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Department of Energy
Richland Operations Office
P.O. Box 550
Richland, Washington 99352

98-EAP-527

SEP 24 1998

Ms. Laura J. Cusack
Hanford Facility RCRA Permit Manager
Nuclear Waste Program
State of Washington
Department of Ecology
1315 West Fourth Avenue
Kennewick, Washington 99336-6018



Dear Ms. Cusack:

HANFORD SITE COMMENTS ON THE MODIFICATION PACKAGE ISSUED FOR PUBLIC COMMENT ON AUGUST 10, 1998, FOR THE HANFORD FACILITY RESOURCE CONSERVATION AND RECOVERY ACT (RCRA) PERMIT, DANGEROUS WASTE PORTION

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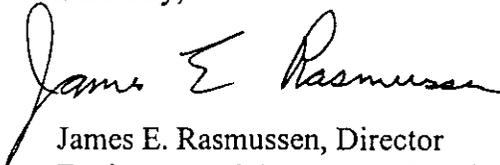
The U.S. Department of Energy, Richland Operations Office (RL); Fluor Daniel Hanford, Inc. (FDH); Pacific Northwest National Laboratory (PNNL); and Bechtel Hanford, Inc. (BHI) jointly are submitting the "Hanford Site Comments on the Modification Package Issued for Public Comment on August 10, 1998, for the Hanford Facility Resource Conservation and Recovery Act (RCRA) Permit, Dangerous Waste Portion" (hereinafter termed the "Comment Document"). This Comment Document was prepared in response to a State of Washington Department of Ecology (Ecology) request for comments initiated on August 3, 1998. This is the first of two comment document packages to be submitted to Ecology concerning the August 3, 1998, Modification Package. The second package will be submitted on or before November 9, 1998, at the end of the 45-day comment period extension granted by Ecology, as outlined in your September 18, 1998, letter. The second package will include comments on those conditions that require additional time for comment preparation due to the complexity of the issues.

The permittees generally support adoption of the proposed permit modifications included in this Comment Document submittal; however, there are a few specific areas that merit further consideration by Ecology. The Comment Document addresses those areas that could be enhanced by additional clarification or explanation. Incorporation of these comments into the modification will enhance efforts to meet our collective objective of ensuring the most expeditious, efficient, and comprehensive cleanup of the Hanford Facility. We request incorporation of these comments in the spirit of continuing open communication with, and responsiveness to, your organization.

SEP 24 1998

Should you have any questions regarding this information, please contact Ellen M. Mattlin, RL, on (509) 376-2385; Susan M. Price, FDH, on (509) 376-1653; Harold T. Tilden II, PNNL, on (509) 376-0499; or Roger J. Landon, BHI, on 372-9209.

Sincerely,



James E. Rasmussen, Director
Environmental Assurance, Permits,
and Policy Division
DOE Richland Operations Office

EAP:EMM



William D. Adair, Director
Environmental Protection
Responsible party for
Fluor Daniel Hanford, Inc.



Roger C. Landon
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Richard S. Watkins, Director
Environment, Safety, and Health
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Enclosure:
Hanford Site Comments on the
Modification Package Issued for Public
Comment On August 10, 1998, for the
Hanford Facility RCRA Permit, DW Portion

cc w/encl:
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**Hanford Site Comments on the Modification Package
Issued for Public Comment on August 10, 1998,
for the Hanford Facility RCRA Permit,
Dangerous Waste Portion
(First Package: Due September 24, 1998)**

Page 1 of 14

Comments on General Conditions

1. **List of Attachments, Attachment 4:** "Attachment 4: Hanford Emergency Response Plan, DOE/RL-94-02, Release 13, July 1, 1998."

Requested Action: Revise Attachment 4 to read "Hanford Emergency Response Plan, DOE/RL-94-02."

Comment Justification: The Hanford Emergency Response Plan (the Plan) is frequently revised via "releases" (updated pages) to reflect up to date information. Ecology has review and approval authority via Permit Condition II.A.3., for revisions to portions of the Plan utilized for RCRA compliance (see Appendix A of the Plan for a listing of those sections). As not all revisions will require Ecology prior approval, it would not be advisable to maintain Release 13 of the Plan as the master document for RCRA compliance while continuing to produce and distribute subsequent releases for non-RCRA purposes. To do so would violate the spirit of the implementation plan jointly developed by DOE-RL, contractors and regulators as a corrective action following the PRF incident. Field operations are likely to maintain only the current release of the Plan as their operating requirement document.

The Permittees propose that Ecology reference the Plan as requested. The Permittees will assure that all subsequent releases of the Plan are provided to Ecology as they are distributed to the other copyholders listed in the Plan.

2. **Condition II.A.1.:** "The Permittees shall immediately carry out the provisions of the Hanford Emergency Response Plan as provided in Attachment 4, pursuant to WAC 173-303-360(2), whenever there is a release of dangerous waste or dangerous waste constituents, or other emergency circumstance, either of which threatens human health or the environment."

Requested Action: Revise the sentence to read as follows: "The Permittees shall immediately carry out applicable provisions of the Hanford Emergency Response Plan ... whenever there is a fire (other than range fires), explosion, or release of dangerous waste or dangerous waste constituents which could threaten human health or the environment."

Comment Justification: Ecology is attempting to assure compliance with contingency plan procedures for releases of dangerous waste and dangerous waste constituents, which threaten human health and environment. WAC 173-303-040 defines a contingency plan as the document setting out an organized, planned coordinated course of action to be followed in the case of fire, explosion or release of dangerous waste or dangerous waste constituents that could threaten human health or environment. WAC 173-303-350 likewise provides that the contingency plan and emergency procedures are to lessen the potential impact on public health and the environment in the event of an emergency circumstance, including a fire, explosion, or unplanned sudden or nonsudden release of dangerous waste or dangerous waste constituents to air, soil, surface water, or ground water by a facility. If an emergency plan already exists, a facility can incorporate dangerous waste management provisions sufficient to comply with WAC 173-303-350 and -360. The Hanford Emergency Response Plan incorporates the dangerous waste management provisions to comply with WAC 173-303-350 and -360; however, it also contains other response actions unrelated to a release of dangerous waste or dangerous waste constituents that could threaten human health or environment. Incidents not requiring the implementation of the contingency plan at the Hanford Facility (e.g. security incidents) are not subject to this permit condition. The permit condition should mandate use of the contingency plan and emergency procedures in accordance with the regulatory requirement. That is, as defined in WAC 173-303-040 and WAC 173-303-350, including fire, explosion, or unplanned sudden or unsudden release of dangerous waste or nondangerous waste constituent that threatens human health or the environment. The revised wording at the end of the sentence reflects the types of incident that require the implementation of the contingency plan at a permitted facility, as given in WAC 173-303-040 and WAC 173-303-350.

Comments on General Conditions

3. **Condition II.A.2:** “The Permittees shall comply with the requirements of WAC 173-303-350(4), as provided in the Hanford Emergency Response Plan as provided in Attachment 4. The Hanford Emergency Response Plan contains reference to unit-specific contingency plans included in Part III of this Permit.”

Requested Action: Delete the second sentence of this Condition.

Comment Justification: With the integration of the Hanford Emergency Response Plan with formerly utilized RCRA-specific documentation, the reference to unit-specific contingency plans has been rendered obsolete. While unit-specific portions of *the Hanford Facility Dangerous Waste Permit Application* will continue to contain unit-specific information, there is only one contingency plan at the Hanford Facility that is composed of several parts. The Hanford Emergency Response Plan does not reference unit-specific information.

4. **Condition II.A.3:** The Permittees shall review and amend, if necessary, the Hanford Emergency Response Plan, as provided in Permit Attachment 4, pursuant to WAC 173-303-350(5) and in accordance with the provisions of WAC 173-303-830(4). The Plan shall be amended within a period of time agreed upon by the Department

Requested Action: Revise the first sentence and add a new second sentence to read: The Permittees shall review and amend, if necessary, the enforceable portions of Hanford Emergency Response Plan, as provided in Attachment 4, pursuant to WAC 173-303-350(5) and in accordance with the provisions of WAC 173-303-830(4). The Permittees shall be able to demonstrate how amendments to the enforceable portions are controlled. The plan shall be amended within a period of time agreed upon by the Department

Comment Justification: This change relates to the comment, which recommends a change to the way the Hanford Facility Response Plan is identified in Attachment 4. This change establishes that only portions of the Hanford Emergency Response Plan are enforceable, which is not evident in the proposed condition. Second, the new sentence establishes a need for the Permittees to be able to demonstrate to a Departmental inspector that the enforceable sections have not been changed without going through the permit modification process. With these changes the Permittees believe that the changes proposed to the way the Hanford Emergency Response Plan is called out in Attachment 4 would be acceptable to the Department.

5. **Condition II.A.4:** The Permittees shall comply with the requirements of WAC 173-303-350(3) and -360(1) concerning the emergency coordinator, except the names and home telephone numbers will be on file with the single point-of-contact, phone number (509) 373-3800 or 375-2400 as described in the Hanford Emergency Response Plan.

Requested Action: Revise this condition to delete the last phrase of the condition. The Permittees shall comply with the requirements of WAC 173-303-350(3) and -360(1) concerning the emergency coordinator, except the names and home telephone numbers will be on file with the single point-of-contact, phone number (509) 373-3800 or 375-2400.

Comment Justification: With the integration of the Hanford Facility Contingency Plan and the Hanford Emergency Response Plan, the text which described how names and home telephone numbers are maintained at the single point-of-contact was not carried over into the integrated plan. The text used to be found in Section 5 of the Hanford Facility Contingency Plan. The requested change accurately reflects the information in the Hanford Emergency Response Plan.

Comments on General Conditions

6. **Condition II.B.1:** "The Permittees shall equip the Facility with the equipment specified in the Hanford Emergency Response Plan (Attachment 4) pursuant to WAC 173-303-340(1). Unit-specific preparedness and prevention provisions are included in Parts III, V, and/or VI of this Permit."

Requested Action: Revise the first sentence of this condition to read: "The Permittees shall equip the Facility with the equipment specified in WAC 173-303-340(1), as specified in the Hanford Emergency Response Plan (Attachment 4)."

Comment Justification: The Hanford Emergency Response Plan contains a number of protective equipment and response equipment requirements in order to address numerous types of emergencies on the Hanford Site. The permit condition should clarify that the permit requirement only extends to those types of equipment described in WAC 173-303-340(1), *Preparedness and Prevention, Required Equipment*.

7. **Condition II.I.1.e.:** "(The Facility Operating Record shall include, but not be limited to, the following information:) Hanford Emergency Response Plan as well as summary reports and details of all incidents that require implementing the Emergency Response Plan, as specified in WAC 173-303-360(2)(k);"

Requested Action: Revise this condition to read: "Hanford Emergency Response Plan as well as summary reports concerning only those incidents which require implementing a contingency plan, as specified in WAC 173-303-360(2)(k);"

Comment Justification: The Hanford Emergency Response Plan, being a larger scope document, may be implemented for numerous reasons, including some which are not required by WAC 173-303-360(2)(k), *Emergencies, Emergency Procedures*, or other Ecology regulation. Information on such incidents should not be kept in the Facility Operating Record, as it will be burdensome to maintain and will interfere with properly retaining and archiving of the records required by the Dangerous Waste Regulations and the Permit.

Comments on Chapter 1
616 Nonradioactive Dangerous Waste Storage Facility (616 NRDWSF)

1. **Condition III.1.B.e.:** Table 7-1, Sections 3.1, 4.0 (first paragraph), 8.2, 8.3, 8.4, 11.0, and 12.0 are added as enforceable portions of Appendix 7A.
Requested Action: Accept. However, please indicate how these referenced sections are to be included in Table 7-1.
Comment Justification: This information is necessary so the RL/contractors can modify the text accordingly during future modifications to the Permit.
2. **Condition III.1.B.m.:** The Permittee must note in the 616 NRDWSF operating record the time, date, and details of any incident that requires implementing the contingency plan. Within fifteen (15) days after the incident, the permittee must submit a written report on the incident to the Department. The report must at a minimum include:
 - (1) Name, address, and telephone number of the permittee;
 - (2) Name and telephone number of the Unit;
 - (3) Date, time, and type of incident;
 - (4) Name and quantity of material(s) involved;
 - (5) Extent of injuries;
 - (6) An assessment of actual or potential hazards to human health or the environment, where this is applicable;
 - (7) Estimated quantity and disposition of recovered material that resulted from the incident;
 - (8) Cause of the incident; and
 - (9) Description of corrective actions taken to prevent reoccurrence of the incident.**Requested Action:** Accept. However, this condition should be deleted.
Comment Justification: This condition is redundant to Condition II.I.1.e.
3. **Condition III.1.B.n.:** The approved Waste Analysis Plan (WAP) is compliant for receipt of on-site waste and off-site waste from USDOE owned and operated units (i.e., 300 Area, 712 Building, and the Federal Building). The permittee is not to receive other off-site waste at this unit until the WAP has been revised to include waste acceptance/verification criteria for the receipt of off-site waste.
Requested Action: Accept. However, reword the condition to delete "300 Area".
Comment Justification: This condition should have referenced the 3000 Area of the Hanford Facility instead of the 300 Area. The 3000 Area is one of the off-site owned and operated units managed by RL/FDH, while the 300 Area is part of the contiguous Hanford Facility (onsite). However, the Form 2, permit application has been withdrawn for the 3000 Area, since the 3000 Area no longer generates waste. RL has transferred this land to the Port of Benton.

Comments on Chapter 4
Liquid Effluent Retention Facility/200 Area Effluent Treatment Facility

1. **Condition III.4.B.d.3.:** Table 7-1, Sections 3.1, 4.0 (first paragraph), 8.2, 8.3, 8.4, 11.0, and 12.0 are added as enforceable portions of Appendix 7A.

Requested Action: Accept. However, please indicate how these referenced sections are to be included in Table 7-1.

Comment Justification: This information is necessary so the RL/contractors can modify the text accordingly during future modifications to the Permit.

**Comments on Chapter 5
242-A Evaporator (242-A)**

1. **Condition III.5.B.a.14:** Table 7-1, Sections 3.1, 4.0 (first paragraph), 8.2, 8.3, 8.4, 11.0, and 12.0 are added as enforceable portions of Appendix 7A.

Requested Action: Accept. However, please indicate how these referenced sections are to be included in Table 7-1.

Comment Justification: This information is necessary so the RL/contractors can modify the text accordingly during future modifications to the Permit.

**Comments on Chapter 6
325 Hazardous Waste Treatment Units**

1. **Condition III.6.B.y:** “Chapter 7.0, Page 7-1, add “However, the Department shall be notified of all changes to the Contingency Plan within ten (10) days of implementation.”

Requested Action: Delete this condition.

Comment Justification: This condition creates redundant paperwork, increases operation expenses and is unnecessary. The contingency plan for the 325 HWTUs has already been incorporated into the permit as enforceable. Matrix (location) indicates what portions of the Hanford Emergency Response Plan have incorporated the relevant contingency plan requirements from WAC 173-303-350 and emergency provisions from WAC 173-303-360. Because the contingency plan is included in the permit, any change to those sections dealing with the contingency plan is already managed pursuant to Permit condition I.C.3, which provides for Ecology notification.

**Comments on Chapter 7
Waste Receiving and Processing Facility (WRAP)**

1. **Condition III.7.A.:** Section 2.1 Description of Waste Receiving and Processing Facility
Requested Action: Accept. However, suggest revising "Section 2.1 Description of Waste Receiving and Processing Facility" to "Section 2.2 Topographic Map".
Comment Justification: This proposed change would make enforceable Chapter 2 portions consistent with Section B of *Dangerous Waste Permit Application Requirements*, #95-402, June 1996. In Section B, the only enforceable Chapter 2 item is the Topographic Map.
2. **Condition III.7.A.:** Appendix 7A Building Emergency Plan
Requested Action: Accept. However, suggest revising "Appendix 7A Building Emergency Plan" to "Appendix 7A Building Emergency Plan (as applicable in Chapter 7)".
Comment Justification: Inclusion of this wording will be consistent with III.8.A. for the Central Waste Complex, and with agreements reached during the building emergency plan negotiations among Ecology, RL, and the contractors.
Chapter 2
3. **Condition III.7.B.a.7:** Footnote #3 on Page 2-3, delete ". . . and does not refer to noncompliance with WAC 173-303" and replace with "and/or waste that is not compliant with WAC 1173-303."
Requested Action: Accept, However, change regulatory designation from "1173-303" to "173-303."
Comment Justification: Typographic error
Appendix 3A
4. **Condition III.7.B.c.27.:** Add the following text to Section 2.2.2: "Selection and interpretation of the appropriate physical screening method(s) are conducted by personnel who are qualified as described in the Training Plan (Appendix 8A) as amended by any Permit conditions. Each physical screening method is performed by qualified personnel."
Requested Action: Accept. However, the condition should be deleted.
Comment Justification: This condition is redundant to the requirements of WAC 173-303-330 and Condition II.C.
5. **Condition III.7.B.c.34.:** Delete the text on page 2-7, line 16, and replace with the following text: "Selection and interpretation of the appropriate chemical screening method(s) are conducted by personnel who are qualified as described in the Training Plan (Appendix 8A) as amended by any permit conditions. Each chemical screening method is performed by qualified personnel."
Requested Action: Accept. However, the condition should be deleted.
Comment Justification: This condition is redundant to the requirements of WAC 173-303-330 and Condition II.C.
6. **Condition III.7.B.c.76.:** Delete the phrase "or copies of logs are maintained by the appropriate personnel after completion of sampling activities" in line 24 on page 4-2 and replace it with the following: "are permanent records of the TSD unit and must be retained in the TSD unit operating record."
Requested Action: Accept. However, line 24 referenced in this permit condition should be line 23.
Comment Justification: Typographic error.

**Comments on Chapter 7
Waste Receiving and Processing Facility (WRAP)**

7. **Condition III.7.B.c.81.:** Delete the text in lines 4 through 12 on page 6-1 and replace it with the following: "The frequency to re-evaluate the waste profile and supporting data and documentation is each twelve (12) months, at a minimum, or more often if the generator has informed the TSD unit of a change in the waste generation process or if the TSD unit has identified that the waste received at the TSD unit or the description on the manifest or shipping papers does not match the waste profile. If the generator has informed the TSD unit of a change in the waste generation process, the waste re-enters the waste stream approval process described in Section 2.1.1. as amended by any Permit conditions. The TSD unit will evaluate verification data against the waste profile to identify any waste streams for which a change in waste generation process is suspect. If a waste stream is suspect, that waste stream also will re-enter the approval process described in Section 2.1.1 as amended by any Permit condition."
- Requested Action:** Accept. However, suggest revising "the TSD unit" to "WRAP operating organization."
- Comment Justification:** The TSD unit being discussed is WRAP and should be referred to.
8. **Condition III.7.B.c.82.:** Delete the sentence in lines 10 and 11 on page 7-1, beginning with "Differences include . . ." and replace it with the following text: "Differences include, but are not limited to, the following: (1) physical and chemical screening frequencies for verification (minimum percentages of 5% for waste from on-site generators and 10% for waste from off-site generators (note that chemical screening frequency is dependent upon the physical screening frequency), (2) shipping documentation (Uniform Hazardous Waste Manifests are used for waste from off-site generators and waste tracking forms are used for waste from on-site generators), and (3) LDR documentation requirements (notification for waste from off-site generators and the information contained in the notice for waste from on-site generators)."
- Requested Action:** Accept. However, replace the phrase "from on-site generators" with "generated onsite" in all three places where it appears.
- Comment Justification:** Since RL is the only generator on the Hanford Facility, it is inappropriate to the use the term "on-site generators." The change relating to onsite verification rate of 5% is intended to be consistent with the agreement reached April 2, 1997 "Verification Requirements for Solid Waste WAP Guidance."
9. **Condition III.7.B.f.3.:** Table 7-1. The first paragraph of Section 4.0, and all of the following Sections, are added as applicable sections of Appendix 7A: Sections 3.1, 8.2, 8.3, 8.4, 11.0, and 12.0.
- Requested Action:** Accept. However, please indicate how these referenced sections are to be included in Table 7-1 and identify which of these sections are to become enforceable.
- Comment Justification:** This information is necessary so the RL/contractors can modify the text accordingly during future modifications to the Permit.
10. **Condition III.7.B.g.9.:** On Page 25, Section 7.5.3, second Paragraph, after "affected WRAP," insert "building(s)."
- Requested Action:** Accept. However, in addition, revise permit condition from "building(s)" to "area."
- Comment Justification:** If a suspicious object were located outside the WRAP building(s), personnel would not evacuate, which would jeopardize the safety of personnel, but would take cover inside the building(s).

**Comments on Chapter 7
Waste Receiving and Processing Facility (WRAP)**

11. **Condition III.7.B.g.16.:** The Permittee must note in the WRAP operating record the time, date, and details of any incident that requires implementing the Contingency Plan. Within fifteen (15) days after the incident, the permittee must submit a written report to the Department. The report must, at a minimum, include:
- Name, address, and telephone number of the permittee;
 - Name and telephone number of the Unit;
 - Date, time, and type of incident;
 - Name and quantity of material(s) involved;
 - Extent of injuries;
 - An assessment of actual or potential hazards to human health or the environment, where this is applicable;
 - Estimated quantity and disposition of recovered material that resulted from the incident;
 - Cause of the incident; and
 - Description of corrective actions taken to prevent reoccurrence of the incident.
- Requested Action:** Accept. However, this condition should be deleted.
- Comment Justification:** This condition is redundant to Condition II.I.I.e.

**Comments on Chapter 8
Central Waste Complex (CWC)**

Chapter 3.0

1. **Condition III.8.B.b.1.:** Delete “stored” on line 5 of page 3-1, replace with “managed.”
Requested Action: Accept. However, the condition should be reworded to state: Delete “stored and treated” on line 5 of page 3-1, replace with “managed.”
Comment Justification: Treatment, along with storage, is part of the waste management process at the CWC.
 2. **Condition III.8.B.b.2.:** Delete “storage” on line 5 of page 3-1, replace with “management.”
Requested Action: Accept. However, the condition should be reworded to state: Delete “storage and treatment” on line 6 of page 3-1, replace with “management.”
Comment Justification: Refer to comment justification for Condition III.8.B.b.1. The word “storage” is on Line 6, not line 5.
 3. **Condition III.8.B.b.3.:** Delete “normally” on line 11 of page 3-1.
Requested Action: Accept. However, change condition to reference line 12 instead of Line 11.
Comment Justification: The word “normally” is on line 12, not line 11.
- Appendix 3A**
4. **Condition III.8.B.c.23.:** Add the following text to Section 2.2.2: “Selection and interpretation of the appropriate physical screening method(s) are conducted by personnel who are qualified as described in the Training Plan (Appendix 8A) as amended by any Permit conditions. Each physical screening method is performed by qualified personnel.”
Requested Action: Accept. However, the condition should be deleted.
Comment Justification: This condition is redundant to the requirements of WAC 173-303-330 and Condition II.C.
 5. **Condition III.8.B.c.28.:** Delete “or Pacific Northwest National Laboratory (PNNL) packaged waste that is transferred to PNNL operated TSD units” on page 2-6, line 45, and page 2-7 line 1.
Requested Action: Accept. However, correct the page and line numbers identified.
Comment Justification: The referenced text is located on page 2-6, line 48 and page 2-7, line 1.
 6. **Condition III.8.B.c.30.:** Delete the text on page 2-7, line 12, and replace with the following text: “Selection and interpretation of the appropriate chemical screening method(s) are conducted by personnel who are qualified as described in the Training Plan (Appendix 8A) as amended by any Permit conditions. Each chemical screening method is performed by qualified personnel.”
Requested Action: Accept. However, the condition should be deleted.
Comment Justification: This condition is redundant to the requirements of WAC 173-303-330 and Condition II.C.

**Comments on Chapter 8
Central Waste Complex (CWC)**

7. **Condition III.8.B.c.77.:** Delete the text in lines 4 through 12 on page 6-1 and replace it with the following: "The frequency to re-evaluate the waste profile and supporting data and documentation is each twelve (12) months, at a minimum, or more often if the generator has informed the TSD unit of a change in the waste generation process or if the TSD unit has identified that the waste received at the TSD unit or the description on the manifest or shipping papers does not match the waste profile. If the generator has informed the TSD unit of a change in the waste generation process, the waste re-enters the waste stream approval process described in Section 2.1.1 as amended by any Permit conditions. The TSD unit will evaluate verification data against the waste profile to identify any waste streams for which a change in waste generation process is suspect. If a waste stream is suspect, that waste stream also will re-enter the approval process described in Section 2.1.1 as amended by any Permit condition."

Requested Action: Accept. However, suggest revising "the TSD unit" to "CWC operating organization".

Comment Justification: The TSD unit being discussed is CWC and should be referred to.

8. **Condition III.8.B.c.78.:** Delete the sentence in lines 10 and 11 on page 7-1, beginning with "Differences include . . ." and replace with the following: "Differences include, but are not limited to, the following: (1) physical and chemical screening frequencies for verification (minimum percentages of 5% for waste from on-site generators and 10% for waste from off-site generators (note that chemical screening frequency is dependent upon the physical screening frequency); (2) shipping documentation (Uniform Hazardous Waste Manifests are used for waste from off-site generators and waste tracking forms are used for waste from on-site generators); and (3) LDR documentation requirements (notification for waste from off-site generators and the information contained in the notice for waste from on-site generators)."

Requested Action: Accept. However, replace the phrase "from on-site generators" with "generated onsite" in all three places where it appears.

Comment Justification: Since RL is the only generator on the Hanford Facility, it is inappropriate to use the term "on-site generators." The change relating to onsite verification rate of 5% is intended to be consistent with the agreement reached April 2, 1997 "Verification Requirements for Solid Waste WAP Guidance."

Chapter 7.0

9. **Condition III.8.B.e.2.:** Table 7-1. The first paragraph of Section 4.0, and all of the following Sections, are added
as applicable sections of Appendix 7A: Sections 3.1, 8.2, 8.3, 8.4, 11.0, and 12.0.

Requested Action: Accept. However, please indicate how these referenced sections are to be included in Table 7-1 and identify which of these sections are to become enforceable.

Comment Justification: This information is necessary so the RL/Contractors can modify the text accordingly during future modifications to the Permit.

**Comments on Chapter 8
Central Waste Complex (CWC)**

Appendix 7

10. **Condition III.8.B.f.3.:** The Permittee must note in the CWC operating record the time, date, and details of any incident that requires implementing the Contingency Plan. Within fifteen (15) days after the incident, the permittee must submit a written report to the Department. The report must, at a minimum, include:
- (1) Name, address, and telephone number of the permittee;
 - (2) Name and telephone number of the Unit;
 - (3) Date, time, and type of incident;
 - (4) Name and quantity of material(s) involved;
 - (5) Extent of injuries;
 - (6) An assessment of actual or potential hazards to human health or the environment, where this is applicable;
 - (7) Estimated quantity and disposition of recovered material that resulted from the incident;
 - (8) Cause of the incident; and
 - (9) Description of corrective actions taken to prevent reoccurrence of the incident.

Requested Action: Accept. However, this condition should be deleted.

Comment Justification: This condition is redundant to Condition II.I.1.e.

Appendix 8A

11. **Condition III.8.B.h.1.:** On Page 1, Section 4.0, insert the following text; "A Facility Manager for the CWC operating organization must ensure that personnel performing the various TSD unit and TSD unit-related activities have received appropriate on-the-job training (OJT). The OJT must be provided by an individual proficient in the specific activity or activities. That individual must sign-off that personnel who successfully complete the OJT are proficient before personnel may be assigned to perform the activity independently (i.e., without close supervision)."

Requested Action: Accept. However, add after the word "proficient" "and/or knowledgeable".

Comment Justification: N/A