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SUPPLEMENTAL COMMENTS ON THE
SECOND DRAFT OF THE
RESOURCE CONSERVATION AND RECOVERY ACT PERMIT
FOR THE TREATMENT, STORAGE, AND DISPOSAL OF DANGEROUS WASTE
FOR THE HANFORD FACILITY

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*Place the Supplemental Hanford Site Comments at the end of Attachment 1 of the Hanford Site Comments on the Second Draft Permit dated April 11, 1994.

SUPPLEMENTAL COMMENTS ON DANGEROUS WASTE PORTION OF DRAFT PERMIT¹

SC Category²: Permittee Designation **Key Comment³:** Permittee Responsibilities Permit Implementation

Comment: The Draft Permit requires greater flexibility in accommodating a change in DOE-RL contractors. Consider, as alternative language, the following changes to the Draft Permit:

Condition: Title Page
Page, lines: Page 1, line 26
Requested Action: After "(Owner/Operator)" add the following language, ", and its designated contractors (co-operators)".

Condition: Title Page
Page, lines: Page 1, lines 31-35
Requested Action: Delete reference to Westinghouse Hanford Company and Pacific Northwest Laboratory.

Condition: Introduction
Page, lines: Page 4, lines 13-14
Requested Action: On line 13, add the term "(co-operators)" after word "contractors" and delete the following language. "; Westinghouse Hanford Company (Westinghouse Hanford) (co-operator), and Pacific Northwest Laboratory (PNL) (co-operator)".

Condition: Definitions
Page, lines: Page 9, lines 40-43
Requested Action: Replace the definition for "Contractor(s)" with the following language:

The term 'contractor(s)' means those DOE-RL designated contractors who have certified RCRA Part A and Part B permit application documents for TSD units that have been incorporated into this Permit, unless specifically identified otherwise in this Permit or its attachments.

¹Supplemental to Hanford Site Comments dated April 11, 1994. Supplemental comments have been made only on the Dangerous Waste Portion of the Second Draft Permit. The referenced "Condition" and "Page, lines" refer to locations within the Second Draft Permit that was issued for public comment on February 9, 1994.

²SC = Supplemental Comment.

³Table 1 of the Hanford Site Comments dated April 11, 1994, provides a listing of Key Comments.

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Condition: Definitions
Page, lines: Page 11, lines 1-3
Requested Action: Replace the definition for "Permittees" with the following language:

The term 'Permittees' means the United States Department of Energy, Richland Operations Office (Owner/Operator) and its designated contractors (co-operators).

Condition: Acronyms
Page, lines: Page 12, line 37; page 13, lines 8-9
Requested Action: Delete the references to PNL and Westinghouse Hanford.

Condition: I.A.2.
Page, lines: Page 14, lines 35-43
Requested Action: Delete the second and third paragraphs of this Condition. Add the following paragraph:

A DOE-RL contractor (co-operator) is identified as a Permittee for activities subject to the Conditions of this Permit where its agents, employees, or subcontractors have operational and/or management responsibilities and control.

Justification: The Draft Permit appears to require a Class 3 modification to accommodate a change in DOE-RL contractors managing TSD units. Either the change in DOE-RL contractors, or the Permit schedule, could be adversely impacted by the timing of the Class 3 modification process. Greater Permit flexibility is required to accommodate contractor changes, as the approach to Hanford Site cleanup is trending toward an expansion in the number of DOE-RL contractors who may manage TSD units. This comment outlines an approach that would enable contractor co-operators to be identified on the Part A, Form 3 certification page. A change in contractors could be accommodated through the submittal of a revised Part A, Form 3, rather than through a Permit modification.

In an April 1, 1994 meeting, the Department expressed an interest in exploring more flexible permitting options for accommodating a change in DOE-RL contractors. The approach outlined in this comment was proposed to the Department at a follow up meeting held on April 29, 1994. A permitting mechanism must be in place in the very near future that will accommodate the transference of management responsibilities for environmental restoration work from Westinghouse Hanford Company to Bechtel Hanford, Inc.

SC Category: Inclusion of Interim Status Key Comment: Permitting Approach
 Closure Plans Permit Implementation
Comment: As noted in the Comment Package submittal dated April 11, 1994, the Commenters requested action is to eliminate Part V from the Draft Permit. The Commenters contend that the Department lacks regulatory authority to place an interim status unit that cannot meet final status standards into a final

status permit. In the event that the Department nevertheless decides to retain Part V in the Draft Permit, specific comments have been provided to mitigate the implementation problems. In providing these specific comments, the Commenters do not waive their objections to a Permit containing interim status units. If Part V is not deleted, delete all Part V references from Part II; make specific reference in Part V to the very limited Part II conditions that may be relevant. Retitle Part V as "Unit-Specific Conditions for Interim Status Closures Under Final Status Standards". Specifically, incorporate the following changes:

Condition: Introduction
Page, lines: Page 6, lines 16-28
Requested Action: Replace this paragraph with the following language:

Part V, Unit-Specific Conditions for Interim Status Closures Under Final Status Standards, contains those Permit requirements that apply to each individual TSD unit undergoing interim status closure. Conditions for each interim status TSD unit undergoing closure are found in a Chapter dedicated to that TSD unit. These unit-specific Chapters may contain references to General Conditions (Part II), as well as additional requirements that are intended to ensure that each TSD unit is closed in an efficient and environmentally protective manner.

Condition: Attachments
Page, lines: Page 7, line 6
Requested Action: Delete the reference to Part V from this Condition. Rewrite "Parts I through V" to read "Parts I through IV".

Condition: II.B.1.
Page, lines: Page 26, line 36
Requested Action: Delete the reference to Part V from this Condition. Rewrite "Parts III and V" to read "Part III".

Condition: II.C.3.; II.J.2.; II.K.2.; II.K.3.; II.K.3.a.; II.K.5.; II.L.2.d.; II.O.1.; II.Q.1
Page, lines: Page 27, line 29; page 39, line 29; page 40, lines 22, 30, 39; page 41, line 23; page 43, line 18; page 44, line 27; page 45, line 49
Requested Action: Delete the reference to Part V from these Conditions. Rewrite "Parts III or V" to read "Part III".

Condition: II.I.1.
Page, lines: Page 37, lines 15 and 19
Requested Action: Delete the reference to Part V from this Condition. On line 15, rewrite "Parts III and V" to read "Part III". On line 19, rewrite "Part III or V" to read "Part III".

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Condition: II.J.1.
Page, lines: Page 39, line 22
Requested Action: Delete the reference to Part V from this Condition. Rewrite "Parts III, IV, or V" to read "Parts III or IV".

Condition: II.K.3.b.
Page, lines: Page 40, line 45; page 41, lines 3 and 6
Requested Action: Delete the reference to Part V from this Condition. On lines 45 and 6, rewrite "Parts III or V" to read "Part III". On line 3, rewrite "Parts III of V" to read "Part III".

Justification: The Commenters contend that the Department lacks regulatory authority for directly placing an interim status unit that cannot meet final status standards into a final status permit. Based on this rationale, the Commenters further contend that the permitting approach that should be followed is to eliminate Part V from the Draft Permit. However, if Part V is included, this part should be retitled as requested in this Comment Supplement to indicate that these units are being handled as interim status closures using final status standards. Reference to applicable Part II Conditions only in Part V also will help to mitigate permit implementation ambiguity for both the regulators and the Permittees.

SC Category: Quality Assurance and
Quality Control

Key Comment: Quality Assurance and
Quality Control

Comment: The Draft Permit contains too great a level of detail in the Quality Assurance and Quality Control area. The preferred course of action by the Commenters is to implement the following changes.

Condition: II.E.2.a.; II.E.2.b.; II.E.2.c.; II.E.2.d.
Page, lines: Page 29, lines 15-50; page 30, lines 1-50;
page 31, lines 1-49; page 32, lines 1-50;
page 33, lines 1-3
Requested Action: Delete Conditions II.E.2.a. - II.E.2.d.

Condition: II.E.3.; II.E.3.a.; II.E.3.b.; II.E.3.c.
Page, lines: Page 33, lines 11-49; page 34, lines 1-36
Requested Action: Delete the last sentence in Condition II.E.3.
Delete Conditions II.E.3.a. - II.E.3.c.

Justification: Refer to justification provided for Condition II.E. on ATT 1, page 31 of the Hanford Site Comments dated April 11, 1994.

SC Category: Onsite Transportation

Key Comment: Onsite Waste Movement

Comment: As noted in the Hanford Site Comments dated April 11, 1994, the Commenters requested action is to eliminate Condition II.Q.1. The Commenters contend that there is no regulatory basis requiring the documentation of onsite waste shipments. In the event that the Department nevertheless decides

to retain Condition II.Q.1. in the Draft Permit, specific comments have been provided to mitigate the implementation problems. In providing these specific comments, the Commenters do not waive their objections to a Permit containing requirements for onsite waste shipments. If Condition II.Q.1. is not deleted, the following changes are requested to be made.

Condition: II.I.1.a.
Page, lines: Page 37, lines 23-25
Requested Action: Delete this Condition and rewrite as follows:

Documentation (e.g., waste profile sheets) of all dangerous waste transported to or from any TSD unit subject to this Permit. This documentation shall be maintained in the receiving TSD unit's operating record from the time the waste is received;

Condition: II.I.1.b.
Page, lines: Page 37, lines 26-28
Requested Action: Move this Condition to II.I.1.c. and add a new condition as follows:

The location and quantity of dangerous waste at each final status TSD unit within the Hanford Facility. For final status disposal units on the Hanford Facility, the location and quantity of each dangerous waste must be recorded on a map or diagram of each cell or disposal area. This information must include cross-references to specific manifest document numbers, if the waste was required to be accompanied by a manifest.

Condition: II.Q.1.
Page, lines: Page 45, lines 37-49;
Requested Action: Rewrite this Condition to read as follows:

Documentation must accompany any onsite dangerous waste that is transported to or from any TSD unit through or within the 600 Area, unless the roadway is closed to general public access at the time of shipment. Waste transported by rail or by pipeline is exempt from this Condition. This documentation shall include the following information, unless other unit-specified provisions are designated in Part III.

Justification: The Commenters contend that the Department lacks regulatory authority for imposing conditions regulating the movement of waste onsite. Based on this rationale, the Commenters requested action is to eliminate Condition II.Q.1. from the Draft Permit. The alternative language is most closely aligned with "best management practices" used to manage waste movement on the Hanford Facility.

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SC Category: Permit Consistency **Key Comment:** Permit Implementation
Comment: Make the following changes to promote consistency and ease of permit implementation:

Condition: Introduction; I.A.2.
Page, lines: Page 5, lines 12-14; page 6, lines 1-6;
page 14, line 31
Requested Action: Replace "USDOE" with "DOE-RL" in each of the seven occurrences.

Condition: List of Attachments
Page, lines: Page 7, lines 16-17
Requested Action: For Attachment 1, delete "May 1989" and replace "(As Amended)" with "as amended".

Condition: List of Attachments
Page, lines: Page 7, lines 23-24; 34-36; 43-48;
Page 8, lines 1-19
Requested Action: For Attachments 4, 8, and 11 through 18, delete the date and the revision reference and replace with "as amended".

Condition: List of Attachments
Page, lines: Page 7, lines 28-29
Requested Action: For Attachment 6, replace "Revision 0" with "as amended".

Condition: List of Attachments
Page, lines: Page 7, lines 43-44
Requested Action: For Attachment 11, delete "Part A Application and the".

Condition: Acronyms
Page, lines: Page 12, line 5
Requested Action: Add ", Region 10" to the end of the acronym definition for AGENCY.

Condition: Acronyms
Page, lines: Page 12, lines 17-18
Requested Action: Rewrite the Acronym definition for DOE-RL to read "U.S. Department of Energy, Richland Operations Office".

Condition: Acronyms
Page, lines: Page 12, lines 28 and 30
Requested Action: On line 28, add "of 1976" to the acronym definition of HWMA. On line 30, add "(WAC-173-340)" to the acronym definition of MTCA.

Condition: Acronyms
Page, lines: Page 12, line 45
Requested Action: Add the acronym definition for "SAP"; "sampling and analysis plan".

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Condition: Acronyms
 Page, lines: Page 13, lines 4-5
 Requested Action: Delete the acronym "USDOE" from this list.

Condition: II.E.1.
 Page, lines: Page 29, lines 1-10
 Requested Action: Beginning on line 1, rewrite the first sentence to read as follows:

"All WAPs and sampling and analysis plans (SAPs) required by this Permit shall include a quality assurance and quality control (QA/QC)..."

Rewrite the last sentence to read as follows:

"The QA/QC plan may be part of a WAP or a SAP."

Condition: II.F.2.b.; II.L.2.d.; II.R.2.
 Page, lines: Page 35, line 38; page 43, line 15; page 46, line 31
 Requested Action: Insert "Facility" in front of "operating".

Condition: III.1.B.s.
 Page, lines: Page 56, line 19
 Requested Action: Insert "TSD unit-specific" in front of "Operating Record".

Condition: II.I.1.; II.L.2.b.; II.N.3.
 Page, lines: Page 37, lines 13, 15, 18; page 42, line 31; page 44, line 16
 Requested Action: Insert "TSD" in front of "unit-specific".

Condition: II.K.6.; II.L.2.b.; II.L.2.c.
 Page, lines: Page 41, line 33; page 42, lines 24, 44
 Requested Action: Change "unit" to "unit-specific".

Justification: These changes will promote consistency and ease of Permit implementation.

SC Category: Part III Changes Key Comment: Permit Implementation
 Comment: Make the following changes to Part III:

Condition: III.1.A.
 Page, lines: Page 51, line 16
 Requested Action: Replace "Rev. 2" with "as amended".

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Condition: III.1.A.
 Page, lines: Page 51, lines 29-32, 45-46;
 page 52, lines 1-4, 8-9
 Requested Action: Delete references to Sections 2.5 and 2.7,
 Chapter 10.0, Sections 13.7 and 13.8, and Appendix 4A.

Condition: III.1.A.
 Page, lines: Page 52, lines 7 and 17
 Requested Action: On line 7, insert reference to Appendix 3A,
*616 Nonradioactive Dangerous Waste Storage Facility Waste Analysis
 Plan*. On line 17, insert references to Appendix 8A, *RCRA
 Training*; Appendix 8C, *Training Course Descriptions*; and Appendix
 8D, *Dangerous Waste Training Requirements Listed by Employee
 Worker Category and Name*.

Condition: III.1.B.a., y., ff., and gg.
 Page, lines: Page 52, lines 22-24; page 56, lines 48-49;
 page 57, lines 33-50
 Requested Action: Delete these conditions.

Condition: III.2.A.
 Page, lines: Page 59, line 14
 Requested Action: After the words "Permit Application," insert
 the words "as amended,".

Condition: III.2.A.
 Page, lines: Page 59, lines 26-31, 44-45; page 60, lines 1-4
 Requested Action: Delete references to Sections 2.5, 2.6, and
 2.7, Chapter 10.0, and Sections 13.8 and 13.9.

Condition: III.2.A.
 Page, lines: Page 60, line 7
 Requested Action: On line 7, insert reference to Appendix 3A,
305-B Storage Unit Waste Analysis Plan.

Condition: III.2.B.w.; III.2.B.y.; III.2.B.z.; III.2.B.aa.
 Page, lines: Page 64, lines 42-45; page 65, lines 1-16
 Requested Action: Delete these conditions.

Justification: The requested changes will update the Conditions, promote consistency with incorporated portions of the TSD unit-specific permit applications, and facilitate permit implementation. The recordkeeping requirement in WAC 173-303-145 was deleted in 1992 by the Department.

SC Category: Part V Changes

Key Comment: Permitting Approach
 Permit Implementation

Comment: As noted in the Comment Package submittal dated April 11, 1994, the Commenters requested action is to eliminate Part V from the Draft Permit. The Commenters contend that the Department lacks regulatory authority to place an interim status unit that cannot meet final status standards into a final

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status permit. In the event that the Department nevertheless decides to retain Part V in the Draft Permit, specific comments have been provided to mitigate the implementation problems. In providing these specific comments, the Commenters do not waive their objections to a Permit containing interim status units. If Part V is not deleted, make the following changes to Part V:

Condition: Part V.
Page, lines: Page 67, line 1
Requested Action: Change the section heading to read as follows:

**PART V - UNIT-SPECIFIC CONDITIONS FOR INTERIM STATUS CLOSURES
 UNDER FINAL STATUS STANDARDS**

Part V contains those Permit requirements that apply to each individual TSD unit undergoing interim status closure. Conditions for each interim status TSD unit undergoing closure are found in a Chapter dedicated to that TSD unit. These unit-specific Chapters may contain references to General Conditions (Part II), as well as additional requirements that are intended to ensure that each TSD unit is closed in an efficient and environmentally protective manner.

Condition: V.1.A.
Page, lines: Page 67, lines 14-50;, page 68, lines 1-15
Requested Action: Replace this condition with the following language:

V.1.A. COMPLIANCE WITH APPROVED CLOSURE PLAN

The Permittees shall comply with all the requirements in the 183-H Solar Evaporation Basins Closure Plan/Postclosure Plan (Plan) portions incorporated into the Permit, as amended, in Section V.1-B of this Permit. Portions of the Plan incorporated into this Permit are as follows:

V.1.A.a. Facility Description and Maps of Facility Location, consisting of:

Subsection I.1, pages I-1 and I-2

Figure I.A-1, page I-3

Figure I.A-2, page I-4

Figure I.A-3, page I-5

Appendix A, page A-1, and maps.

V.1.A.b. Security Procedures, consisting of:

Subsection I.1, page I-2.

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V.1.A.c. Personnel Training Plan, consisting of:
 Appendix N, including all figures and tables, pages APP N-1 through APP N-7.

V.1.A.d. Closure Plan, consisting of:
 Chapter I.B, including all figures and tables, pages I-67 through I-150.

V.1.A.e. Closure Plan Schedule, consisting of:
 Subsection I.B-7, pages I-143 through I-147
 Figure I.B-20, page I-144.

Condition: V.1.B.d.
Page, lines: Page 68, line 34
Requested Action: Replace the telephone number (509) 376-7277 with (509) 376-6628.

Condition: V.1.B.e.
Page, lines: Page 68, lines 36-43
Requested Action: Delete this condition.

Condition: V.1.B.i.
Page, lines: Page 69, lines 15-16
Requested Action: Delete "the Westinghouse Hanford Company document" from this paragraph.

Condition: V.1.B.j.
Page, lines: Page 69, lines 22-28
Requested Action: On lines 23-24, replace "within 30 days of the effective date of this Permit" with "within 30 days after data validation".

Condition: V.1.B.k.
Page, lines: Page 69, lines 29-35
Requested Action: On lines 31-32, replace "within 30 days of the effective date of this Permit" with "within 30 days after data validation".

Condition: V.1.B.m.
Page, lines: Page 70, lines 6-7
Requested Action: Beginning on line 6, delete "documentation including, if necessary, the result of sampling per Conditions V.1.B.h through V.1.B.l." and replace with "documentation".

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Condition: V.1.B.u.
 Page, lines: Page 71, lines 17-21
 Requested Action: Rewrite this condition to read as follows:

If landfill closure is necessary, a revision to the "Final Status Postclosure Permit Application, 183-H Solar Evaporation Basins," as amended, shall be submitted pursuant to Condition I.C.3.. A schedule for submitting this postclosure permit application will be established in the FFACO Action Plan, M-20-00 milestone.

Condition: V.2.A.
 Page, lines: Page 72, lines 11-46
 Requested Action: Replace this condition with the following language:

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V.2.A. COMPLIANCE WITH THE APPROVED CLOSURE PLAN

The Permittees shall comply with all the requirements in the 300 Area Solvent Evaporator Closure Plan (Plan) portions incorporated into the Permit, as amended, in Section V.2.B of this Permit. Portions of the Plan incorporated into this Permit are as follows:

V.2.A.a. Facility Description and Maps of Facility Location, consisting of:

Subsection 1.1.1, page 1-3

Figure 1-1, page 1-4

Figure 1-2, page 1-5

Figure 1-3, page 1-6.

V.2.A.b. Security Procedures, consisting of:

Subsection 1.2, pages 1-21.

V.2.A.c. Personnel Training Plan, consisting of:

Chapter 8.0, including all figures and tables, pages 8-1 through 8-6.

V.2.A.d. Closure Plan, consisting of:

Chapter 3.0, including all figures and tables, pages 3-1 through 3-14

Chapter 4.0, page 4-1

Chapter 5.0, page 5-1

Chapter 6.0, pages 6-1 through 6-4

Appendix E, including all figures and tables, pages APP E-1 through E-42.

V.2.A.e. Closure Plan Schedule, consisting of:

Subsection 3.5, pages 3-9 and 3-13

Table 3-3, page 3-13.

Condition: V.2.B.
Page, lines: Page 73, line 46
Requested Action: Add a new condition with the following language:

Page 5-2, line 6. The date of "October 1992" is deleted and replaced with "the first October after the effective date of this Permit.

Condition: V.2.B.e.
Page, lines: Page 73, line 28
Requested Action: Insert "levels above MTCA health-based" in front of "action" and behind "levels" on line 28.

Condition: V.3.A.
Page, lines: Page 74, lines 11-46
Requested Action: Replace this condition with the following language:

V.3.A. COMPLIANCE WITH THE APPROVED CLOSURE PLAN

The Permittees shall comply with all the requirements in the 2727-S Nonradioactive Dangerous Waste Storage Facility Closure Plan (Plan) portions incorporated into the Permit, as amended, in Section V.3.B of this Permit. Portions of the Plan incorporated into this Permit are as follows:

V.3.A.a. Facility Description and Maps of Facility Location, consisting of:

Subsection 1.1, pages 1-1 and 1-3

Subsection 1.3, pages 1-7 and 1-9

Figure 1, page 1-2

Figure 2, page 1-4

Figure 3, page 1-5

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Figure 4, page 1-6

V.3.A.b. Security Procedures, consisting of:

Section 1.2, pages 1-3 and 1-7.

V.3.A.c. Personnel Training Plan, consisting of:

Chapter 6.0, including all figures and tables, pages 6-1 through 6-2

Appendix H, including all figures and tables, pages APP H-1 through APP H-6.

V.3.A.d. Closure Plan, consisting of:

Chapter 4.0, including all figures and tables, pages 4-1 through 4-13

Appendix F, including all figures and tables, pages APP F-1 through F-12

Appendix G, including all figures and tables, pages APP G-1 through G-22.

V.3.A.e. Closure Plan Schedule, consisting of:

Chapter 7.0, including all figures and tables, pages 7-1 through 7-2

Appendix F, including all figures and tables, pages APP F-1.

Condition:	V.3.B.e.
Page, lines:	Page 75, lines 27-31
Requested Action:	On line 28, insert "as specified in Condition II.K.," between the words "concentrations" and "cannot".

Justification. Refer to justification for "Inclusion of Interim Status Closure Plans" Supplemental Comment.

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CHANGES TO HANFORD SITE COMMENTS DATED APRIL 11, 1994⁴**Comment Location:** Page 4**Change:** In paragraph 1, replace "WAC 173-303-805(8)(c)" with "WAC 173-303-805(8)(a)".**Comment Location:** Page 6**Change:** In paragraph 7, replace "Definitions Comments, pages 103-104" with "Definitions Comments, pages 102-103".**Comment Location:** Page 8**Change:** In paragraph 1, replace "Facility-wide Groundwater Monitoring" with "Groundwater Monitoring".

In paragraph 4, replace "(Appendix 1, A.3 and B.6.A)]" with "(Appendix 1, A.3 and B.6.b)]". Replace "has been estimated to in excess" with "has been estimated to be in excess".

Comment Location: Page 9**Change:** In paragraph 3, replace "(in Sections 6.5 and 7.8)" with "(in Sections 6.5 and 7.8 of the Action Plan)".

In last paragraph, delete "Federal" on page 9 and "Building and the" on page 10.

Comment Location: ATT 1, page 3, Table of Contents**Change:** In CS Comment section, delete "and WAC 173-303-805(8)(c)".**Comment Location:** ATT 1, page 7, Introduction**Change:** In CS Comment section, sentence 1, replace "WAC 173-303-805(8)(c)" with "WAC 173-303-805(8)(a)".**Comment Location:** ATT 1, page 8**Change:** Remove the quotation marks from paragraph 2.

In paragraph 4, replace "(General Comment 72, page 73)" with "(General Comment 71, page 73)".

Comment Location: ATT 1, page 10, Definitions**Change:** Replace Requested Action section with:

Requested Action: Add the words "the dangerous component of" before the word "mixed." Add the following sentence to the end of the definition:

Dangerous waste does not include the source, special nuclear, and byproduct material components of mixed waste.

⁴"Comment Location" refers to location within Hanford Site Comments on the Second Draft Permit dated April 11, 1994.

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Alternatively, incorporate a definition for mixed waste from either the FFACO or WAC 173-303-040.

Comment Location: ATT 1, page 14, Definitions (First Listing)

Change: Replace Requested Action section with:

Requested Action: Delete the existing text.

Comment Location: ATT 1, page 15, Condition I.A.1.a.

Change: In Justification, replace "Environmental, Inc: Washougal, Georgetown," with "Environmental, Inc: Georgetown, Washougal".

Comment Location: ATT 1, page 20, Condition I.E.10.c.

Change: In "i.", change "The date, specific location," to "The date, exact place,".

Comment Location: ATT 1, page 23, Condition I.E.14.

Change: In Justification section, change "WAC 173-303-830(3)(c) to "WAC 173-303-830(3)(a)".

Comment Location: ATT 1, page 25, Condition I.E.18.

Change: In Requested Action section, change the revision of the last sentence to read:

Whenever dangerous waste received from offsite sources without a manifest, the Permittees shall submit a report ...

Comment Location: ATT 1, page 31, Condition II.D.3.(vii)

Change: In Requested Action section, replace "y A procedure for identifying..." with "y A procedure for identifying each offsite waste movement arriving at the TSD unit; and,".

Comment Location: ATT 1, page 32

Change: In Justification section, paragraph 2, change "Condition II.E.2.b.xxi" to "Condition II.E.2.b.xii".

Comment Location: ATT 1, page 33, Condition II.E.2.

Change: In Requested Action section, change the revision of the Condition to read:

Each QA/QC plan shall contain a data quality assurance plan or equivalent information. The level of QA/QC for the collection, preservation, transportation, and analysis of each sample that is required for implementation of this Permit may be based on Department approved data quality objectives for the sample. These data quality objectives shall be approved by the Department, in writing, or through incorporation of TSD unit QA/QC plans into Part III of this Permit.

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Comment Location: ATT 1, page 38

Change: In Justification section, paragraph 3, item "(3)", change "\$7M" to "\$7K".

Comment Location: ATT 1, page 41, Condition II.H.

Change: In Justification section, within the quotation, change "WAC 173-303-620(1)(b)" to "WAC 173-303-620(1)(c)".

Comment Location: ATT 1, page 52, Condition II.N.1.

Change: In Justification section, paragraph 3, delete "Federal Building and the".

Comment Location: ATT 1, page 66, Condition III.1.A. (First Listing)

Change: From CS Comment section, remove the word "many".

Comment Location: ATT 1, page 67, Condition III.1.B.

Change: Under Requested Action section, item "1.", change "H-6-1566" to "H-6-1556".

Comment Location: ATT 1, page 75, Condition I.I.1.

Change: In Justification section, remove "not administrative agencies" from end of sentence.

Comment Location: ATT 1, page 77, Condition II.C.1

Change: In Requested Action section, change "Permittees are" to "Permittee is".

Comment Location: ATT 1, page 78, Condition II.D.

Change: In the first line of this page, change "Permittees" to "Permittee".

Comment Location: ATT 1, page 78, Condition III.A.1.

Change: In Justification section, delete "and its contractors".

Comment Location: ATT 1, page 79, Condition III.C through III.J and Attachments A through E

Change: In CS Comment section, paragraph 3, remove "and its contractors".

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