the attachments, the associated Hanford site contingency planning documents, and the Part I and II Permit Conditions. Ecology issued Letter 14-NWP-244, dated December 12, 2014, notifying the Permittees that we would reclassify the permit modification to a Class 3 permit modification.

Overview of the Proposed Changes

Since 2014, Ecology and the Permittees have worked collaboratively to perform a comprehensive evaluation and review of the Hanford contingency planning documentation. The comprehensive evaluation led to the proposed modifications of the existing permitted documents and creation of new documents to ensure that the Permittees are in compliance with the contingency plan and emergency requirements detailed in WAC 173-303-340, -350, -355, and -360.

Ecology and the Permittees agreed to modify the unit group specific Building Emergency Plans (BEPs) or Facility Response Plans (FRPs) (whichever document is appropriate), to include the details required in WAC 173-303-350. Based on these discussions, the Permittees submitted updated BEPs and an FRP to Ecology to be included as part of this permit modification to replace the existing Contingency Plans. The BEPs and an FRP, in combination with the Hanford Emergency Management Plan (Permit Attachment 4), will serve as the Contingency Plan.

This permit modification includes the following documents for public comment.

- Revised Part I and II Permit Conditions
- Changes to the Hanford Emergency Management Plan (DOE/RL-94-02, Rev 7 Draft)
- New Attachment 4A to the Hanford Site Wide Permit (Qualified Building Emergency Directors and Building Wardens)
- Updates to Attachment 9 – Applicability Matrix
- New Building Emergency Plans (BEP) and Facility Emergency Plan (FRP) for the following facilities:
 - Liquid Effluent Retention Facility and 200 Area Treatment Facility
 - 242-A Evaporator
 - 325 Hazardous Waste Treatment Units
 - 400 Area Waste Management Unit
 - PUREX Storage Tunnels

The Building Emergency Plan for the Waste Treatment Plant (WTP) is not included in this public comment period because it was previously submitted for public comment during the WTP Low-Activity Waste and Effluent Management Facilities Class 3 Public comment period that ran from July 1 to August 30, 2019.

The Building Emergency Plan for the Integrated Disposal Facility (IDF) is not included in this public comment period because it is currently out for public comment to support the IDF Operations Class 3 Permit Modification, which is open for public comment December 16, 2019, through February 14, 2020.

Why it matters

A robust and compliant Contingency Plan ensures that the Hanford Facility operates in a way that protects human health and the environment. The modifications were made to:

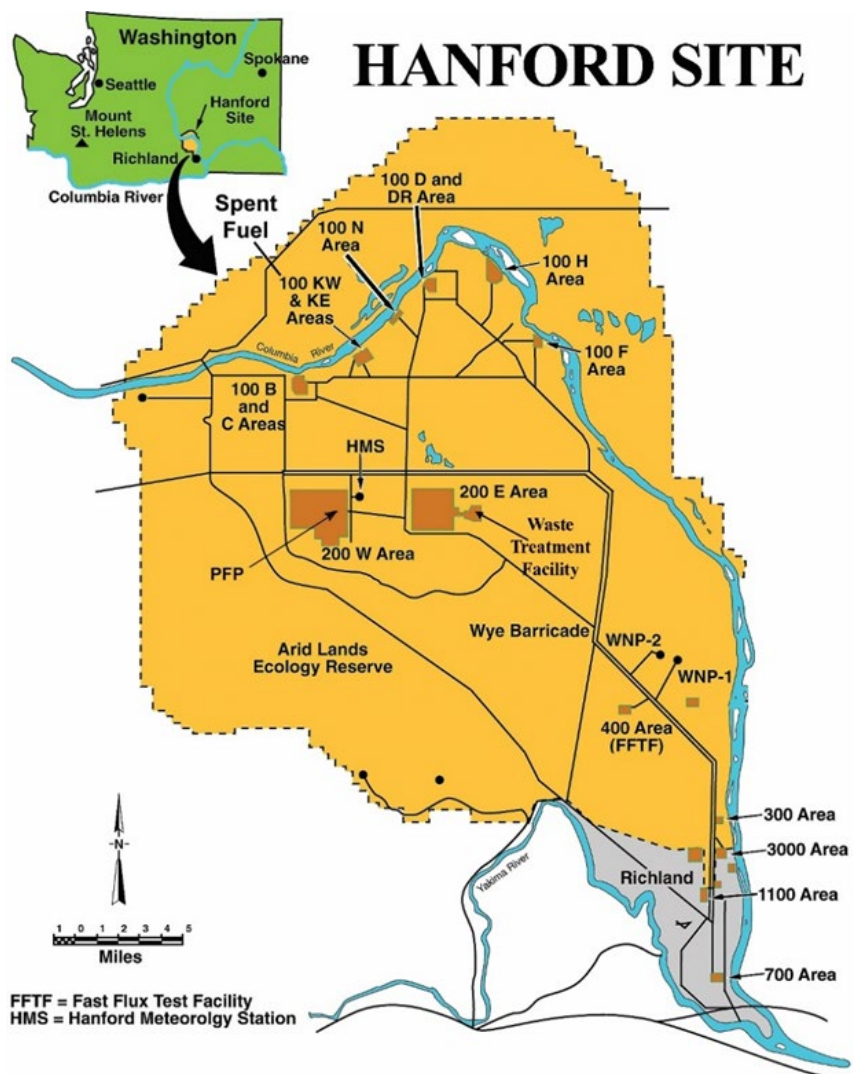
- Ensure consistency among the unit-specific Building Emergency Plans.
- Improve criteria for implementation of contingency plans.
- Ensure that all applicable regulatory requirements are correctly outlined and referenced in Appendix A of the Hanford Site Wide Permit.

Reviewing the proposed changes

Ecology invites you to review and comment on this proposed permit modification for the Hanford Emergency Management Plan and associated Building Emergency Plans. See page 1 for comment period dates and information on how to submit comments.

Copies of the application for the proposed permit and supporting documentation will be available during the public comment period online at Ecology's website at <https://www.ecology.wa.gov/Waste-Toxics/Nuclear-waste/Public-comment-periods>. The documents will also be available at the Hanford Public Information Repositories listed on the last page.

Ecology will consider and respond to all significant comments received during the public comment period. We will document our responses and issue a response to comments document when we make our final permitting decision.





DEPARTMENT OF
ECOLOGY
State of Washington

Nuclear Waste Program
3100 Port of Benton Blvd
Richland, WA 99354

Hanford's Information Repositories and Document Review Locations

Washington

Richland

Ecology Nuclear Waste Program
Resource Center
3100 Port of Benton Blvd.
Richland, WA 99354
509-372-7950

U.S. Department of Energy
Administrative Record
2440 Stevens Drive, Room 1101
Richland, WA 99354
509-376-2530

Washington State University Tri-Cities
Department of Energy Reading Room
2770 Crimson Way, Room 101L
Richland, WA 99354
509-375-7443

Seattle

University of Washington
Suzzallo Library
P.O. Box 352900
Seattle, WA 98195
206-543-5597

Spokane

Gonzaga University
Foley Center
502 E Boone Avenue
Spokane, WA 99258
509-313-6110

Oregon

Portland

Portland State University
Millar Library
1875 SW Park Avenue
Portland, OR 97207
503-725-4542