

Hanford Site Comments on the Proposed Class 3 Permit Modification 8C.2020.4D to the Hanford Facility Resource Conservation and Recovery Act Permit, Dangerous Waste Portion, Revision 8C, for the Treatment, Storage, and Disposal of Dangerous Waste, Part III, Operating Unit Group 3, Liquid Effluent Retention Facility (LERF) and 200 Area Effluent Treatment Facility (ETF), WA7890008967

Item	Comment
1.	Fact Sheet, pg. 4, Section 1.0: “Upon approval and issuance of this permit modification the LERF and 200 Area ETF will be authorized to ..., operate the Load-In Station filter drain sump tank 59A-TK-2, ...” The current LERF and 200 Area Permit, Section C.4.3.1.2, <i>Load-In Station Tank Secondary Containment</i> describes the filter system, which describes the existing filter drain sump tank 59A-TK-2 as ancillary equipment. This permit modification is only reclassifying the filter drain sump tank 59A-TK-2 as a tank. As such, the permit already authorizes operation of the Load-In Station filter drain sump tank 59A-TK-2.
2.	Fact Sheet, pg 6, Section 4.0: “incorporates an existing Filter Drain Sump Tank (59A-TK-2) into the permit” and “...authorize...operate the Load-In Station filter drain sump tank 59A-TK-2...” The current LERF and 200 Area Permit, Section C.4.3.1.2, <i>Load-In Station Tank Secondary Containment</i> describes the filter system, which describes the existing filter drain sump tank 59A-TK-2 as ancillary equipment. This permit modification is only reclassifying the filter drain sump tank 59A-TK-2 as a tank. As such, the permit already authorizes operation of the Load-In Station filter drain sump tank 59A-TK-2.
3.	Permit Condition III.3.J.2.a, pg. Conditions.7: Correct LERF Catch Basin nomenclature, change “242-AL” to “242AL-42”.
4.	Permit Condition III.3.J.2.b, pg. Conditions.7: Correct LERF Catch Basin nomenclature, change “242-AL” to “242AL-42”.
5.	Permit Condition III.3.J.2.c, pg. Conditions.7: Correct LERF Catch Basin nomenclature, change “242-AL” to “242AL-42”.
6.	Permit Condition III.3.J.3, pg. Conditions.7, pg. Conditions.7: Correct LERF Catch Basin nomenclature, change “242-AL” to “242AL-42”.
7.	Permit Condition III.3.J.4, pg. Conditions.7: Correct LERF Catch Basin nomenclature, change “242-AL” to “242AL-42”.
8.	Permit Condition III.3.J.10, pg. Conditions.8: Recommend deleting this permit condition; the Permittees completed this action with the submittal of DOE letter 19-ECD-0083, “Submittal of the Integrated Disposal Facility Modeling Risk Budget Tool Permit Condition III.11.I.5 Operating Unit Group 11”, to Ecology on January 7, 2019.
9.	Permit Condition III.3.J.12, pg. Conditions.8, lines 20-21: Revise permit condition to read, “The waste collected by the brine loadout system must meet land disposal restriction requirements as specified in Permit Condition II.S and the Hanford Federal Facility Agreement and Consent Order when treated for disposal”
10.	Addendum C, Section C.1, lines 6 and 8: Correct LERF Catch Basin nomenclature, change “242-AL-42” to “242AL-42”
11.	Addendum C, pg. C.20, line 38: Change “260 to 330 gallons” to “260 to 350 gallons”.
12.	Addendum C, pg. C.27, line 24: Description should address floor slope in accordance with WAC 173-303-640(4)(b)(iv). After “building 2025ED.” add, “The 2025ED Load-In Station is sloped to drain to the Load-In Station tank secondary containment pit.”
13.	Addendum C, pg C.50, line 36. Change “form” to “from”.
14.	Addendum C, pg. C.62, Table C-7: Filter drain sump tanks 59A-TK-2/59A-TK-3, Connection column, change “Flanged” to Welded”.

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15.	Addendum I, pg. I.6, line 23: Delete “solidified” because the sentence describes secondary waste to include “liquid from the brine loadout system”.
16.	Addendum I, pg. I.6, line 32: Delete “Following the inspections, an inspection datasheet is signed and dated by the inspector and supervisor.” This information is addressed in Section I.1.3, Inspection Log. The use of the term “inspection datasheet” is not consistent with Section I.1.3, pg. I.9, lines 23-27.