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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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January 7, 1993

9301678

Mr. C. E. Clark
Office of Environmental Assurance,
Permits, and Policy
U.S. Department of Energy
P.O. Box 550
Richland, WA 99352

Dear Mr. Clark:

Re: Hanford Waste Vitrification Plant Dangerous Waste Permit
Application Notice of Deficiency (NOD) status. TPA Milestone M-
03-00

Ecology has recently reviewed with your staff the Hanford Waste Vitrification Plant (HWVP) NOD Response Table, which was included as part of the Hanford Waste Vitrification Plant Dangerous Waste Permit Application, Revision 2, and has concluded that all of the 128 deficiencies contained in this table be closed for administrative purposes. Since the HWVP is presently proceeding under interim status, spending staff time resolving deficiencies which may not be issues in the final HWVP design and dangerous waste permit application is not warranted. We presently anticipate that dangerous waste application for the HWVP will be submitted when the final design is nearing completion. The present schedule for the HWVP design completion is December 1994. We expect the HWVP submittal will be a complete application, not just additions to the old revision 2 application, however applicable information contained in the old application may be reused.

The attached HWVP NOD Status table contains 128 Ecology deficiencies and the present or recommended status. It is our recommendation that all of the deficiencies be closed for the following general reasons:

1. The deficiency was previously closed as indicated by the closure date;
2. The deficiency is a site-wide issue which will be addressed in the site-wide permit;
3. The deficiency was addressed in the revision 2 application;
4. The deficiency will be addressed when the design is completed.



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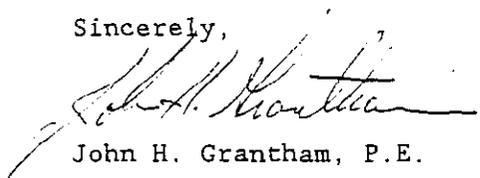
Mr. C. E. Clark
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When the next HWVP permit application submittal is reviewed, the deficiencies closed by reasons 2, 3, and 4 above will be revisited to insure that they have been adequately addressed. If they have not been adequately addressed, they will be reopened and added to a new NOD list.

The attached list also includes a NOD list generated by EPA. Specific comments from EPA will be transmitted under separate cover.

The help and cooperation provided by you and your staff to resolve this matter in a timely fashion is sincerely appreciated. Should you have any comments with regard to the above, please contact me (206) 438-7745.

Sincerely,


John H. Grantham, P.E.

JG:lj

cc Bob Brown, DOE
Mike Cline, WHC
Dan Duncan, EPA
Joe LaRue, WHC
Steven Wisness, DOE

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HWVP NOD STATUS

October 5, 1992

NOD #	Subject	Status	Date	Rationale
1	Interim Status	Closed	5/24/90	
2	Critical Systems	Closed	1/22/91	
3	Precoat Feed Tank	Closed	1/22/91	
4	Wastewater	Recommend Close		Rev 2
5	Topo Map	Closed	1/22/91	
6	Release Site	Closed	1/22/91	
7	Topo Map	Closed	5/24/90	
8	Flood Plain	Closed	1/22/91	
9	Air Emissions	Recommend Close		N/A
10	Offgas	Closed	1/22/91	
11	Excavation	Closed	1/22/91	
12	Buffer Monitoring Zones	Recommend Close		Rev 2
13	Permitting Schedule	Recommend Close		N/A
14	DW Storage Areas	Closed	1/22/91	
15	Waste Designation	Closed	1/22/91	
16	Transfer Data Sheet	Closed	5/24/90	
17	Waste Type Start Dates	Closed	5/24/90	
18	HWVP Permit Scope	Recommend Close		Rev 2
19	Radionuclide	Recommend Close		Site Issue
20	Air Emissions	Recommend Close		Rev 2
21	Waste Designation	Closed	5/24/90	
22	Table 3-1	Closed	1/22/91	
23	Units	Closed	5/24/90	
24	Mercury	Recommend Close		Rev 2
25	Table 3-3	Closed	5/24/90	
26	Oxalic Acid Toxicity	Closed	5/24/90	
27	Production Rates	Closed	5/24/90	
28	Melter DF Definition	Closed	5/24/90	
29	Vitrified Waste Designation	Closed	1/22/91	
30	Table 3-6	Closed	5/24/90	
31	Waste Characterization	Closed	5/24/90	
32	Tank Vents	Closed	5/24/90	
33	Incinerator Regs	Recommend Close		Rev 2
34	Sample Schedule	Recommend Close		Rev 2
35	Sample Schedule	Recommend Close		Rev 2
36	Cell and Floor Drains	Recommend Close		N/A
37	EPA Protocol (Deviation)	Closed	1/22/91	
38	QA/QC Plan	Closed	5/24/90	
39	EPA Protocol (Deviation)	Closed	1/22/91	
40	Analytical Inferences	Closed	1/22/91	
41	Table 3-8 Reference	Closed	1/22/91	
42	Accumulation of Gases	Closed	1/22/91	
43	Glass Designation	Recommend Open		HWVP Issue
44	Evaporation Tank Sample	Recommend Close		Rev 2
45	Tank Leak Response	Closed	1/22/91	
46	Tank Integrity Assessment	Closed	1/22/91	
47	Materials of Construction	Recommend Close		Design Related
48	Tank Integrity Assessment	Closed	5/24/90	
49	Operating Rate	Closed	1/22/91	
50	Tank Integrity Assessment	Recommend Close		Design Related
51	Comingling Tank Leaks	Closed	5/24/90	

HWVP NOD STATUS

October 5, 1992

NOD #	Subject	Status	Date	Rationale
52	Evap Tank Freeboard	Closed	1/22/91	
53	Air Monitors	Recommend Close		Design Related
54	Mixing Incompatible Waste	Recommend Close		Design Related
55	Melter Classification	Closed	1/22/91	
56	Contingency Plan	Closed	1/22/91	
57	Closure Standards	Recommend Close		Site Issue
58	Waste Inventory	Closed	1/22/91	
59	Baseline Soil Sampling	Recommend Close		Rev 2
60	Closure Cost Estimates	Recommend Close		Site Issue
61	WAC Citation	Closed	5/24/90	
62	WAC Citation	Closed	5/24/90	
63	Define Abbreviations	Closed	5/24/90	
64	Incorrect reference	Closed	1/22/91	
65	SEPA Checklist Submittal	Closed	5/24/90	
66	Define Co-Operator	Recommend Close		Site Issue
67	Completeness	Recommend Close		N/A
68	Submittal Schedule	Recommend Close		N/A
69	Modification Classes	Recommend Close		Rev 2
70	NRC Petition	Recommend Close		N/A
71	WAC Citation	Recommend Close		Rev 2
72	Solvent Waste	Recommend Close		Completeness
73	Container Labeling	Recommend Close		Rev 2
74	Record Retention	Recommend Close		Rev 2
75	Stream Destination	Recommend Close		Rev 2
76	TCLP Citation	Recommend Close		Rev 2
77	Data Units	Recommend Close		Rev 2
78	Melter Feed Data	Recommend Close		Rev 2
79	Ref. Feed Designation	Recommend Close		Rev 2
80	Organic Designation	Recommend Close		Rev 2
81	Ref. Feed Constituents	Recommend Close		Rev 2
82	Designation Citation	Recommend Close		Rev 2
83	Secondary Waste TBD	Recommend Close		Process Development
84	Carcinogenicity	Recommend Close		Rev 2
85	Secondary Waste Designation	Recommend Close		Rev 2
86	Discrepancy	Recommend Close		Rev 2
87	Formic Acid Designation	Recommend Close		Rev 2
88	Miscellaneous Unit	Recommend Close		Rev 2
89	Sample Points	Recommend Close		Rev 2
90	Sample Schedule	Recommend Close		Schedule
91	EPA Protocol	Recommend Close		Rev 2
92	Out-of-Spec Melter Feed	Recommend Close		N/A
93	Include Flow Diagrams	Recommend Close		Rev 2
94	Underground pipe labeling	Recommend Close		Site Issue
95	Waste Designation	Recommend Close		Waste Characterization
96	Waste Mixing Compatibility	Recommend Close		Detailed Related
97	Miscellaneous Unit	Recommend Close		Rev 2
98	Fig 4-2 Omission	Recommend Close		Rev 2
99	Include Melter Tank ID	Recommend Close		Rev 2
100	Waste Hold Tank Capacity	Recommend Close		Rev 2
101	Formic Acid Ignition	Recommend Close		Completeness
102	Contingency Plan	Recommend Close		Site Issue

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HWVP NOD STATUS

October 5, 1992

NOD #	Subject	Status	Date	Rationale
103	Waste Inventory	Recommend Close		Rev 2
104	Closure Schedule	Recommend Close		Rev 2
105	Closure Schedule	Recommend Close		Rev 2
106	Delete Non-radioactive	Recommend Close		Rev 2
107	Onsite waste Shipments	Recommend Close		Rev 2
108	Spill Notification	Recommend Close		Rev 2
109	Record Retention Time	Recommend Close		Rev 2
110	Missing page to APP-3A	Recommend Close		Rev 2
111	Provide Culvert Design	Recommend Close		Design Related
112	Survey Monuments	Recommend Close		Design Related
113	Construction Survey Information	Recommend Close		Design Related
114	Existing UG Piping Layout	Recommend Close		Design Related
115	Railway Code Conformance	Recommend Close		Design Related
116	Railway Design	Recommend Close		Design Related
117	Railway Design	Recommend Close		Design Related
118	Railway Design	Recommend Close		Design Related
119	Roadway Design	Recommend Close		Design Related
120	Fire Design Basis	Recommend Close		Design Related
121	Fire Water Design Basis	Recommend Close		Design Related
122	Fire Water Design Basis	Recommend Close		Design Related
123	Fire Water Design Basis	Recommend Close		Design Related
124	Fire Water Design Basis	Recommend Close		Design Related
125	Raw Water Design Basis	Recommend Close		Design Related
126	Fire Water Design Basis	Recommend Close		Design Related
127	Septic Tank Design Calcs.	Recommend Close		Design Related
128	Storm Water Design Basis	Recommend Close		Design Related

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HWVP NOD STATUS

October 5, 1992

NOD #	Subject	Status	Date	Rationale
A.1	Miscellaneous Unit	Recommend Close		Rev 2
A.2	Topographic Map	Recommend Close		Rev 2
B.1	Miscellaneous Unit	Recommend Close		Rev 2
B.2	Topographic Map	Recommend Close		Rev 2
B.3	Traffic	Recommend Close		Rev 2
C.1	Feed Data	Recommend Close		Rev 2
C.2.a	W.A.P.	Recommend Close		Rev 2
C.2.b	Analytical Methods	Recommend Close		Site Issue
C.2.c	Sampling Methods	Recommend Close		Site Issue
C.2.d	Sample Schedule	Recommend Close		Rev 2
* C.2.e	QA/QC	Recommend Close		Completeness
* D.1.a.i	System Design Details	Recommend Close		Completeness
D.1.a.ii	System Design Details	Recommend Close		Completeness
D.1.b	Performance Standards	Recommend Close		Not Applicable
D.1.c	Waste Characterization	Recommend Close		Completeness
D.1.d	Detailed Design	Recommend Close		Design Related
* D.1.e	Site Air Conditions	Recommend Close		Rev 2
* D.1.f	Detailed Design	Recommend Close		Design Related
* D.1.g	Operating Standards	Recommend Close		Completeness
D.1.h	Hydrogeologic Conditions	Recommend Close		Rev 2
D.1.i	Site Precipitation	Recommend Close		Rev 2
D.1.j	Groundwater Usage	Recommend Close		Not Applicable
D.1.k	Surface Waters	Recommend Close		Rev 2
D.1.l	Land Use	Recommend Close		Rev 2
D.1.m	Migration of Waste	Recommend Close		In PSAR
D.1.n	Safety Analysis	Recommend Close		In PSAR
* D.1.o	Trial Burn	Recommend Close		Completeness
* D.1.p	Trial Burn	Recommend Close		Completeness
F.1	Security	Recommend Close		Rev 2
* F.2.a.i	Inspection Plan	Recommend Close		Completeness
F.2.a.ii	Inspection Schedule	Recommend Close		Completeness
F.2.b	Process Inspections	Recommend Close		Completeness
F.3.a	Aisle Space	Recommend Close		Rev 2
F.3.b	Underground Piping	Recommend Close		Rev 2
F.3.c	Aisle Space	Recommend Close		Rev 2
* F.4.a	Design Basis Accidents	Recommend Close		Completeness
* F.4.b	Run on/Run off	Recommend Close		Completeness
* F.4.c	Water Supplies	Recommend Close		Completeness
* F.4.d	Design Specifics	Recommend Close		Completeness
* F.5.a	Safety Precautions	Recommend Close		Completeness
* F.5.b	Safety Precautions	Recommend Close		Completeness
* G.1	Contingency Plan	Recommend Close		Completeness
* G.2	Contingency Plan	Recommend Close		Completeness
* G.3	Contingency Plan	Recommend Close		Completeness
G.4	Personnel Phone Numbers	Recommend Close		Site Issue
G.5	Notification	Recommend Close		Rev 2
* G.6	Building Emergency Plan	Recommend Close		Completeness
G.7	Contingency Plan	Recommend Close		Not Applicable
* G.8	Contingency Plan	Recommend Close		Completeness
H.1	HWVP Training	Recommend Close		Rev 2
H.2	HWVP Training	Recommend Close		Rev 2

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HWVP NOD STATUS

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NOD #	Subject	Status	Date	Rationale
H.3	HWVP Training	Recommend Close		Rev 2
I.1	Closure Standards	Recommend Close		Site Issue
I.2	Closure Standards	Recommend Close		Rev 2
I.3	Waste Inventory	Recommend Close		Rev 2
I.4	Closure Plan	Recommend Close		Completeness
I.5	Containment Models	Recommend Close		Completeness
I.6	Soil Sampling Plan	Recommend Close		Rev 2
I.7	Incinerator Closure	Recommend Close		Completeness
I.8	Closure Schedule	Recommend Close		Completeness
I.9	Closure Schedule	Recommend Close		Completeness
J.1	Waste Minimization	Recommend Close		Site Issue
J.2	Waste Minimization	Recommend Close		Site Issue
J.2.a	Waste Minimization	Recommend Close		Site Issue
J.2.b	Waste Minimization	Recommend Close		Site Issue
J.2.c	Waste Minimization	Recommend Close		Site Issue
J.2.d	Waste Minimization	Recommend Close		Site Issue
J.2.e	Waste Minimization	Recommend Close		Site Issue
J.2.f	Waste Minimization	Recommend Close		Site Issue

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