



RCRA and permitting at Hanford

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Washington State's Authority to Regulate Dangerous Waste at Hanford

- The U.S. Environmental Protection Agency (EPA) may authorize states to administer and enforce a state hazardous waste management program
 - EPA has an office in Seattle, Washington that is responsible for Resource, Conservation, and Recovery Act (RCRA) issues.
 - EPA also has a Hanford Site office on Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) issues through the Tri-Party Agreement.
- The state's authority is equivalent to the federal program.
- Ecology works closely with EPA on regulatory issues and decisions. EPA maintains an oversight role of their delegation of RCRA to the state.



What does Ecology regulate?

- Ecology regulates dangerous waste and dangerous components of mixed waste under:
 - Dangerous waste regulations (Washington Administrative Code 173-303)
 - State Hazardous Waste Management Act
- The Hanford Sitewide Permit has requirements for the treatment, storage and disposal of dangerous and mixed waste at Hanford.
- Ecology's responsibility is the protection of human health and the environment.
- What isn't under Ecology's authority?
 - Waste that is solely radioactive is managed exclusively by the U.S. Department of Energy (USDOE).
 - Radioactive materials
 - Radioactive waste



Other State Permits

- Air Operating Permit (Hanford)
- Water Permits (Hanford)
- Perma-Fix Northwest (Non-Hanford)
- Puget Sound Naval Shipyard (Non-Hanford)

Tri-Party Agreement

- Ecology, EPA, and Energy signed the legally binding Tri-Party Agreement and Consent Order.
 - Milestones were developed to support RCRA and CERCLA cleanup.
 - The Hanford Sitewide Permit application material was originally submitted through Tri-Party Agreement milestones.
 - Not all the facilities and dangerous waste management units* were included in the first Hanford Sitewide Permit.
 - Unit groups* within the permit are also listed in Appendix B of the Tri-Party Agreement.

Hanford Sitewide Permit History



- The Hanford Sitewide Permit was first issued in 1994.
 - Currently, the permittees are operating under the Hanford Sitewide Permit, Revision 8C.
 - Includes “22” unit groups.
 - Separated into Permit Conditions and Attachments, Operating Unit Groups, Corrective Action Unit Groups, Closing Unit Groups, and Post-Closure Unit Groups.
 - Hanford Sitewide Permit, Rev. 9 was transmitted as the renewal in 2012.
 - Included 37 unit groups.
 - Included all units that were considered “interim status” permits.
 - We received more than 5,000 comments.
 - Additionally, we worked with EPA on their comments to ensure we identified deficiencies.
 - Ecology developed guidance and has worked with Energy on the draft renewal since 2013.



Hanford Sitewide Permit Renewal, Rev. 9A

- Ecology is actively working toward transmitting a revised version of the renewal in 2024.
- We estimate there will be 51 unit groups in the renewal.
 - 15 Operating Unit Groups
 - 2 Corrective Action Unit Groups
 - 32 Closing Unit Groups
 - 2 Post-Closure Unit Groups
 - Standard conditions that apply to all unit groups.
 - Attachments support the standard conditions.
 - Renewal will be more than 20,000 pages in length, includes supporting documentation.



Hanford Sitewide Permit Renewal, Rev. 9A

- Why is it taking so long to complete the renewal?
- Rev. 9A will go out for a 120-day public comment period this year.
- Public Involvement will have many moving parts:
 - Tribal Nation briefings
 - Informational meetings (in-person, online, hybrid)
 - Public hearings (in-person, online)
 - Educational materials
 - Website page, social media
 - Public notices, news release
 - HAB/OHCB briefings
 - eComments site





Questions?

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Sitewide Permit Terminology

- **Hanford Sitewide Permit Renewal, Revision 9A:** The current Hanford Sitewide Permit, Revision 8C is currently going through a renewal. The Hanford Sitewide Permit Revision 9 went out for public review in 2012. More than 5,000 public, Tribal Nation, Energy and Hanford Contractor comments were sent to Ecology. Since then, Ecology has worked with the permittees on the deficient information.
- **Unit Group:** An area within the Hanford Site that manages dangerous waste. There are 51 operating, closing, post-closure and corrective action unit groups in the renewal. For example, the Waste Treatment Plant is a unit group.
- **Dangerous Waste Management Unit:** The term “Unit” or “TSD unit,” as used in Parts I through VI of this permit, means the contiguous area of land on or in which dangerous waste is placed, or the largest area in which there is a significant likelihood of mixing dangerous waste constituents in the same area. A TSD unit, for purposes of this permit, is a subgroup of the facility which has been identified in a Hanford Facility Dangerous Waste Part A Form.

Sitewide Permit Terminology (con't)

- **Dangerous Waste:** Solid wastes designated under Chapter 173-303 WAC as dangerous or extremely hazardous waste. As used in the permit, the phrase “dangerous waste” will refer to the full universe of wastes regulated by Chapter 70A.300 RCW and Chapter 173-303 WAC (including dangerous waste, hazardous waste, extremely hazardous waste, mixed waste, and acutely hazardous waste).
- **Mixed Waste:** Dangerous, extremely hazardous, or acutely hazardous waste that contains both a nonradioactive hazardous component and, as defined in 10 CFR 20.1003, source, special nuclear, or by-product material subject to the Atomic Energy Act of 1954 (42 U.S.C 2011 et seq.)

Sitewide Permit Terminology (con't)

- **Permit Conditions:** Under WAC 173-303-810, Ecology writes permit conditions in dangerous waste permits. The standard conditions for the Hanford Site-wide Permit includes conditions set forth in WAC 173-303
- **Permittees:** U.S. Department of Energy and Hanford Contractors
- **Operating Unit Groups:** Sites that are operational, managing waste (except WTP and IDF)
- **Corrective Action Unit Groups:** Sites that include groundwater operable units, and CERCLA and RCRA operable units.
- **Closing Unit Groups:** Sites that are undergoing closure.
- **Post-Closure Unit Groups:** Sites that are already closed and managed under post-closure regulations.