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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

3100 Port of Benton Blvd • Richland, WA 99352 • (509) 372-7950

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August 12, 2004

Mr. Joel B. Hebdon, Director
Regulatory Compliance and Analysis Division
United States Department of Energy
P.O. Box 550, MSIN: A5-15
Richland, Washington 99352

Mr. Thomas E. Logan, President
Bechtel Hanford, Inc.
3070 George Washington Way, MSIN: H9-04
Richland, Washington 99352

Mr. Roy J. Schepens, Manager
Office of River Protection
United States Department of Energy
P.O. Box 450, MSIN: H6-60
Richland, Washington 99352

Mr. J.P. Henschel, Project Director
Bechtel National, Inc.
2435 Stevens Center Place
Richland, Washington 99352

Mr. Keith A. Klein, Manager
Richland Operations Office
United States Department of Energy
P.O. Box 550, MSIN: A7-50
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Mr. Roby D. Enge, Director
Environment, Safety, Health and Quality
Pacific Northwest National Lab.
P.O. Box 999, MSIN: J2-38
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Mr. Richard H. Gurske, Director
Environmental Protection
Fluor Hanford, Inc.
P.O. Box 1000, MSIN: H8-12
Richland, Washington 99352

Ms. Susan J. Eberlein, Vice President
Environmental, Safety, Health and Quality
CH2M Hill Hanford Group, Inc.
P.O. Box 1500, MSIN: H6-03
Richland, Washington 99352

Dear Ms. Eberlein and Messrs. Hebdon, Schepens, Klein, Gurske, Logan, Henschel, and Enge:

Re: Ecology Letter Dated July 19, 2004, "Quarterly Notification of Class 1
Modifications to the Hanford Facility Resource Conservation and Recovery
Act (RCRA) Permit, Dangerous Waste Portion, (Quarter ending
December 31, 2003-Permit Condition I.C.3)

62222

Enclosed are Modification Notification Forms indicating those modifications that the Washington State Department of Ecology (Ecology) has re-evaluated and reversed the original assessment of denied to approved for the referenced quarterly Class 1 Modifications. Ecology wishes to submit this letter to correct errors, identified for the following units, based on agreements previous to the issuance of the approval/denial letter referenced above.



Ms. Eberlein and Messrs. Hebdon, Schepens, Klein, Gurske, Logan, Henschel, and Enge
August 12, 2004
Page 2

Liquid Effluent Retention Facility and 200 Area ETF, Attachment 34

Chapter 3.0:

Section 3.6.1.3: Ecology re-evaluated and accepted 7/27/04.

Chapter 6.0:

Section 6.1, and 6.1.1.1: Ecology re-evaluated and accepted 7/27/04.

Section 6.1.1.1: Ecology re-evaluated and accepted 7/27/04.

Chapter 7.0:

Section 7.4.4: Ecology re-evaluated and accepted 7/27/04.

Chapter 11.0:

Section 11.2.4: Ecology re-evaluated and accepted 7/24/04.

242-A Evaporator, Attachment 35

Chapter 4.0:

Section 4.1.12: Ecology re-evaluated and accepted 7/27/04.

Chapter 6.0:

Section 6.1: Ecology re-evaluated and accepted 7/27/04, contingent upon Ecology's understanding that reference to 6.1 encompasses 6.1, 6.1.1, and 6.2.

325 HWTU, Attachment 36

Chapter 3.0:

Section 3.4.1.1: Ecology re-evaluated and accepted 8/3/04.

Section 3.4.2: Ecology re-evaluated and accepted 8/3/04.

Section 3.9: Ecology re-evaluated and accepted 8/3/04.

Chapter 4.0:

Section 4.2.2.2.1: Ecology re-evaluated and denied 8/3/04. Liquid in the annulus is an important indicator.

Section 4.2.1: Original denied on 7/19/04. Fast Track denied on 7/19/04. Fast Track re-evaluated and accepted 8/3/04.

Chapter 6.0

Section 6.4.5: Ecology re-evaluated and accepted 8/3/04. To be consistent with other contractors.

305-B Storage Facility, Attachment 18

Chapter 2.0:

Section 2.2.1: Ecology re-evaluated and accepted 8/3/04.

Figure 2.3: Ecology re-evaluated and accepted 8/3/04.

Purex Storage Tunnels, Attachment 28

Chapter 4.0:

Section 6.1 and 6.1.1.1: Ecology re-evaluated and accepted 8/3/04. Contingent upon Ecology's understanding that reference to 6.1 encompasses 6.1, 6.1.1, and 6.2.

Ms. Eberlein and Messrs. Hebdon, Schepens, Klein, Gurske, Logan, Henschel, and Enge
August 12, 2004
Page 3

Again, the United States Department of Energy and contractor staff are encouraged to discuss proposed Class 1 changes with Ecology's unit managers to clarify any questions or concerns. If you have any questions or comments regarding this letter, please contact me at (509) 372-7894.

Sincerely,



Greta P. Davis
Hanford Sitewide RCRA Permit Coordinator
Nuclear Waste Program

GD:nc
Enclosures

cc w/enc: Anthony (Tony) McKarns, USDOE
Mike Hughes, BHI
Roger Landon, BHI
Suzette Thompson, FH
Phil Miller, CH2M
Alice Ikenberry, PNNL
Stuart Harris, CTUIR
Pat Sobotta, NPT
Russell Jim, YN
Ken Niles, ODOE
Administrative Record
Environmental Portal

cc w/o enc: Ro Vinson, PEC
Rick Gay, CTUIR
Todd Martin, HAB

Hanford Facility RCRA Permit Modification Notification Form

Unit: Liquid Effluent Retention Facility & 200 Area Effluent Treatment Facility	Permit Part & Chapter: Part III, Chapter 4 and Attachment 34
---------------------------------------------------------------------------------------------------	------------------------------------------------------------------------

Description of Modification:

Chapter 3.0, §3.6.1.3: remove and replace Chapter 3.0 with attached Chapter 3.0.

3.6.1.3 Sampling Frequency

ETF secondary waste is sampled at a frequency of two containers per batch. A batch is defined as any volume of aqueous waste that is being treated under consistent and constant process conditions. The secondary waste will be resampled under the following changes in process conditions:

- Change in an influent source (e.g., change in well-head)
- Change in process chemistry.

Up to a maximum of three representative samples will be collected from the concentrate tanks, if waste from the concentrate tanks is used for characterization of a batch of influent waste. These samples will be analyzed for the appropriate parameters identified in Table 3.5 based on the needs identified from evaluating influent sampling and analysis data. When ~~personnel radiological and/or chemical~~ exposures are of concern, analytical results from concentrate tank samples will be used to represent the powder waste generated from the treatment of that aqueous waste(s). The dry powder or concentrate tanks will be re-sampled in the following situations:

- The LERF and ETF management have been notified, or have reason to believe that the process generating the waste has changed (for example, a source change such as a change in the well-head for groundwater that significantly changes the aqueous waste characterization).

The LERF and ETF management note an increase or decrease in the concentration of a constituent in an aqueous waste stream, beyond the range of concentrations that was described or predicted in the waste characterization.

*Previously denied 7/19/04
Re-evaluated & accepted 1/27/04*

Modification Class: ¹²³	Class 1	Class ¹ 1	Class 2	Class 3
Please check one of the Classes:	X			

Relevant WAC 173-303-830, Appendix I Modification: A.1.

Enter wording of the modification from WAC 173-303-830, Appendix I citation

A. General Permit Provisions

1. Administrative and informational changes.

Submitted by Co-Operator: <i>R. Wilde</i>	Reviewed by RL Program Office: <i>M. S. McCormick</i>	Reviewed by Ecology: <i>F. Jamison</i>	Reviewed by Ecology: <i>E. R. Skinnarland</i>
R. T. Wilde	M. S. McCormick	F. Jamison	E. R. Skinnarland
Date	Date	Date	Date

12/18/03

¹ Class 1 modifications requiring prior Agency approval.

² This is only an advanced notification of an intended Class ¹1, 2, or 3 modification, this should be followed with a formal modification request, and consequently implement the required Public Involvement processes when required.

³ If the proposed modification does not match any modification listed in WAC 173-303-830 Appendix I, then the proposed modification should automatically be given a Class 3 status. This status may be maintained by the Department of Ecology, or down graded to ¹1, if appropriate.

Hanford Facility RCRA Permit Modification Notification Form

Unit: Liquid Effluent Retention Facility & 200 Area Effluent Treatment Facility	Permit Part & Chapter: Part III, Chapter 4 and Attachment 34
--------------------------------------------------------------------------------------------------------------------	------------------------------------------------------------------------

Description of Modification:

Chapter 6.0, §6.1, and 6.1.1.1: remove and replace Chapter 6.0 with attached Chapter 6.0.

6.1 SECURITY [F-1]

The following sections describe the security measures, equipment, and warning signs used to control entry to LERF and ETF. Hanford Facility security measures are discussed in Attachment 33, § 6.1, General Information Portion (DOE/RL-91-28).

...

6.1.1.1 24-Hour Surveillance System

The entire Hanford Facility is a controlled-access area. For surveillance information, refer to Attachment 33, § 6.1, General Information Portion (DOE/RL-91-28).

*previously denied 7/19/04
 Re-evaluated & accepted 7/27/04*

Modification Class: ¹²³ Please check one of the Classes:	Class 1	Class ¹ 1	Class 2	Class 3
	X			

Relevant WAC 173-303-830, Appendix I Modification: A.1.

Enter wording of the modification from WAC 173-303-830, Appendix I citation
 A. General Permit Provisions
 I. Administrative and informational changes.

Submitted by Co-Operator: <i>R.T. Wilde</i> 12/12/03 R. T. Wilde Date	Reviewed by RL Program-Office: <i>M.S. McCormick</i> 12/18/03 M. S. McCormick Date	Reviewed by Ecology: <i>F. Jamison</i> 7/27/04 F. Jamison Date	Reviewed by Ecology: <i>E.R. Skinnarland</i> 7/27/04 E. R. Skinnarland Date
-----------------------------------------------------------------------------	------------------------------------------------------------------------------------------	----------------------------------------------------------------------	-----------------------------------------------------------------------------------

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Hanford Facility RCRA Permit Modification Notification Form

Unit: Liquid Effluent Retention Facility & 200 Area Effluent Treatment Facility	Permit Part & Chapter: Part III, Chapter 4 and Attachment 34
---------------------------------------------------------------------------------------------------	------------------------------------------------------------------------

Description of Modification:

Chapter 7.0, §7.4.4: remove and replace Chapter 7.0 with attached Chapter 7.0.

7.4.4 Personal Protective Equipment

Self contained breathing apparatus (SCBA)	4 – 2025E Rm 116	Breathable air for initial response to emergency, and recovery activities when required for radiological protection.
Acid suits	3 each included in the spill response cabinets in 2025E	Chemical protection for personnel during containment and isolation.
Respirators	2025E Rm 107A	Filtered air for recovery of known hazards.

*previously denied 7/19/04
Re-evaluated & accepted 7/27/04*

Modification Class: ¹²³	Class 1	Class ¹ 1	Class 2	Class 3
Please check one of the Classes:	X			

Relevant WAC 173-303-830, Appendix I Modification: A.1.

Enter wording of the modification from WAC 173-303-830, Appendix I citation

- A. General Permit Provisions
1. Administrative and informational changes.

Submitted by Co-Operator: <i>R.T. Wilde</i> 12/18/03	Reviewed by RL Program Office: <i>M.S. McCormick</i>	Reviewed by Ecology: <i>G.P. Davis</i> 7/27/04	Reviewed by Ecology: <i>G.P. Davis</i> 7/27/04
R. T. Wilde Date	M. S. McCormick Date	F. Jamison Date	E. R. Skinnerland Date

12/18/03

¹ Class 1 modifications requiring prior Agency approval.
² This is only an advanced notification of an intended Class ¹1, 2, or 3 modification, this should be followed with a formal modification request, and consequently implement the required Public Involvement processes when required.
³ If the proposed modification does not match any modification listed in WAC 173-303-830 Appendix I, then the proposed modification should automatically be given a Class 3 status. This status may be maintained by the Department of Ecology, or down graded to ¹1, if appropriate.

Hanford Facility RCRA Permit Modification Notification Form

Unit: Liquid Effluent Retention Facility & 200 Area Effluent Treatment Facility	Permit Part & Chapter: Part III, Chapter 4 and Attachment 34
---------------------------------------------------------------------------------------------------	------------------------------------------------------------------------

Description of Modification:

Chapter 11.0, §11.2.4: remove and replace Chapter 11.0 with attached Chapter 11.0.

11.2.4 Closure Standards for Underlying Soils

The LERF retention basins have a leachate collection system for leaks or spills that channels the liquid to drains or sumps. The collected liquid is pumped back into the basins, thereby preventing spills from reaching the soil. The soil only could be contaminated if the secondary liner had failed. To determine if failure occurred, the primary liner will be inspected for leaks, holes, or punctures and the drainage gravel and bentonite carpet liner underneath the primary liner will be sampled and analyzed for contamination. If the drainage gravel analytical results determine that the constituents of concern are at or below agreed to regulatory cleanup levels (i.e., Hanford Site soil background levels (DOE-RL 1993) and/or residential exposure assumptions according to the Model Toxics Control Act), the gravel will be considered clean for closure. Only if contamination is found in the drainage gravel/bentonite carpet liner will the secondary liner surfaces be inspected for leaks, holes, or punctures, which (if existing) could have provided a pathway to soil for contamination (refer to Chapter 4.0, Figure 4-3 for basin diagram). If no leaks, holes, or punctures are found in the primary liner or if the drainage gravel/bentonite carpet liner is found not to be contaminated, the soil will be considered to be clean closed. However, if leaks, holes, or punctures are found in the primary liner or the gravel is contaminated, the secondary liner surfaces will be inspected. If no leaks, holes, or punctures are found in the secondary liner surfaces, the soil will be considered clean closed. If such leaks, holes, or punctures are identified, potential soil contamination will be investigated. Soil will be sampled and analyzed for constituents of concern. If the soil analytical results determine that the constituents of concern are at or below agreed to regulatory cleanup levels, the soil will be considered clean closed.

Clean closure of soil under the ETF will be accomplished by demonstrating that the coated concrete floor kept contaminants from reaching the soil. The coated concrete floor provided secondary containment for all the tanks and process piping. Unless inspections identify potential through-thickness cracks indicating containment failure and a subsequent potential for soil contamination from TSD unit operations, the soil will be considered clean closed. However, if inspections identify such cracks and there have been documented spills in the vicinity, potential soil contamination will be investigated. Soils will be sampled and analyzed for constituents of concern. If the soil analytical results determine that the constituents of concern are at or below agreed to regulatory clean up levels, the soil will be considered clean closed. Regulatory cleanup levels are defined by the Hanford Facility RCRA Permit (Condition II.K.). If verification sampling is required, a sampling analysis plan will be prepared before closure in a manner consistent with Ecology guidance (Ecology 1994a) for achievement of clean closure.

Modification Class: ¹²³	Class 1	Class ¹ 1	Class 2	Class 3
Please check one of the Classes:	X			

Relevant WAC 173-303-830, Appendix I Modification: A.1.

Enter wording of the modification from WAC 173-303-830, Appendix I citation

- A. General Permit Provisions
 1. Administrative and informational changes.

Submitted by Co-Operator: <i>R. T. Wilde</i>	Reviewed by RL Program Office: <i>M. S. McCormick</i>	Reviewed by Ecology: <i>G. P. Davis 7/27/04</i>	Reviewed by Ecology: <i>G. P. Davis 7/27/04</i>
R. T. Wilde Date	M. S. McCormick Date	F. Jamison Date	E. R. Skinnerland Date

12/18/03

*Previously denied 7/27/04
 Re-evaluated & accepted 7/27/04*

¹ Class 1 modifications requiring prior Agency approval.

² This is only an advanced notification of an intended Class ¹1, 2, or 3 modification, this should be followed with a formal modification request, and consequently implement the required Public Involvement processes when required.

³ If the proposed modification does not match any modification listed in WAC 173-303-830 Appendix I, then the proposed modification should automatically be given a Class 3 status. This status may be maintained by the Department of Ecology, or down graded to ¹1, if appropriate.

Hanford Facility RCRA Permit Modification Notification Form

Unit:
242-A Evaporator

Permit Part & Chapter:
Part III, Chapter 5 and Attachment 35

Description of Modification:

Chapter 4.0, §4.1.12: Replace Chapter 4.0 with the attached Chapter 4.0.

4.1.12 Management of Incompatible Wastes in Tank Systems

~~Data Quality Objectives for Tank Farm Waste Compatibility Program (WHC 1995a) was established transferred to ensure that waste transferred within the DST System is 242-A Evaporator must be compatible before mixing. Waste transferred to the 242-A Evaporator also must meet these requirements. Waste compatibility with tank system construction material is discussed in Section 4.3.3 of the IAR (Attachment 35, Appendix 4B). The waste analysis plan (Attachment 35, Chapter 3.0) also includes waste compatibility requirements~~

*previously denied 7/19/04
Re-evaluated + accepted 7/27/04*

Modification Class: ¹²³	Class 1	Class ¹ 1	Class 2	Class 3
Please check one of the Classes:	X			

Relevant WAC 173-303-830, Appendix I Modification: **A.1**

Enter wording of the modification from WAC 173-303-830, Appendix I citation

- A. General Permit Provisions
1. Administrative and Informational changes

Submitted by Co-Operator:	Reviewed by DOE Program Office:	Reviewed by Ecology:	Reviewed by Ecology:
<i>E. Aromi</i> 12/12/03	<i>J. Swailes</i> 12/18/03	<i>F. Jamison</i> 7/27/04	<i>E. R. Skinnarland</i> 7/27/04
E. Aromi Date	J. Swailes Date	F. Jamison Date	E. R. Skinnarland, Date

¹ Class 1 modifications requiring prior Agency approval.

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³ If the proposed modification does not match any modification listed in WAC 173-303-830 Appendix I, then the proposed modification should automatically be given a Class 3 status. This status may be maintained by the Department of Ecology, or down graded to ¹1, if appropriate.

Hanford Facility RCRA Permit Modification Notification Form

Unit:
242-A Evaporator

Permit Part & Chapter:
Part III, Chapter 5 and Attachment 35

Description of Modification:

Chapter 6.0, §6.1: Replace Chapter 6.0 with the attached Chapter 6.0.

6.1 SECURITY

The following sections describe the security measures, equipment, and warning signs used to control entry to the 242-A Evaporator. Hanford Facility security measures are discussed in the Attachment 33, Chapter 6.0, §6.1, General Information Portion (DOE/RL-91-28).

...

6.1.1.1 24-hour Surveillance System

The entire Hanford Facility Site is a controlled-access area with around-the-clock access control. For surveillance information refer to Attachment 33, Chapter 2.0, §6.1.1, General Information Portion (DOE/RL-91-28).

*previously denied 7/19/04
Re-evaluated & accepted 7/27/04*

Modification Class: ¹²³	Class 1	Class ¹ 1	Class 2	Class 3
Please check one of the Classes:	X			

Relevant WAC 173-303-830, Appendix I Modification: **A.1**

Enter wording of the modification from WAC 173-303-830, Appendix I citation

A. General Permit Provisions
1. Administrative and Informational changes

Submitted by Co-Operator:	Reviewed by DOE Program Office:	Reviewed by Ecology:	Reviewed by Ecology:
<i>E. Aromi</i> 12/12/03	<i>J. Swailes</i> 12/12/03	<i>F. Jamison</i> 7/27/04	<i>F. Jamison</i> 7/27/04
E. Aromi Date	J. Swailes Date	F. Jamison Date	F. R. Skinnarland, Date

¹ Class 1 modifications requiring prior Agency approval.

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³ If the proposed modification does not match any modification listed in WAC 173-303-830 Appendix I, then the proposed modification should automatically be given a Class 3 status. This status may be maintained by the Department of Ecology, or down graded to ¹1, if appropriate.

Hanford Facility RCRA Permit Modification Notification Form

Unit: 325 Hazardous Waste Treatment Units	Permit Part & Chapter: Part III, Chapter 6 and Attachment 36
-----------------------------------------------------	------------------------------------------------------------------------

Description of Modification:
Chapter 3.0, §3.4.1.1: Replace Chapter 3.0 with the attached Chapter 3.0.

3.4.1.1 Technical Review Process Overview

This program, administered by the 325 HWTUs personnel, is designed to obtain the waste information required pursuant to 40 CFR 264.13 and WAC 173-303-300. The review is conducted by qualified 325 HWTUs personnel using procedural guidelines and professional judgment. The reviewer(s), at their discretion, could request additional information or require additional analytical data before determining waste acceptability.

The first step in evaluating the acceptability of a waste is to obtain a general description of the wastes and to identify the waste codes and regulatory requirements that apply to the waste.

Technical review of waste information is designed to accomplish three objectives: (1) determine if the 325 HWTUs can accept the material; (2) identify special handling procedures necessary to store the material safely before and during treatment; and (3) identify treatment technologies that meet waste-minimization efforts and applicable regulatory restrictions (e.g., LDR).

The waste-stream file includes the following information submitted by the generator and any literature reviews, records of conversations, etc., completed by the reviewer:

- copies of laboratory-test results, specific information on the process that generated the waste, MSDSs, etc., used to determine the components of the waste;
- waste characteristics, including compatibility, reactivity, ignitability, and corrosivity;
- documentation of conversations that clarify omissions or discrepancies;
- copies of data from additional analytical tests requested or conducted by the 325 HWTUs personnel; and
- container information, including number of containers, volume capacity of each of the containers, and type of material.

*Previously denied 7/19/04
Re-evaluated + accepted 8/3/04*

Modification Class: ¹²³	Class 1	Class ¹ 1	Class 2	Class 3
Please check one of the Classes:	X			

Relevant WAC 173-303-830, Appendix I Modification: A.1.

Enter wording of the modification from WAC 173-303-830, Appendix I citation

- A. General Permit Provisions
1. Administrative and informational changes

Submitted by Co-Operator: <i>A. K. Ikenberry</i> A. K. Ikenberry	Reviewed by RL Program Office: <i>R. F. Christensen</i> R. F. Christensen	Reviewed by Ecology: <i>F. C. Jamison</i> F. C. Jamison	Reviewed by Ecology: <i>E. R. Skinnarland</i> E. R. Skinnarland
<i>8 Dec 03</i> Date	<i>12/11/03</i> Date	<i>8/3/04</i> Date	<i>8/3/04</i> Date

¹Class 1 modifications requiring prior Agency approval.

²This is only an advanced notification of an intended Class ¹1, 2, or 3 modification, this should be followed with a formal modification request, and consequently implement the required Public Involvement processes when required.

³If the proposed modification does not match any modification listed in WAC 173-303-830 Appendix I, then the proposed modification should automatically be given a Class 3 status. This status may be maintained by the Department of Ecology, or down graded to ¹1, if appropriate.

Hanford Facility RCRA Permit Modification Notification Form

Unit: 325 Hazardous Waste Treatment Units		Permit Part & Chapter: Part III, Chapter 6 and Attachment 36			
Description of Modification: Chapter 3.0, §3.4.2: Replace Chapter 3.0 with the attached Chapter 3.0.					
3.4.2 Verification					
...					
Exceptions to physical screening for verification are:					
<ul style="list-style-type: none"> Shielded, classified, and remote-handled dangerous-mixed waste are not required to be physically screened; however, 325 HWTUs staff must perform a more rigorous documentation review and obtain the raw data to characterize the waste (<1 percent of current waste receipts). Waste which cannot be verified at the 325 HWTUs must be verified at the generating unit (e.g., large components, containers which cannot be opened, are greater than 20 mrem/hr, contain greater than 100 nCi/g of transuranic radionuclides for ALARA reasons, or will not fit into the NDE unit). Physical screening at the customer location consists of observing packaging of the waste. 					
If no location can be found to do the physical screening, then no screening is required.					
<ul style="list-style-type: none"> Wastes which are packaged by the 325 HWTUs authorized independent agent are considered to have met the physical screening requirements (e.g., PNNL-packaged waste which is transferred to PNNL-operated TSD units). 					
A bulk-waste stream (e.g., large volumes of waste from a single generating event, such as soil remediation from a single event) may be verified by screening the allowable rate of the total number of loads throughout the waste stream.					
...					
<p><i>Previously denied 7/19/04</i> <i>Re-evaluated & accepted 8/3/04</i></p>					
Modification Class: ¹²³		Class 1	Class ¹	Class 2	Class 3
Please check one of the Classes:		X			
Relevant WAC 173-303-830, Appendix I Modification:		A.1.			
<u>Enter wording of the modification from WAC 173-303-830, Appendix I citation</u>					
A. General Permit Provisions					
1. Administrative and informational changes					
Submitted by Co-Operator:	Reviewed by RL Program Office:	Reviewed by Ecology:	Reviewed by Ecology:		
<i>A. K. Ikenberry</i> 8 Dec 03	<i>R. F. Christensen</i> 2/11/03	<i>G. P. Davis</i> 8/3/04	<i>G. P. Davis</i> 8/3/04		
A. K. Ikenberry Date	R. F. Christensen Date	F. C. Jamison Date	E. R. Skinnarland Date		

¹Class 1 modifications requiring prior Agency approval.

²This is only an advanced notification of an intended Class 1, 2, or 3 modification, this should be followed with a formal modification request, and consequently implement the required Public Involvement processes when required.

³If the proposed modification does not match any modification listed in WAC 173-303-830 Appendix I, then the proposed modification should automatically be given a Class 3 status. This status may be maintained by the Department of Ecology, or down graded to ¹, if appropriate.

Hanford Facility RCRA Permit Modification Notification Form

Unit: 325 Hazardous Waste Treatment Units		Permit Part & Chapter: Part III, Chapter 6 and Attachment 36			
Description of Modification: Chapter 3.0, §3.9: Replace Chapter 3.0 with the attached Chapter 3.0.					
3.9 SELECTING WASTE RE-EVALUATION FREQUENCIES					
...					
Exceptions to physical screening for verification are:					
<ul style="list-style-type: none"> Shielded, classified, and remote-handled <u>dangerous-mixed</u> waste are not required to be physically screened; however, 325 HWTUs staff must perform a more rigorous documentation review and obtain the raw data to characterize the waste (< 1 percent of current waste receipts). Wastes which cannot be verified at the 325 HWTUs must be verified by the generator (e.g., large components, containers which cannot be opened, are greater than 20 mrem/h, contain greater than 100 nCi/gram of transuranic radionuclides <u>for ALARA reasons</u>, or will not fit into the NDE unit). 					
Analysis and characterization, as required by WAC 173-303-300(2), are performed on each waste before acceptance at the 325 HWTUs to determine waste designation and characteristics. The characterization of the waste, based on this information, is reviewed each time a waste is accepted. The information must be updated by the generator annually or when the waste stream changes, whichever comes first, or if the following occurs.					
...					
<i>Previously denied 7/19/04 Re-evaluated & accepted 8/3/04</i>					
Modification Class: ¹²³		Class 1	Class 1	Class 2	Class 3
Please check one of the Classes:		X			
Relevant WAC 173-303-830, Appendix I Modification:		A.1.			
<u>Enter wording of the modification from WAC 173-303-830, Appendix I citation</u>					
A. General Permit Provisions					
1. Administrative and informational changes					
Submitted by Co-Operator:	Reviewed by RL Program Office:	Reviewed by Ecology:	Reviewed by Ecology:		
<i>A. K. Ikenberry</i> 8 Dec 03	<i>R. F. Christensen</i> 12/11/03	<i>F. C. Jamison</i> 8/3/04	<i>E. R. Skinnerland</i> 8/3/04		
A. K. Ikenberry Date	R. F. Christensen Date	F. C. Jamison Date	E. R. Skinnerland Date		

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³ If the proposed modification does not match any modification listed in WAC 173-303-830 Appendix I, then the proposed modification should automatically be given a Class 3 status. This status may be maintained by the Department of Ecology, or down graded to ¹, if appropriate.

Hanford Facility RCRA Permit Modification Notification Form

Unit: 325 Hazardous Waste Treatment Units	Permit Part & Chapter: Part III, Chapter 6 and Attachment 36
-----------------------------------------------------	------------------------------------------------------------------------

Description of Modification:
Chapter 4.0, §4.2.1: Replace Chapter 4.0 with the attached Chapter 4.0.

4.2.1 Shielded Analytical Laboratory Tank System

The SAL is an analytical chemistry laboratory used primarily to prepare and analyze samples of ~~dangerous waste streams for research and development activities and~~ waste characterization. As noted in Section 3.3, storage in containers and bench-or small-scale treatment of dangerous waste also occurs in the SAL. This work is conducted in six inter-connected hot cells ~~that form the nucleus of the SAL.~~ Liquid waste generated during these operations is collected, treated if necessary and drained from the hot cells to the SAL tank located in Room 32 of the basement directly below the hot cells. A stainless steel trough, 15.2 centimeters wide by 7.62 centimeters deep, traverses the front of all six hot cells in which solution is poured. The trough is equipped with stainless steel grating to capture solids during solution pour. The trough collects any liquid waste poured from analytical chemistry operations, mixed waste treatment operations, other chemical and mixed waste stored in the hot cells, and spills or leaks. The liquid waste is transferred through a common stainless steel pipeline that drains into the SAL tank. The waste is batch transferred from the SAL tank to the ~~radioactive-~~ liquid mixed waste system and into the RLWT. The SAL tank volume is 1,218 liters and has a throughput of 80,000 liters per year.

** Original denied on 7/19/04
 * Fast track denied on 7/19/04
 * Fast track re-evaluated and accepted on 8/3/04*

Modification Class: ¹²³ Please check one of the Classes:	Class 1	Class ¹ 1	Class 2	Class 3
	X			

Relevant WAC 173-303-830, Appendix I Modification: **A.1.**

Enter wording of the modification from WAC 173-303-830, Appendix I citation

A. General Permit Provisions
 1. Administrative and informational changes

Submitted by Co-Operator: <i>A. K. Ikenberry</i> 2-23-04 A. K. Ikenberry Date	Reviewed by RL Program Office: <i>R. F. Christensen</i> 2/25/09 R. F. Christensen Date	Reviewed by Ecology: <i>G. P. Davis</i> 8/3/04 F. C. Jamison Date	Reviewed by Ecology: <i>G. P. Davis</i> 8/3/04 E. R. Skinnarland Date
-------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------	-------------------------------------------------------------------------	-----------------------------------------------------------------------------

¹Class 1 modifications requiring prior Agency approval.
²This is only an advanced notification of an intended Class ¹1, 2, or 3 modification, this should be followed with a formal modification request, and consequently implement the required Public Involvement processes when required.
³If the proposed modification does not match any modification listed in WAC 173-303-830 Appendix I, then the proposed modification should

Hanford Facility RCRA Permit Modification Notification Form

Unit: 325 Hazardous Waste Treatment Units	Permit Part & Chapter: Part III, Chapter 6 and Attachment 36
-----------------------------------------------------	------------------------------------------------------------------------

Description of Modification:
Chapter 4.0, §4.2.2.2.1: Replace Chapter 4.0 with the attached Chapter 4.0.

4.2.2.2.1 Requirements for Tank Systems

The secondary containment system for the RLWT consists of the stainless steel liner in the bottom of the concrete tank pit and 0.6 meters up the tank pit walls. The remaining portion of the concrete walls is painted with a chemically resistant coating and the boundary between the steel liner and the coating is sealed.

The welded single-walled transfer piping will be visually inspected for leaks within 24 hours of a transfer. The 325 Building provides additional containment. The basement floors are concrete, and any liquid release remains in the immediate area until cleanup.

The transfer piping from the SAL tank to the RLWT is single-walled, welded stainless steel pipe. Sections of the RLWT system piping have secondary containment where feasible. Secondary containment for the piping system consists of double-walled stainless steel pipe with outlet valves at the ends. Secondary containment piping was installed on the new line from Room 40A to the RLWT. Secondary containment piping was also installed on the line between Room 528 and the RLWT and from the RLWT to the cask loading station. Any leaks in the primary piping will cause liquid to gravity flow to the area of the pipe containing the outlet valve. ~~An increase in radiological dose will be seen if liquid is collecting in the annulus.~~

Denied

** Previously accepted 7/19/04
Re-evaluated & denied 8/3/04*

Modification Class: ¹²³	Class 1	Class ¹ 1	Class 2	Class 3
Please check one of the Classes:	X			

Relevant WAC 173-303-830, Appendix I Modification: **A.I.**

Enter wording of the modification from WAC 173-303-830, Appendix I citation

A. General Permit Provisions
1. Administrative and informational changes

Submitted by Co-Operator:	Reviewed by RL Program Office:	Reviewed by Ecology:	Reviewed by Ecology:
<i>A. K. Ikenberry</i> <i>3/20/03</i>	<i>R. F. Christensen</i> <i>12/11/03</i>		
A. K. Ikenberry Date	R. F. Christensen Date	F. C. Jamison Date	E. R. Skinnarland Date

¹ Class 1 modifications requiring prior Agency approval.
² This is only an advanced notification of an intended Class ¹1, 2, or 3 modification, this should be followed with a formal modification request, and consequently implement the required Public Involvement processes when required.
³ If the proposed modification does not match any modification listed in WAC 173-303-830 Appendix I, then the proposed modification should automatically be given a Class 3 status. This status may be maintained by the Department of Ecology, or down graded to ¹1, if appropriate.

Hanford Facility RCRA Permit Modification Notification Form

Unit: 325 Hazardous Waste Treatment Units	Permit Part & Chapter: Part III, Chapter 6 and Attachment 36
-----------------------------------------------------	------------------------------------------------------------------------

Description of Modification:
 Chapter 6.0, §6.4.5: Replace Chapter 6.0 with the attached Chapter 6.0.

6.4.5 Personal Protection Equipment

Protective clothing and equipment are provided to employees during normal and emergency operations. Protection levels for emergencies are determined either in consultation with an industrial hygienist, or applicable radiological control work permits (RWP) or applicable operating procedure.

Per the identified work requirements, protective clothing and equipment is available for all staff working at the SAL. Protective clothing and equipment available at the SAL include, but are not limited to, the following:

...

RLWT System

- Laboratory coats (325 Building – Mens/womens change room)
- Shoe covers (325 Building – Mens/womens change room)
- Surgeon gloves (Control Room)
- Chemical-resistant gloves (Control Room)
- Chemical-resistant aprons (Control Room)
- Face shields (Control Room)
- Hard hats (Control Room)
- Safety glasses (Control Room).

The protective equipment storage areas are well stocked at all times. This equipment is replaced periodically as it is used. The above inventory reflects each type of personal protective equipment that typically is present at the 325 HWTUs. Additional radiological and non-radiological personal protective equipment can be obtained, as needed, from storage locations and sources outside of the 325 HWTUs. These areas include the personal protective equipment storage area in the 700 hall men's and women's change rooms, Room 529, and the men's and women's change rooms in the south end (first floor) of the 325 Building. This personal protective equipment also can be obtained from onsite suppliers for the 325 HWTUs

...

*Previously denied 7/19/04
 Re-evaluated & accepted 8/3/04*

Modification Class: ¹²³	Class 1	Class ¹ 1	Class 2	Class 3
Please check one of the Classes:	X			

Relevant WAC 173-303-830, Appendix I Modification: **A.1.**

Enter wording of the modification from WAC 173-303-830, Appendix I citation

A. General Permit Provisions
 1. Administrative and informational changes

Submitted by Co-Operator: <i>Alex Ikenberry</i> A. K. Ikenberry	Reviewed by RL Program Office: <i>R.F. Christensen</i> R. F. Christensen	Reviewed by Ecology: <i>G.P. Davis</i> F. C. Jamison	Reviewed by Ecology: <i>G.P. Davis</i> E. R. Skinnerland
Date: <i>8 Dec 03</i>	Date: <i>12/10/03</i>	Date: <i>8/3/04</i>	Date: <i>8/3/04</i>

¹Class 1 modifications requiring prior Agency approval.
² This is only an advanced notification of an intended Class ¹1, 2, or 3 modification, this should be followed with a formal modification request, and consequently implement the required Public Involvement processes when required.
³ If the proposed modification does not match any modification listed in WAC 173-303-830 Appendix I, then the proposed modification should automatically be given a Class 3 status. This status may be maintained by the Department of Ecology, or down graded to ¹1, if appropriate.

Hanford Facility RCRA Permit Modification Notification Form

Unit: 305-B Storage Facility		Permit Part & Chapter: Part III, Chapter 2 and Attachment 18			
Description of Modification:					
Chapter 2.0, Figure 2.3: Replace Chapter 2.0 with the attached Chapter 2.0.					
Delete Figure 2.3 Wind Roses for the Hanford Site.					
<i>Previously denied on 7/1/91. Ecology re-evaluated and accepted on 8/3/04.</i>					
Modification Class: ¹²³		Class 1	Class ¹	Class 2	Class 3
Please check one of the Classes:		X			
Relevant WAC 173-303-830, Appendix I Modification:		A.1.			
<u>Enter wording of the modification from WAC 173-303-830, Appendix I citation</u>					
A. General Permit Provisions					
1. Administrative and Informational changes					
Submitted by Co-Operator:	Reviewed by RL Program Office:	Reviewed by Ecology:	Reviewed by Ecology:		
<i>Alice Ikenberry</i> 8 Dec 03	<i>R.F. Christensen</i> 12/1/03	<i>F. Jamison</i> 8/3/04	<i>E. R. Skinnarland</i> 8/3/04		
A.K. Ikenberry	R.F. Christensen	F. Jamison	E. R. Skinnarland		
Date	Date	Date	Date		

¹ Class 1 modifications requiring prior Agency approval.² This is only an advanced notification of an intended Class¹, 2, or 3 modification, this should be followed with a formal modification request, and consequently implement the required Public Involvement processes when required.³ If the proposed modification does not match any modification listed in WAC 173-303-830 Appendix I, then the proposed modification should automatically be given a Class 3 status. This status may be maintained by the Department of Ecology, or down graded to¹, if appropriate.

Hanford Facility RCRA Permit Modification Notification Form

Unit: 305-B Storage Facility	Permit Part & Chapter: Part III, Chapter 2 and Attachment 18
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Description of Modification:

Chapter 2.0, §2.2.1: Replace Chapter 2.0 with the attached Chapter 2.0.

2.2.1 General Requirements [B-2a]

Attachment 33, Appendix 2AH-13-958 is a general overview provides location maps of the Hanford Site property and the surrounding countryside. This figure is intended as a location map and illustrates the following:

- The facility boundary of the Hanford Site
- Surrounding land use including the Saddle Mountain National Wildlife Refuge and the State Game Reserve to the north, the City of Richland to the south, Rattlesnake Mountain Arid Lands Ecology (ALE) Reserve located to the west, and farmlands or Game Reserves to the east
- Contours sufficient to show surface water flow
- Fire control facilities located on the Hanford Site
- Locations of access roads, internal roads, railroads, and perimeter gates and barricades
- Latitudes and longitudes.

Detailed representation of the Hanford 300A Area where the 305-B Storage Facility is located. These maps provide a detailed profile of the unit and a distance of 1,000 ft around it at a scale noted on the drawings. Contour intervals are shown at every foot, and provide sufficient detail of surface waters and flow, access control, buildings, structures, fire control facilities, etc., to meet the requirements of WAC 173-303-806(4)(a)(xviii) (Ecology 1989).

Attachment 33, Chapter 2.0, Figure 2.6, Figure 2.3 illustrates Prevailing Wind Direction for the Hanford Site (DOE/RL-91-28). Winds are predominately from the west.

*Previously denied on 7/19/04
Ecology re-evaluated & accepted
8/3/04*

Modification Class: ¹²³	Class 1	Class ¹ 1	Class 2	Class 3
Please check one of the Classes:	X			

Relevant WAC 173-303-830, Appendix I Modification: A.1.

Enter wording of the modification from WAC 173-303-830, Appendix I citation

- A General Permit Provisions
1. Administrative and Informational changes

Submitted by Co-Operator: <i>A.K. Ikenberry</i> 8/20/04 A.K. Ikenberry Date	Reviewed by RL Program Office: <i>R.F. Christensen</i> 12/11/03 R.F. Christensen Date	Reviewed by Ecology: <i>F. Jamison</i> 2/3/04 F. Jamison Date	Reviewed by Ecology: <i>E. R. Skinnerland</i> 8/3/04 E. R. Skinnerland Date
-----------------------------------------------------------------------------------	---------------------------------------------------------------------------------------------	---------------------------------------------------------------------	-----------------------------------------------------------------------------------

¹ Class 1 modifications requiring prior Agency approval.

² This is only an advanced notification of an intended Class ¹1, 2, or 3 modification, this should be followed with a formal modification request, and consequently implement the required Public Involvement processes when required.

³ If the proposed modification does not match any modification listed in WAC 173-303-830 Appendix I, then the proposed modification should automatically be given a Class 3 status. This status may be maintained by the Department of Ecology, or down graded to ¹1, if appropriate.

Hanford Facility RCRA Permit Modification Notification Form

Unit: PUREX Storage Tunnels	Permit Part & Chapter: Part III, Chapter 3 and Attachment 28
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Description of Modification:

Chapter 6.0, §6.1 and 6.1.1.1, remove and replace Chapter 6.0 with attached Chapter 4.0.
 Added *OFFICIAL USE ONLY* to Chapter 6.0.

6.1 SECURITY

The following sections describe the security measures, equipment, and warning signs used to control entry into the PUREX Storage Tunnels. Hanford Facility security measures are discussed in the Attachment 33, § 6.1, General Information Portion (DOE/RL-91-28).

6.1.1.1 24-Hour Surveillance System

The entire Hanford Facility is a controlled access area. For surveillance information refer to the Attachment 33, § 6.1, General Information Portion (DOE/RL-91-28).

*Previously denied on 7/19/04
 Ecology re-evaluated + accepted
 on 8/3/04*

Modification Class: ¹²³	Class 1	Class ¹ 1	Class 2	Class 3
Please check one of the Classes:	X			

Relevant WAC 173-303-830, Appendix I Modification: **A.1.**

Enter wording of the modification from WAC 173-303-830, Appendix I citation

- A. General Permit Provisions
 1. Administrative and informational changes

Submitted by ¹⁶ -Operator: <i>M. B. Lackey</i> Date: <i>12/17/04</i>	Reviewed by RL Program Office: <i>M. S. McCortick</i> Date: _____	Reviewed by Ecology: <i>G.P. Davis</i> Date: <i>8/3/04</i>	Reviewed by Ecology: <i>G.P. Davis</i> Date: <i>8/3/04</i>
M. B. Lackey	M. S. McCortick	R. Bond	E.R. Skinnarland

DEC 19 2003

¹ Class I modifications requiring prior Agency approval.
² This is only an advanced notification of an intended Class ¹1, 2, or 3 modification, this should be followed with a formal modification request, and consequently implement the required Public Involvement processes when required.
³ If the proposed modification does not match any modification listed in WAC 173-303-830 Appendix I, then the proposed modification should automatically be given a Class 3 status. This status may be maintained by the Department of Ecology, or down graded to ¹1, if appropriate.