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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

3100 Port of Benton Blvd • Richland, WA 99354 • (509) 372-7930

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October 22, 2007

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Richland Operations Office
United States Department of Energy
P.O. Box 550, MSIN: A7-50
Richland, Washington 99352

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United States Department of Energy
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Richland, Washington 99352

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United States Department of Energy
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Ms. Jennifer L. Nuzum, Director
Environmental Protection
Fluor Hanford, Inc.
P.O. Box 1000, MSIN: H8-12
Richland, Washington 99352

Mr. Charles G. Spencer, President
Washington Closure Hanford, LCC
2620 Fermi Ave, MSIN: H4-24
Richland, Washington 99354

Mr. William S. Elkins, Project Director
Bechtel National, Inc.
2435 Stevens Center Place, H4-02
Richland, Washington 99354

Mr. Moussa N. Jaraysi, Vice President
Environmental Programs
CH2M HILL Hanford Group, Inc.
P.O. Box 1500, MSIN: H6-03
Richland, Washington 99352

Re: Modification of the *Hanford Facility Resource Conservation and Recovery Act Permit for Storage* (WA7 89000 8967), Revision 8C, to Incorporate Final Permit Conditions for the 400 Area Waste Management Unit Located at the Fast Flux Test Facility (FFTF)

Dear Ladies and Gentlemen:

Enclosed is the final *Hanford Facility Resource Conservation and Recovery Act (RCRA) Permit*, WA7 89000 8967, Part III, Operating Unit 16, Unit-Specific Permit Conditions for the 400 Area Waste Management Unit. The unit is located at the FFTF in the 400 Area of the Hanford Site.

The success of this permitting process is due, in large part, to the spirit of teamwork and cooperation exhibited by the United States Department of Energy, Fluor Hanford, Inc., and the Washington State Department of Ecology.



Mr. David A. Brockman *et al.*
October 22, 2007
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The Permit is being issued in accordance with the applicable provisions of the Hazardous Waste Management Act, Chapter 70.105, Revised Code of Washington (RCW), and the regulations promulgated in Chapter 173-303, Washington Administrative Code (WAC).

Also enclosed with this letter are:

1. Responsiveness Summary.
2. Fact Sheet.
3. Permit Attachment 3, Permit Applicability Matrix.
4. Permit List of Attachments.
5. Permit Addendum List, which includes the approved 400 Area Waste Management Unit Part A Form and applicable chapters.

Additional copies of the Permit will be provided on CD-ROM, if requested.

This Permit is effective November 21, 2007.

During the 45-day public comment period of the draft Part III, Operating Unit 16, Unit-Specific Permit Conditions for the 400 Area Waste Management Unit, we received two comments. One comment was from the public and one was from the Confederated Tribes of the Umatilla Indian Reservation. The comments are addressed in the enclosed Responsiveness Summary as required by WAC 173-303-840(9).

The Department of Ecology distributed copies of this permit to the Administrative Record and the United States Department of Energy Reading Room. The Permit will also be posted on the Ecology web site at www.ecy.wa.gov/programs/nwp. Due to security, copies on the internet will not contain "Official Use Only" (OUO) information. OUO copies may be viewed in accordance with instructions provided at the locations where the Permit is available.

You have the right to appeal this portion of the Permit within 30 days upon receipt of this document. Pursuant to Chapter RCW 43.21B, your appeal must be filed with the Pollution Control Hearings Board, and a copy provided to Ecology, within 30 days of the date of your receipt of this document.

If you choose to appeal this action or decision, your notice of appeal must contain:

1. A copy of the unit-specific permit you are appealing, and
2. A copy of the application for the permit per WAC 173-303-845.

Your appeal must be filed with:
Pollution Control Hearings Board
4224 6th Avenue SE, Rowe Six, Bldg. 2
P.O. Box 40903
Lacey, Washington 98504-0903

Your appeal must also be served on:
Washington State Department of Ecology
Appeals Coordinator
P.O. Box 47608
Olympia, Washington 98504-7608

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In addition, please send a copy of your appeal to:

Washington State Department of Ecology
Nuclear Waste Program
3100 Port of Benton Boulevard
Richland, Washington 99354-6018

According to the rules of the Pollution Control Hearings Board, any appeal must contain the following:

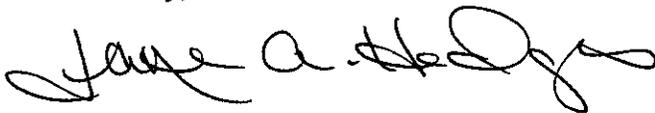
- The appellant's name and address.
- The coverage date.
- The Permit number that is being appealed.
- A description of the portion of the Permit that is the object of the appeal.
- A clear, separate, and concise statement of each error alleged to have been committed.
- A concise statement of facts the requester relies upon to sustain such statements of the alleged error.
- A statement setting forth the relief sought.

For additional information, visit the Environmental Hearings Office Website at <http://www.eho.wa.gov>.

Your appeal alone will not stay the effectiveness of this Permit. Stay requests must be submitted in accordance with RCW 43.21B.

If you have any questions regarding this action, contact Jeff Ayres at 509-372-7881.

Sincerely,



Jane A. Hedges
Program Manager
Nuclear Waste Program

ja/pll
Enclosures 6

cc: See next page

Mr. David A. Brockman *et al.*
October 22, 2007
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cc w/enc:

Hanford Operating Record General File
USDOE Reading Room
Administrative Record: 400 Area WMU *S-4-2*
Environmental Portal

cc w/CD enc:

Dave Bartus, EPA
Nick Ceto, EPA
Susan Leckband, HAB
Stuart Harris, CTUIR
Gabriel Bohnee, NPT
Russell Jim, YN
Ken Niles, ODOE

cc w/o enc:

Doug Chapin, USDOE
Al Farabee, USDOE
Tony McKarns, USDOE
Tony Miskho, FH

**Responsiveness Summary
Hanford Facility RCRA Permit, Revision 8C**

400 Area Waste Management Unit

Responsiveness Summary

Ecology received the following comments, and has responded to each as follows:

Comment No. 1

(via email August 28, 2007)

From: Eric Watson [smokinjo29@yahoo.com]

Sent: Tuesday, August 28, 2007 11:28 PM

To: Ayres, Jeff (ECY)

Subject: nucular waist disposal response

I object to the storage plan you have for the nucular waist plan. I feel that any nucular waist should be taken and held to levels beyond any chance that any nucular waist can be brought into our living space or chance that it may contaminate our surface and underground waters. Such as well waters. Surface waters and city waters can be monitored. However, well waters cannot be monitored.

I have seen on the Discovery channel a machine that drills tunnels large enough to make tunnels to make roadways or passages under the sea bed miles long. I suggest that there be a tunnel to the depth of 1 mile or more towards the earths core to dispose of such materials. This depth should keep any hazardous material away from our waters as well as our surface areas.

Your idea is a good one but I feel that keeping a hazardous material and its contaminated objects as you suggested is not a safe idea. Perhaps, Bush might have another disaster upon our soil and it become exposed to the waters, the public or other natural issues that may cause it to break open and become exposed. Once it hits the waters, contamination becomes a really big issue.

My idea is an expensive one but I'm sure the government has the funds to support the safe disposal of such hazardous materials. Look at how many billions they waist on the Iraq war as well as the war on drugs.

I hope that my comment will be accepted and discussed among you. Please let me know.

Thank you

Sincerely

Eric Watson
253 875 3451

Ecology Response

Thank you very much for your comment. The 400 Area Waste Management Unit (WMU) is not being established as a disposal option for the elemental sodium and sodium contaminated mixed waste. This unit is being permitted only as a containerized storage area for specific mixed wastes that are only generated at the Fast Flux Test Facility (FFTF). The storage areas are being permitted and regulated in strict accordance with State of Washington and federal regulations and guidelines. The waste will be removed from the permitted storage areas once practical treatment options for the waste have been developed.

**Responsiveness Summary
Hanford Facility RCRA Permit, Revision 8C**

400 Area Waste Management Unit

Comment No. 2

From: Confederated Tribes of the Umatilla Indian Reservation (refer to following letter dated September 27, 2007).



CONFEDERATED TRIBES
of the
Umatilla Indian Reservation

DEPARTMENT OF SCIENCE AND ENGINEERING

P.O. Box 638
73239 Confederated Way
PENDLETON, OREGON 97801
Phone: (541) 966-2400
Fax: (541) 278-5380

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OCT 01 2007

Department of Ecology
NWP - Richland

September 27, 2007

**COPY FOR YOUR
INFORMATION**

Ms. Jane Hedges, Program Manager
Nuclear Waste Program
WA Department of Ecology
3100 Port of Benton
Richland, WA 99354

SUBJECT: 400 Area Waste Management Unit

Dear Ms. Hedges,

The Confederated Tribes of the Umatilla Indian Reservation (CTUIR) Department of Science and Engineering (DOSE) are providing brief comments on the proposed RCRA permit application for the 400 Area Waste Management Unit. The underlying motivation for all these comments is a vital interest in the current and future conditions of Hanford lands. CTUIR policy and end state vision is of CTUIR tribal members safely using the cleaned and restored natural and cultural resources across the Hanford site. Therefore, most of comments emphasize the need to adequately characterize contamination, evaluate risks to tribal members, and develop lifecycle approaches to cleanups and permits.

Based on the SEPA checklist and fact sheet, our comments and questions are as follows:

1. The information provided mentions a steel building for sodium fuel storage and a large fenced outside area for debris, drums, boxes, and equipment. The volumes and other details are not presented in the fact sheet. However, since this is a mixed waste (radioactive and hazardous) facility, there may be radioactive equipment and hazardous or caustic materials stored outside. Without more detail, the CTUIR DOSE is not sure this is the best management approach, especially since this is indefinite "long-term" storage "until treatment is available." The pathway to develop treatment is not mentioned, but should be a condition of the permit, and a finite time period should be included. How will indefinite long-term storage affect FFTF decommissioning? Should the materials be moved to a central storage location in the Central Plateau? What other options were considered?

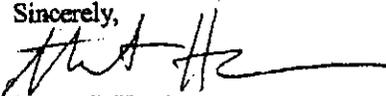
**Responsiveness Summary
Hanford Facility RCRA Permit, Revision 8C**

400 Area Waste Management Unit

2. The fact sheet did not have enough information. We recommend using the 118-B-1 ESD fact sheet that EPA issued as a model.

If you have any further questions please feel free to contact Dr. Harper at 542-966-2804 or myself at 541-966-2400.

Sincerely,



Stuart G. Harris
Director
CTUIR Department of Science and Engineering

CC:

David Brockman, DOE-RL
Kevin Clarke, DOE-RL
Rob Hastings, DOE-RL
Barbara Harper, CTUIR DOSE
Ken Niles, Oregon DOE
Ron Skinnerland, WA Ecology
Gabe Bohnee, Nez Perce Tribe
Russell Jim, Yakama Nation
File copy

Responsiveness Summary
Hanford Facility RCRA Permit, Revision 8C
400 Area Waste Management Unit

Ecology Response

- 1a. Comment: *The information provided mentions a steel building for sodium fuel storage and a large fenced outside area for debris, drums, boxes, and equipment. The volumes and other details are not presented in the fact sheet.*

Ecology Response: The volumes and other details for this treatment, storage and disposal unit can be found in the attached "Part III Operating Unit 16 Permit Conditions Unit Description" and List of Addendums that are included with the public comment package with the "Focus Sheet" that was submitted to the public for review and comment. This degree of detail is not appropriate for the fact sheet.

- 1b. Comment: *However, since this is a mixed waste (radioactive and hazardous) facility, there may be radioactive equipment and hazardous or caustic materials stored outside. Without more detail, the CTUIR DOSE is not sure this is the best management approach, especially since this is indefinite "long-term" storage "until treatment is available."*

Ecology Response: Details of what is stored at the TSD storage unit can be found in the "Part III Operating Unit 16 Permit Conditions – Unit Description," and the List of Addendums that was included with the public comment package and "Focus Sheet."

- 1c. Comment: *The pathway to develop treatment is not mentioned, but should be a condition of the permit, and a finite time period should be included.*

Ecology Response: The information requested is included in the draft Permit. In "Part III Operating Unit 16 Permit Conditions – Unit Description" Section B.7, "Special Procedural Requirements" states "The 400 Area WMU will not conduct any land disposal restrictions (LDR) treatment of waste in storage. Therefore, the LDR requirements applicable to the 400 Area WMU are limited to the record keeping requirements in WAC 173-303-380(1) (o) and LDR reporting requirements under the Hanford Federal Facility Agreement and Consent Order. Mixed waste stored in the 400 Area WMU will be treated in accordance with Permit Condition II.S."

Hanford Facility RCRA Permit, Permit Condition II.S states, "Unless specifically identified otherwise in the HFFACO (Hanford Facility Agreement and Consent Order), the Permittees will comply with all LDR requirements as set forth in WAC 173-303-140.

Every calendar year the U.S. Department of Energy submits the *Hanford Site Mixed Waste Land Disposal Restrictions Summary Report* LDR Summary Report in accordance with *Hanford Federal Facility Agreement and Consent Order* (Tri-Party Agreement) Milestone M-26-01 series. The current report (DOE/RL-2007-16) identifies stored mixed waste and the proposed treatment pathway for LDR waste at Hanford. The mixed waste stored at the 400 Area WMU has been identified and proposed treatment pathway has been provided for this waste. Table 4-1 identifies "Deactivation and conversion to sodium hydroxide" as the treatment process, and states "Treatment is planned to begin after 2015" for the planned treatment period. Ecology has approved this LDR report.

Responsiveness Summary
Hanford Facility RCRA Permit, Revision 8C

400 Area Waste Management Unit

1d. Comment: *How will indefinite long-term storage affect FFTF Decommissioning?*

Ecology Response: There will be no affect on the Fast Flux Test Facility (FFTF) Decommissioning by the long-term storage of the mixed waste in the 400 Area WMU.

1e. Comment: *Should the materials be moved to a central storage location in the Central Plateau? What other options were considered?*

Ecology Response: The U.S. Department of Energy (USDOE) has performed a review of risks associated with moving the waste to another location within the Hanford Site. Based on the review, moving the waste was not considered feasible for the following reasons:

- 1) Transportation to another location would require the design and fabrication of a special shielded container to ship the Core Component Pots due to the radiation levels measured. All equipment for containerized storage of sodium and sodium-contaminated debris is available at FFTF and not available at the Central Plateau. There would be additional risk to the public and workers to move the containers from their present location.
- 2) In order to store the waste in the Central Plateau various safety analysis reviews would have to be done to address worker safety during activities necessary to prepare for storage of the waste. Additional costs would be incurred to prepare the Central Plateau to store safely the sodium-wetted waste.
- 3) The waste would have to be transported back to FFTF for treatment of sodium contaminates sometime in the future, since the plan is to treat sodium waste in the 400 Area during decontamination and decommissioning.

USDOE concluded, based on this review, that providing permitted storage in the 400 Area was the most feasible for the storage of sodium-contaminated waste. Ecology also reviewed information for the storage of the sodium-contaminated waste and concurs with USDOE's findings.

2. Comment: *The fact sheet did not have enough information. We recommend using the 118-B-1 ESD fact sheet that EPA issued as a model.*

Ecology Response: Thank you for the comment. The fact sheet for the 118-B-1 Explanation of Significant Difference (ESD) did have more detail, but was written to address a different audience and for a different purpose. Ecology's public notices for proposed permit decisions have brief descriptions – enough to allow a reader to decide if she or he is interested enough to get more information, and to inform the reader of how to get the permit documents. We hope to widen public participation in Hanford decision-making, and therefore, we aim our notices to be understandable to lay audiences. We appreciate your concern and will continue to review our notices to ensure they have adequate information for the public.

**Responsiveness Summary
Hanford Facility RCRA Permit, Revision 8C
400 Area Waste Management Unit**



Public Comment Period

400 Area Waste Management Unit
August 27 through October 11, 2007

The Washington State Department of Ecology invites you to comment on a proposed change to the Hanford Facility Resource Conservation and Recovery Act Permit.

The change will add a new treatment, storage, and disposal unit to the sitewide permit. The unit consists of two mixed waste container storage areas at the Fast Flux Test Facility (FFTF).

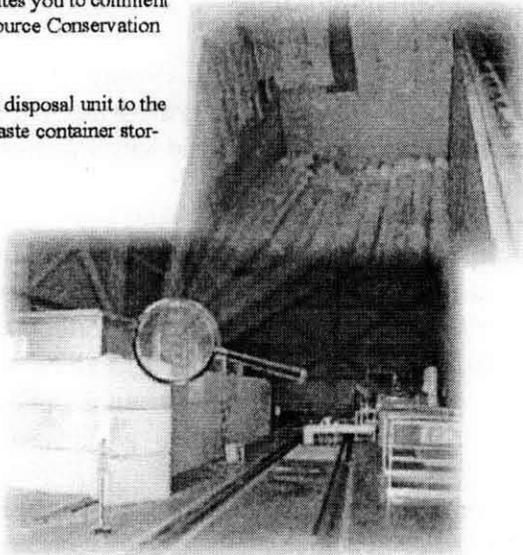
Permittees

Owner/Operator: U.S. Department of Energy,
Richland Operations Office,
P.O. Box 550
Richland, WA 99352

Co-operator: Fluor Hanford
P.O. Box 1000
Richland, WA 99352

Where is the unit?

The unit is at the FFTF which is 10 miles from Richland on the Hanford Site in the 400 Area. It is south of the central plateau and just a few miles west of the commercial nuclear power plant that Energy Northwest runs.



Waste sodium stored in the Fuel Storage facility.

The FFTF was a sodium-cooled research and test reactor that supported the nation's liquid metal fast breeder reactor program. Its mission has ended, and shutdown is under way.

The two container storage areas are the Fuel Storage Facility and the interim storage area. The Fuel Storage Facility is called Building 403. It's a steel-frame metal-sided high bay building. The interim storage area is outdoors. It is a fenced area, 156 x 75 meters, with lighting around the perimeter.

What wastes are stored there?

The wastes are a result of the FFTF's shutdown. The mixed waste consists of metallic sodium, sodium hydroxide, and sodium-contaminated debris such as piping and equipment. The sodium is in solid form and is stored under inert gas. The permittees store the waste in containers like drums and boxes in the Fuel Storage Facility. They will store unique components from the FFTF in the interim storage area. Unique components are pieces of equipment such as large pumps, valves, tube bundles and cold traps. The permittees will only store waste from the FFTF's shutdown in the 400 Area Waste Management Unit.

The 400 Area Waste Management Unit storage areas are for long-term storage of mixed wastes. Mixed wastes have both radioactive and dangerous waste components. The permittees will store the wastes until treatment is available. There is no treatment or disposal of wastes in this unit.

How will the permit change?

This modification will add a new section to the Hanford sitewide permit. It will appear in Part III (unit-specific conditions) as Operating Unit 16. The new section adds permit conditions that apply specifically to the 400 Area mixed waste storage. The conditions cover topics like waste management, training, preparedness and prevention, monitoring, and closure.

If you need this publication in an alternate format, please call the Nuclear Waste Program at 509-372-7950. Persons with hearing loss can call 711 for Washington Relay Service. Persons with a speech disability can call 877-833-6341.

**Responsiveness Summary
Hanford Facility RCRA Permit, Revision 8C
400 Area Waste Management Unit**

How can you learn more about the changes?

The draft permit, its statement of basis (a summary), the State Environmental Policy Act checklist, and proposed determination of nonsignificance are available online at <http://www.ecy.wa.gov/programs/nwp/commentperiods.htm>. To review the draft permit changes at Ecology's Nuclear Waste Program Office, call 509-372-7920. The proposal is also available for review at Hanford's Public Information Repositories. They are listed below.

How can you make a comment?

Send all comments in writing, by Thursday, October 11, 2007, to:

Jeff Ayres
Washington State Department of Ecology
3100 Port of Benton Blvd
Richland, WA 99354
509-372-7971 fax
jayr461@ecy.wa.gov

Ecology does not plan to hold a public hearing at this time. But if the public expresses interest one can be scheduled. To request a hearing, contact Madeleine Brown at 509-372-7936 or mabr461@ecy.wa.gov.

The public comment period runs from August 27 to October 11, 2007. We will consider all comments we receive during this period and issue a response to comments when we issue the final decision on the permit change.

Hanford Public Information Repositories

Richland
U.S. Department of Energy
Reading Room
Consolidated Information Center,
Room 101-1,
2770 University Dr.
Attn: Janice Parthree
509-372-7443

Spokane
Gonzaga University
Foley Center
502 E. Boone Ave.
Attn: Linda Pierce
509-323-3834

Seattle
University of Washington
Suzzallo Library
Government Publications Division
Attn: Eleanor Chase
206-543-4664

Portland
Portland State University
Branford Price Millar Library
1875 SW Park Ave.
Attn: Don Frank
503-725-4132

Hanford Cleanup Line 1-800-321-2008

Nuclear Waste Program
3100 Port of Benton Blvd.
Richland, WA 99354

E C O L O G Y
DEPARTMENT OF
WASHINGTON STATE



Responsiveness Summary
Hanford Facility RCRA Permit, Revision 8C
400 Area Waste Management Unit

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Classified Legals

Public Comment Period August 27 through October 11, 2007

Fast Flux Test Facility Mixed Waste Storage Areas

The Washington State Department of Ecology invites you to comment on a proposed change to the Hanford Facility RCRA Permit.

The change will add a new treatment, storage, and disposal unit to Hanford's sitewide permit. The unit consists of two mixed waste container storage areas at the Fast Flux Test Facility (FFTF). The formal name for this permit modification is the 400 Area Waste Management Unit.

Permittee/Owner/Operator: U.S. Department of Energy, Richland Operations Office, P.O. Box 550 Richland, WA 99352

Co-operator: Fluor Hanford, P.O. Box 1000 Richland, WA 99352

Where is the unit? The unit is at the FFTF. The FFTF is 10 miles from Richland in a part of the Hanford Site called the 400 Area. It is south of the central plateau and just a few miles west of the commercial nuclear power plant that Energy Northwest runs. The FFTF was a sodium-cooled research and test reactor that supported the nation's liquid metal fast breeder reactor program. The FFTF's mission has ended and general shutdown is under way. The and two container storage areas are the fuel storage facility and the interim storage area. The Fuel Storage Facility is called Building 403. It's a steel-frame extra metal-sided high bay building. The interim storage area is outdoors. It is a fenced area, 156 x 75 meters, with lighting around the perimeter.

What wastes are stored there? The wastes result from FFTF's shutdown. The mixed waste consists of metallic sodium, sodium

hydroxide, and sodium-contaminated debris such as piping and equipment. The sodium is in solid form and is stored under inert gas. The permittees store the waste in containers like drums and boxes in the fueling storage facility. They will store unique components less from the FFTF in the interim storage area. Unique fitting components are pieces of equipment such as large pumps, valves, tube bundles, and cold traps. The permittees will only store waste from the FFTF's shutdown in the 400 Area Waste Management Unit. The FFTF's mixed waste storage areas are for long-term storage of mixed wastes. (Mixed wastes have both radioactive and dangerous waste components.) The permittees will store the wastes until treatment is available. There is no treatment or disposal of wastes in this unit.

How will the permit change? This modification will add a new section to the Hanford sitewide permit. It will appear in Part III (unit-specific conditions) as Operating Unit 16. The new section adds permit conditions that apply specifically to the FFTF mixed waste storage areas. The conditions cover topics like waste management, training, preparedness and prevention, monitoring, and closure.

How can you learn more about the changes? The draft permit application, its statement of basis (a summary), the State Environmental Policy Act checklist, and proposed determination of non-significance are available online at <http://www.ecy.wa.gov/programs/nwp/commentperiods.htm>. To review the draft permit changes at Ecology's Nuclear Waste Program Office, call 509-372-7920. You can also review the proposal at Hanford's public information repositories: Portland State University Brantford Price Millar Library 1875 SW Park Avenue Attention: Don Frank (503) 725-4132 Richland U.S. DOE Public Reading Room Pacific Northwest National Laboratory Consolidated Information Center (WSU) CY2770 University Drive, Room 101L Attention: Janice Parthre (509) 372-7443 Seattle University of Washington Suzzallo Library Government Publications Division Attention: Eleanor Chase (206) 543-4664 Spokane Gonzaga University Foley Center 101-311 East 502 Boone Attention: Linda Pierce (509) 323-3834

How can you make a comment? Send all comments in writing, by Thursday, October 11, 2007, to: Jeff Ayres, Washington State Department of Ecology, 3100 Port of Benton Blvd, Richland, WA 99354, fax: 509-372-7971, fax: jayr461@ecy.wa.gov

Ecology does not plan to hold a public hearing, but if we receive a request for one, we will consider it. To request a hearing, or for more information, contact Madeline Brown at 509-372-7938 or mabr461@ecy.wa.gov. You also can call the toll-free Hanford Cleanup Line, 1-800-321-2008. The public comment period runs from August 27 to October 11, 2007. We will consider all comments we receive during this period. We will issue a response to comments when we issue the final decision on the permit change.

9/29/07 8/26

Permit Number: WA7 89000 8967

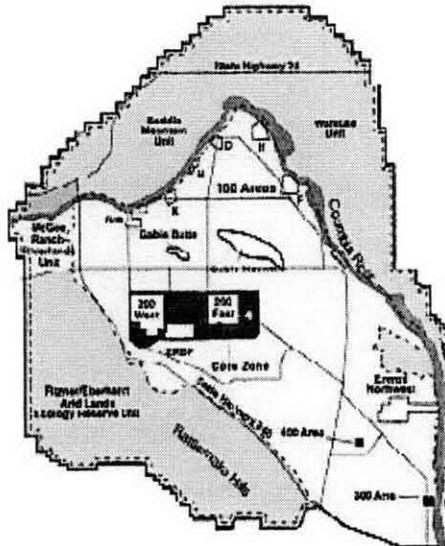
Revision Number: 8C



Hanford Facility Resource Conservation and Recovery Act Permit, Dangerous Waste Portion

Revision 8C

For the Treatment, Storage, and Disposal of Dangerous Waste



Washington State Department of Ecology
Nuclear Waste Program

October 2007

Permit Number: WA7 89000 8967

Revision Number: 8C

For additional copies of this permit contact:

Washington State Department of Ecology

3100 Port of Benton Boulevard

Richland, Washington 99354-1670

509-372-7950

The Department of Ecology is an equal-opportunity agency and does not discriminate on the basis of race, creed, color disability, age, religion, national origin, sex, marital status, disabled-veteran status, Vietnam-era veteran status or sexual orientation.

For more information or if you have special accommodation needs, please contact the Nuclear Waste Program at (509) 372-7950.

*Department of Ecology Headquarters telecommunications device for the deaf (TDD) number is:
(360) 407-6006*

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1 **List of Attachments**

- 2 The following listed documents are attached in their entirety. However, only those portions of the
3 attachments specified in Parts I through VI are enforceable conditions of this Permit and subject to the
4 permit modification requirements of Permit Condition I.C.3. Changes to portions of the attachments,
5 which are not subject to the permit modification process, will be addressed in accordance with Permit
6 Conditions I.E.8, I.E.11, I.E.13, I.E.15, through I.E.20, and I.E.22. Ecology has, as deemed necessary,
7 modified specific language in these attachments. These modifications are described in the conditions
8 (Parts I through VI), and thereby supersede the language of the attachment.
- 9 Attachment 1 Hanford Federal Facility Agreement and Consent Order, (as amended)
10 <http://www.hanford.gov/tpa/coverpg.htm>
- 11 Attachment 2 Hanford Facility Legal Description, from Class 1¹ modification, dated
12 January 7, 1999
- 13 Attachment 3 Permit Applicability Matrix, dated March 2006
- 14 Attachment 4 *Hanford Emergency Management Plan*, DOE/RL-94-02 Revision 2, as amended and
15 approved modifications
- 16 Attachment 5 Purgewater Management Plan, July 1990
- 17 Attachment 6 Hanford Well Maintenance and Inspection Plan, BHI-01265, Revision 0, May 1999
- 18 Attachment 7 Policy on Remediation of Existing Wells and Acceptance Criteria for RCRA and
19 CERCLA, June 1990
- 20 Attachment 33 Hanford Facility Dangerous Waste Permit Application General Information Portion,
21 DOE/RL-91-28, Revision 7, and approved modifications

1 **Introduction**

2 Where information regarding treatment, management, and disposal of the radioactive source, byproduct
3 material, special nuclear material (as defined by the Atomic Energy Act of 1954, as amended) and/or the
4 radionuclide component of mixed waste has been incorporated into this permit, it is not incorporated for
5 the purpose of regulating the radiation hazards of such components under the authority of this permit or
6 Chapter 70.105 RCW.

7 Pursuant to Chapter 70.105 RCW, the Hazardous Waste Management Act (HWMA) of 1976, as
8 amended, Chapter 70.105D RCW, the Model Toxics Control Act (MTCA), and regulations promulgated
9 there under by the Washington State Department of Ecology (hereafter called Ecology), codified in
10 Chapter 173-303 Washington Administrative Code (WAC), Dangerous Waste Regulations, a Dangerous
11 Waste Permit is issued to the United States Department of Energy (USDOE) - Richland Operations
12 Office (RL) and Office of River Protection (ORP), [owner/operator], and its contractors, Fluor Hanford,
13 Inc. (FH), [co-operator], Pacific Northwest National Laboratory (PNNL), [co-operator], CH2MHILL
14 Hanford Group, Inc. (CH2MHILL), [co-operator], Washington Closure Hanford, LLC (WCH), [co-
15 operator], and Bechtel National, Incorporated (BNI), [co-operator], hereafter called the Permittees, for
16 the treatment, storage, and disposal of dangerous waste at the Hanford Facility.

17 This Dangerous Waste Permit, issued in conjunction with the United States Environmental Protection
18 Agency's (hereafter called EPA) Hazardous and Solid Waste Amendments Portion of the Resource
19 Conservation and Recovery Act (RCRA) Permit for the Treatment, Storage, and Disposal (TSD) of
20 Hazardous Waste (HSWA Permit), constitutes the RCRA Permit for the Hanford Facility. Use of the
21 term "Permit" within the Dangerous Waste Permit will refer to the Dangerous Waste Permit, while use of
22 the term "Permit" within the HSWA Permit, will refer to the HSWA Permit. Use of the same term in
23 both the Dangerous Waste Permit and the HSWA Permit, will have the standard meaning associated with
24 the activities addressed by the permit in which the term is used. Such meanings will prevail, except
25 where specifically stated otherwise.

26 The Permittees will comply with all terms and conditions set forth in this Permit and those portions of the
27 Attachments that have been specifically incorporated into this Permit. When the Permit and the
28 Attachments (except Permit Attachment 1) conflict, the wording of the Permit will prevail. The Permit is
29 intended to be consistent with the terms and conditions of the Hanford Federal Facility Agreement and
30 Consent Order (HFFACO, Permit Attachment 1). The Permittees will also comply with all applicable
31 state regulations, including Chapter 173-303 WAC.

32 Applicable state regulations are those which are in effect on the date of issuance, or as specified in
33 subsequent modifications of this Permit. In addition, applicable state regulations include any self-
34 implementing statutory provisions and related regulations which, according to the requirements of the
35 HWMA, as amended, or other law(s), are automatically applicable to the Permittees' dangerous waste
36 management activities, notwithstanding the conditions of this Permit.

37 This Permit is based upon the Administrative Record, as required by WAC 173-303-840. The
38 Permittees' failure in the application, or during the Permit issuance process, to fully disclose all relevant
39 facts, or the Permittees' misrepresentation of any relevant facts at any time, will be grounds for the
40 termination or modification of this Permit and/or initiation of an enforcement action, including criminal
41 proceedings. The Permittees will inform Ecology of any deviation from the Permit conditions, or
42 changes in the information on which the application is based, which would affect either the Permittees'
43 ability to comply, or actual compliance with the applicable regulations or the Permit conditions, or which
44 alters any condition of this Permit in any way.

1 Ecology will enforce all conditions of this Permit for which the State of Washington is authorized, or
2 which are "state-only" provisions (i.e., conditions broader in scope or more stringent than the federal
3 RCRA program). Any challenges of any Permit condition may be appealed in accordance with
4 WAC 173-303-845. In the event that any Permit condition is challenged by any Permittee under
5 WAC 173-303-845, Ecology may stay any such Permit condition as it pertains to all Permittees, in
6 accordance with the same terms of any stay it grants to the challenging Permittee. If such a stay is
7 granted, it will constitute a "stay by the issuing agency" within the meaning of RCW 43.21B.320(1).

8 This Permit has been developed to allow a step-wise permitting process of the Hanford Facility to ensure
9 the proper implementation of the HFFACO. In order to accomplish this, this Permit consists of six (6)
10 parts.

11 **Part I, Standard Conditions**, contains conditions which are similar to those appearing in all dangerous
12 waste permits.

13 **Part II, General Facility Conditions**, combines typical dangerous waste permit conditions with those
14 conditions intended to address issues specific to the Hanford Facility. Where appropriate, the general
15 facility conditions apply to all final status dangerous waste management activities at the Facility. Where
16 appropriate, the general facility conditions also address dangerous waste management activities which
17 may not be directly associated with distinct TSD units, or which may be associated with many TSD units
18 (i.e., spill reporting, training, contingency planning, etc.). Part II also includes conditions that address
19 corrective action at solid waste management units and areas of concern.

20 **Part III, Unit-Specific Conditions for Operating Units**, contains those Permit requirements that apply
21 to each individual TSD unit operating under final status. Conditions for each TSD unit are found in a
22 chapter dedicated to that TSD unit. These unit-specific chapters contain references to Standard
23 Conditions (Part I) and General Conditions (Part II), as well as additional requirements which are
24 intended to ensure that each TSD unit is operated in an efficient and environmentally protective manner.
25 Additional requirements may also be added when an operating unit ceases operations and undergoes
26 closure.

27 **Part IV, Unit-Specific Conditions for Corrective Action**, contains those permit requirements which
28 apply to specific RPP units that are undergoing corrective action under the HFFACO. RPP units may
29 include solid waste management units and other areas of concern (i.e., releases that are not at solid waste
30 management units and do not constitute a solid waste management unit) that are undergoing corrective
31 action. For The Comprehensive Environmental Response, Conservation, and Liability Act (CERCLA)
32 and RCRA past practice (RPP) units identified in the HFFACO, the corrective action conditions are
33 structured around continued coordination with, and reliance on, the investigation and cleanup
34 requirements established under the HFFACO. For TSD units identified in the HFFACO, the corrective
35 action conditions contemplate use of closure and post-closure processes to satisfy corrective action.

36 **Part V, Unit-Specific Conditions for Units Undergoing Closure**, contains those requirements which
37 apply to those specific TSD units, included in this part, that are undergoing closure. In accordance with
38 Section 5.3 of the Action Plan of the HFFACO, all TSD units that undergo closure, irrespective of permit
39 status, will be closed pursuant to the authorized State Dangerous Waste Program in accordance with
40 WAC 173-303-610. Requirements for each TSD unit undergoing closure are found in a chapter
41 dedicated to that TSD unit. These unit-specific chapters contain references to Standard Conditions
42 (Part I) and General Conditions (Part II), as well as additional requirements which are intended to ensure
43 that each TSD unit is closed in an efficient and environmentally protective manner.

1 **Part VI, Unit-Specific Conditions for Units in Post-Closure**, contains those requirements which apply
2 to those specific units in this part that have completed modified or landfill closure requirements, and now
3 only need to meet Post-Closure Standards. As set forth in Section 5.3 of the Action Plan of the
4 HFFACO, certain TSD units will be permitted for post-closure care pursuant to the authorized State
5 Dangerous Waste Program (173-303 WAC) and the Hazardous and Solid Waste Amendments.
6 Requirements for each unit undergoing post-closure care are found in a chapter, within this part,
7 dedicated to that unit. These unit specific chapters may contain references to Standard Conditions
8 (Part I) and General Conditions (Part II), as well as the unit specific conditions, all of which are intended
9 to ensure the unit is managed in an efficient, environmentally protective manner.

1 **Unit Status Table**

PERMIT REVISION	REVISION DATE	UNITS INCORPORATED
Permit Revision 0	8/29/94	616 NDWSF, 305-B Storage Facility, 183-H SEB, 300 ASE, 2727-S, NRDWSF
Permit Revision 1	4/28/95	Simulated High-Level Waste Slurry, 218-E-9 Borrow Pit Demo Site, 200 W Area Ash Pit Demo Site, 2101-M Pond, 216-B-3 Expansion Ponds
Permit Revision 2	8/29/95	Hanford Patrol Academy Demolition Site, 105-DR Large Sodium Fire Facility, 304 Concretion Facility
Permit Revision 3	11/25/96	4843 Alkali Metal Storage Facility, 3718-F Alkali Metal Treatment & Storage Facility, 303-K Storage Facility, 300 APT
Permit Revision 4	1/28/98	PUREX Storage Tunnels, LERF & 200 Area ETF, 242-A Evaporator, 325 HWTUs
Permit Revision 5	5/18/99	100 D Ponds, 1301-N & 1325-Liquid Waste Disposal Facility, 1324-N Surface Impoundment, 1324-NA Percolation Pond
Permit Revision 6	3/28/00	Permit Condition II.Y, Corrective Action
Permit Revision 7	2/27/01	Waste Treatment & Immobilization Plant, 300 Area WATS
Permit Revision 8	9/23/04	No new units, modification updates
Permit Revision 8A	3/6/06	Integrated Disposal Facility
Permit Revision 8B	1/2007	331-C Storage Unit, PFP Treatment Unit, 241-Z Treatment & Storage Tanks, 303-M Oxide Facility
Permit Revision 8C	8/2007	400 Area Waste Management Unit, 224-T TRUSAF

UNIT	Permit Revision		Comments/History
	Incorporated	Retired	

PART III, OPERATING UNITS

616 Nonradioactive DWSF	Rev. 6	Rev. 7	Closed, 9/5/01
242-A Evaporator	Rev. 4		
305-B Storage Facility	Rev. 0		Closed, 7/2/07
325 Hazardous Waste Treatment Units	Rev. 4		RLWT procedural closure, 9/04
LERF & 200 Area ETF	Rev. 4		
PUREX Storage Tunnels	Rev. 3		
Waste Treatment and Immobilization Plant	Rev. 7		Permitted unit under construction
Integrated Disposal Facility	Rev. 8A		
331-C Storage Unit	Rev. 8B		
400 Area Waste Management Unit	Rev. 8C		

PART V, UNDERGOING CLOSURE UNITS

100-D Ponds	Rev. 5	Rev. 6	Closed, 8/9/99
105 DR Large Sodium Fire Facility	Rev. 2	Rev. 6	Closed, 7/1/04
1301-N Liquid Waste Disposal Facility	Rev. 5		
1324-N Surface Impoundment	Rev. 5		
1324-NA Percolation Pond	Rev. 5		
1325-N Liquid Waste Disposal Facility	Rev. 5		
200 West Area Ash Pit Demo Site	Rev. 1	Rev. 6	Closed, 11/28/95
2101-M Pond	Rev. 1	Rev. 6	Closed, 11/28/95
216-B-3 Expansion Ponds	Rev. 1	Rev. 6	Closed, 7/31/95
218-E-8 Borrow Demolition Site	Rev. 1	Rev. 6	Closed, 11/28/95
2727-S Storage Facility	Rev. 0	Rev. 6	Closed, 7/31/95
300 Area Solvent Evaporator	Rev. 0	Rev. 6	Closed, 7/31/95
300 Area Waste Acid Treatment System	Rev. 6	Rev. 8B	Closed, 1/21/05
303-K Storage Facility	Rev. 4	Rev. 6	Closed, 7/22/02
304 Concretion Facility	Rev. 2	Rev. 6	Closed, 1/21/96
311 Tanks	Rev. 6	Rev. 7	Closed, 5/20/02. 300 Area WATS Part A
3718-F Alkali Metal Treatment /Storage	Rev. 3	Rev. 6	Closed, 8/4/98
4843 Alkali Metal Storage Facility	Rev. 3	Rev. 6	Closed, 4/14/97
Hanford Patrol Academy Demo Site	Rev. 2	Rev. 6	Closed, 11/28/95
Simulated High Level Waste Slurry	Rev. 1	Rev. 6	Closed, 9/6/95
PFP Treatment Unit (HA-20MB)	Rev. 8B	Rev. 8B	Closed, 2/8/05.
241-Z Treatment and Storage Tanks	Rev. 8B	Rev. 8B	Closed 2/22/07
303-M Oxide Facility	Rev. 8B	Rev. 8B	Closed; 6/15/06
224-T Transuranic Waste Storage and Assay Facility	Rev. 8C		

PART VI, POSTCLOSURE UNITS			
183-H Solar Evaporation Basin	Rev 4		
300 Area Process Trenches	Rev 3		
PROCEDURALLY CLOSED			
216-U-12 Crib	N/A	N/A	Closed, 7/19/07
221-T Test Facility	N/A	N/A	Closed, 2/22/99
2727-WA SRE Sodium Storage Bldg	N/A	N/A	Closed, 2/22/99
324 Pilot Plant	N/A	N/A	Closed, 6/9/97
332 Storage Facility	N/A	N/A	Closed, 4/21/97
437 Maintenance and Storage Facility	N/A	N/A	Closed, 9/11/03
Biological Treatment Test Facilities	N/A	N/A	Closed, 12/10/96
Physical/Chemical Treatment Test Facilities	N/A	N/A	Closed, 5/13/96
Sodium Storage/Sodium Reaction	N/A	N/A	Closed, 9/17/03
Thermal Treatment Test Facilities	N/A	N/A	Closed, 5/13/96
TO BE INCORPORATED			
1706-KE Waste Treatment System			
207-A South Retention Basin			
216-A-10 Crib			
216-A-29 Ditch			
216-A-36B Crib			
216-A-37-1 Crib			
216-B-3 Main Pond			
216-B-63 Trench			
216-S-10 Pond & Ditch			
222-S Dangerous & Mixed Waste TSD Unit			
241-CX Tank System			
600 Area Purge Water Storage and Treatment Facility (Modu Tanks)			
Central Waste Complex			
Contact Handled Transuranic Mixed Waste Packaging and Interim Storage Facility			
DST System/204-AR Waste Unloading Station			
Grout Treatment Facility			
Hexone Storage & Treatment Facility			
IHLW Interim Storage/Canister Storage Building			
Low-Level Burial Grounds			
Nonradioactive Dangerous Waste Landfill			
Single-Shell Tank System			
T Plant Complex			
Waste Encapsulation and Storage Facility			
Waste Receiving and Processing Facility			
TRANSITION UNDER HFFACO ACTION PLAN, SECTION 8 (Will not be incorporated into Permit)			
B Plant Complex			
PUREX Plant			

1 **DEFINITIONS**

2 Except with respect to those terms specifically defined below, all definitions contained in the HFFACO,
3 May 1989, as amended, and in WAC 173-303-040 and other portions of Chapter 173-303 WAC are
4 hereby incorporated, in their entirety, by reference into this Permit. For terms defined in both
5 Chapter 173-303 WAC and the HFFACO, the definitions contained in Chapter 173-303 WAC will
6 control within this Permit. Nonetheless, this Permit is intended to be consistent with the HFFACO.

7 Where terms are not defined in the regulations, the Permit, or the HFFACO, a standard dictionary
8 reference, or the generally accepted scientific or industrial meaning of the terms will define the meaning
9 associated with such terms.

10 As used in this Permit, words in the masculine gender also include the feminine and neuter genders,
11 words in the singular include the plural, and words in the plural include the singular.

12 The following definitions apply throughout this Permit:

- 13 a. The term "**Area of Concern**" means any area of the Facility where a release of dangerous waste or
14 dangerous constituents has occurred, is occurring, is suspected to have occurred, or threatens to
15 occur.
- 16 b. The term "**Contractor(s)**" means, unless specifically identified otherwise in this Permit, or
17 Attachments, Fluor Hanford, Inc. (FH), Pacific Northwest National Laboratory (PNNL), Washington
18 Closure Hanford LLC (WCH), CH2M HILL Hanford Group, Inc. (CH2MHILL), and Bechtel
19 National, Inc. (BNI).
- 20 c. The term "**Critical Systems**" as applied to determining whether a Permit modification is required,
21 means those specific portions of a TSD unit's structure, or equipment, whose failure could lead to the
22 release of dangerous waste into the environment, and/or systems which include processes which
23 treat, transfer, store, or dispose of regulated wastes. A list identifying the critical systems of a
24 specific TSD unit may be developed and included in Part III, V, and/or VI of this Permit. In
25 developing a critical system list, or in the absence of a critical system list, WAC 173-303-830
26 Modifications will be considered.
- 27 d. The term "**Dangerous Constituent**" means any constituent identified in WAC 173-303-9905 or
28 40 CFR Part 264 Appendix IX, any constituent which caused a waste to be listed or designated as
29 dangerous under Chapter 173-303 WAC, and any constituents within the meaning of hazardous
30 substance at RCW 70.105D.020(7).
- 31 e. The term "**Dangerous Waste**" means those solid wastes designated under Chapter 173-303 WAC as
32 dangerous or extremely hazardous waste. As used in the Permit, the phrase "dangerous waste" will
33 refer to the full universe of wastes regulated by Chapter 70.105 RCW and Chapter 173-303 WAC
34 (including dangerous waste, hazardous waste, extremely hazardous waste, mixed waste, and acutely
35 hazardous waste).
- 36 f. The term "**Days**" means calendar days, unless specifically identified otherwise. Any submittal,
37 notification, or recordkeeping requirement that would be due, under the Conditions of this Permit, on
38 a Saturday, Sunday, or federal, or state holiday, will be due on the following business day, unless
39 specifically stated otherwise in the Permit.
- 40 g. The term "**Director**" means the Director of the Washington State Department of Ecology, or a
41 designated representative. The Program Manager of the Nuclear Waste Program (with the address as
42 specified on page one [1] of this Permit) is a duly authorized and designated representative of the
43 Director for purposes of this Permit.

- 1 h. The term "**Ecology**" means the Washington State Department of Ecology (with the address as
2 specified on page one [1] of this Permit).
- 3 i. The term "**Facility**" means all contiguous land, structures, other appurtenances, and improvements on
4 the land used for recycling, reusing, reclaiming, transferring, storing, treating, or disposing of
5 dangerous waste. The legal and physical description of the Facility is set forth in Permit
6 Attachment 2.
- 7 j. The term "**Facility**" for the purposes of corrective action under Permit Condition II.Y, means all
8 contiguous property under the control of the Permittees and all property within the meaning of
9 "**facility**" at RCW 70.105D.020(3) as set forth in Permit Attachment 2.
- 10 k. The term "**HFFACO**" means the Hanford Federal Facility Agreement and Consent Order, as
11 amended (Commonly referred to as Tri-Party Agreement [TPA]).
- 12 l. The term "**Permittees**" means the United States Department of Energy (owner/operator), Fluor
13 Hanford Inc. (Co-operator), Washington Closure Hanford LLC (Co-operator), Bechtel National, Inc.
14 (Co-operator), CH2M HILL Hanford Group, Inc. (Co-operator), and Pacific Northwest National
15 Laboratory (Co-operator).
- 16 m. The term "**Permittees**" for purposes of corrective action under Permit Condition II.Y means only the
17 United States Department of Energy (owner/operator).
- 18 n. The term "**Raw Data**" means the initial value of analog or digital instrument output, and/or manually
19 recorded values obtained from measurement tools or personal observation. These values are
20 converted into reportable data (e.g., concentration, percent moisture) via automated procedures
21 and/or manual calculations.
- 22 o. The term "**RCRA Permit**" means the Dangerous Waste Portion of the RCRA Permit for the
23 Treatment, Storage, and Disposal of Dangerous Waste (Dangerous Waste Permit) issued by the
24 Washington State Department of Ecology, pursuant to Chapter 70.105 RCW and Chapter 173-303
25 WAC, coupled with the HSWA Portion of the RCRA Permit for the Treatment, Storage, and
26 Disposal of Hazardous Waste (HSWA Permit) issued by EPA, Region 10, pursuant to
27 42 U.S.C. 6901 et seq. and 40 CFR Parts 124 and 270.
- 28 p. The term "**Reasonable Times**" means normal business hours; hours during which production,
29 treatment, storage, construction, disposal, or discharge occurs, or times when Ecology suspects a
30 violation requiring immediate inspection.
- 31 q. The term "**Release**" means any intentional or unintentional spilling, leaking, pouring, emitting,
32 emptying, discharging, injecting, pumping, escaping, leaching, dumping, or disposing of dangerous
33 constituents into the environment and includes the abandonment or discarding of barrels, containers,
34 and other receptacles containing dangerous waste or dangerous constituents, and includes any
35 releases within the meaning of release at RCW 70.105D.020(20).
- 36 r. The term "**Significant Discrepancy**" in regard to a manifest or shipping paper, means a discrepancy
37 between the quantity or type of dangerous waste designated on the manifest, or shipping paper, and
38 the quantity or type of dangerous waste a TSD unit actually receives. A significant discrepancy in
39 quantity is a variation greater than ten (10) percent in weight for bulk quantities (e.g., tanker trucks,
40 railroad tank cars, etc.), or any variation in piece count for nonbulk quantities (i.e., any missing
41 container or package would be a significant discrepancy). A significant discrepancy in type is an
42 obvious physical or chemical difference which can be discovered by inspection or waste analysis
43 (e.g., waste solvent substituted for waste acid).

- 1 s. The term "**Solid Waste Management Unit (SWMU)**" means any discernible location at the Facility
2 where solid wastes have been placed at any time, irrespective of whether the location was intended
3 for the management of solid or dangerous waste, and includes any area at the Facility at which solid
4 wastes have been routinely and systematically released (for example through spills), and includes
5 dangerous waste treatment, storage, and disposal units.
- 6 t. The term "**Unit**" or "**TSD unit**", as used in Parts I through VI of this Permit, means the contiguous
7 area of land on or in which dangerous waste is placed, or the largest area in which there is a
8 significant likelihood of mixing dangerous waste constituents in the same area. A TSD unit, for
9 purposes of this Permit, is a subgroup of the Facility which has been identified in a Hanford Facility
10 Dangerous Waste Part A Form.

ACRONYMS

1		
2	ALARA	As Low As Reasonably Achievable
3	AMSF	Alkali Metal Storage Facility
4	APDS	Ash Pit Demolition Site
5	APP	Used to Denote Appendix Page Numbers
6	APT	Area Process Trenches
7	ARAR	Applicable, Relevant, and Appropriate Requirements
8	BNI	Bechtel National, Inc
9	BPDS	Borrow Pit Demolition Site
10	CD/RR	Chemical Disposal/Recycle Request
11	CERCLA	Comprehensive Environmental Response Compensation and Liability
12		Act of 1980 (as Amended by the Superfund Reauthorization Act of
13		1986)
14	CFR	Code of Federal Regulations
15	CH2MHILL	CH2M HILL Hanford Group, Inc.
16	CIP	Construction Inspection Plan
17	CLARC	Cleanup Levels and Risk Calculations
18	CLP	Contract Laboratory Program
19	COC	Chemical Contaminants of Concern
20	CPP	CERCLA Past Practice
21	USDOE-RL	U.S. Department of Energy, Richland Operations Office
22	USDOE-ORP	U.S. Department of Energy, Office of River Protection
23	DQO	Data Quality Objective
24	DSC	Differential Scanning Colorimetry
25	EC	Emergency Coordinator
26	Ecology	Washington State Department of Ecology
27	EPA	U.S. Environmental Protection Agency
28	ERA	Expedited Response Action
29	ETF	200 Area Effluent Treatment Facility
30	<u>HFFACO</u>	Hanford Federal Facility Agreement and Consent Order
31	FH	Fluor Hanford, Inc.
32	GW	Ground Water
33	HPADS	Hanford Patrol Academy Demolition Site
34	HSWA	Hazardous and Solid Waste Amendments of 1984
35	HWMA	Hazardous Waste Management Act
36	ID	Identification
37	IRM	Interim Remedial Measure
38	LDR	Land Disposal Restrictions
39	LERF	Liquid Effluent Retention Facility
40	LSFF	105-DR Large Sodium Fire Facility
41	MTCA	Model Toxics Control Act

1	OSWER	Office of Solid Waste and Emergency Response
2	PNNL	Pacific Northwest National Laboratory
3	QA	Quality Assurance
4	QAPP	Quality Assurance Project Plan
5	QC	Quality Control
6	RCRA	Resource Conservation and Recovery Act of 1976
7	RCW	Revised Code of Washington
8	ROD	Record of Decision
9	RPD	Relative Percent Difference
10	RPP	RCRA Past Practice
11	SAP	Sampling and Analysis Plan
12	SARA	Superfund Amendments and Reauthorization Act of 1986
13	SCD	Security Control Devices
14	SHLWS	Simulated High Level Waste Slurry
15	SOP	Standard Operating Procedure
16	SWMU	Solid Waste Management Unit
17	TCLP	Toxicity Characteristic Leaching Procedure
18	TSD	Treatment, Storage, and/or Disposal
19	USDOE	United States Department of Energy
20	U.S.C.	United States Code
21	WAC	Washington Administrative Code
22	WAP	Waste Analysis Plan
23	WCH	Washington Closure Hanford
24	WTP	Waste Treatment and Immobilization Plant
25	183-H	183-H Solar Evaporation Basins
26	242-A	242-A Evaporator
27	300 APT	300 Area Process Trenches
28	300 ASE	300 Area Solar Evaporator
29	303-K	303-K Storage Facility
30	305-B	305-B Storage Facility
31	325 HWTUs	325 Hazardous Waste Treatment Units
32	616-NRDWSF	616 Nonradioactive Dangerous Waste Storage Facility

PART I STANDARD CONDITIONS

I.A EFFECT OF PERMIT

I.A.1 The Permittees are authorized to treat, store, and dispose of dangerous waste in accordance with the Conditions of this Permit and in accordance with the applicable provisions of Chapter 173-303 WAC (including provisions of the Chapter as they have been applied in the HFFACO). Any treatment, storage, or disposal of dangerous waste by the Permittees at the Facility that is not authorized by this Permit, or by WAC 173-303-400 (including provisions of this regulation as they have been applied in the HFFACO), for those TSD units not subject to this Permit, and for which a Permit is required by Chapter 173-303 WAC, is prohibited.

TSD units operating or closing under interim status will maintain interim status until that TSD unit is incorporated into Part III, V, and/or VI of this Permit, or until interim status is terminated under WAC 173-303-805(8). Interim status units will be incorporated into this Permit through the Permit modification process.

I.A.2 The Conditions of this Permit will be applied to the Facility as defined by the Permit Applicability Matrix (Permit Attachment 3).

I.A.3 USDOE is responsible for activities which include, but are not limited to, the overall management and operation of the Facility.

FH 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.

PNNL 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.

WCH 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.

CH2MHILL 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.

BNI 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.

I.A.4 Coordination with the HFFACO

Each TSD unit will have an application for a final status Permit or closure/post-closure plan submitted to Ecology in accordance with the schedules identified in the HFFACO Milestone M-20-00 or in accordance with WAC 173-303-830. After completion of the Permit application or closure/post-closure plan review, a final Permit decision will be made pursuant to WAC 173-303-840. Specific Conditions for each TSD unit will be incorporated into this Permit in accordance with the Class 3 Permit modification procedure identified in Permit Condition I.C.3.

1 **I.B PERSONAL AND PROPERTY RIGHTS**

2 This Permit does not convey property rights of any sort, or any exclusive privilege; nor
3 does it authorize any injury to persons or property, or any invasion of other private
4 rights, or any violation of federal, state, or local laws or regulations.

5 **I.C PERMIT ACTIONS**

6 **I.C.1 Modification, Revocation, Reissuance, or Termination**

7 This Permit may be modified, revoked and reissued, or terminated by Ecology for cause
8 per WAC 173-303-810(7) as specified in WAC 173-303-830(3), (4), and (5).

9 **I.C.2 Filing of a Request**

10 The filing of a request for a Permit modification, or revocation and reissuance, or
11 termination, or a notification of planned changes, or anticipated noncompliance on the
12 part of the Permittees, will not stay any Permit condition [WAC 173-303-810(7)]except
13 as provided in WAC 173-303-810(2) under an emergency permit.

14 **I.C.3 Modifications**

15 Except as provided otherwise by specific language in this Permit, the Permit
16 modification procedures of WAC 173-303-830(2), (3), and (4) will apply to
17 modifications or changes in design or operation of the Facility, or any modification or
18 change in dangerous waste management practices covered by this Permit. As an
19 exception, the Permittees will provide notifications to Ecology required by
20 WAC 173-303-830(4)(a)(i)(A) on a quarterly basis. Each quarterly notification will be
21 submitted within ten (10) days of the end of the quarter, and provide the required
22 information for all such modification s put into effect during that reporting period.
23 Quarterly reporting periods will be based upon the state Fiscal Year. For notifications
24 required by the Permittees to persons on the facility mailing list described in
25 WAC 173-303-830(4)(a)(i)(B), -830(4)(b)(ii), -830(4)(c)(ii), and -830(4)(e)(ii)(C), use of
26 appropriate HFFACO Community Relations Plan publications and/or list servers for
27 public involvement satisfy the notification requirements.

28 **I.D SEVERABILITY**

29 **I.D.1 Effect of Invalidation**

30 The provisions of this Permit are severable, and if any provision of this Permit, or the
31 application of any provision of this Permit to any circumstance is contested and/or held
32 invalid, the application of such provision to other circumstances and the remainder of
33 this Permit will not be affected thereby. Invalidation of any state statutory or regulatory
34 provision which forms the basis for any Condition of this Permit does not affect the
35 validity of any other state statutory or regulatory basis for said Condition.

36 **I.D.2 Final Resolution**

37 In the event that a Condition of this Permit is stayed for any reason, the Permittees will
38 continue to comply with the related applicable and relevant interim status standards in
39 WAC 173-303-400 until final resolution of the stayed Condition, unless Ecology
40 determines compliance with the related applicable and relevant interim status standards
41 would be technologically incompatible with compliance with other Conditions of this
42 Permit, which have not been stayed, or unless the HFFACO authorizes an alternative
43 action, in which case the Permittees will comply with the HFFACO.

1 **I.E DUTIES AND REQUIREMENTS**

2 I.E.1 Duty to Comply

3 The Permittees will comply with all Conditions of this Permit, except to the extent and
4 for the duration such noncompliance is authorized by an emergency Permit issued under
5 WAC 173-303-804. Any Permit noncompliance other than noncompliance authorized by
6 an emergency Permit constitutes a violation of Chapter 70.105 RCW, as amended, and is
7 grounds for enforcement action, Permit termination, modification or revocation and
8 reissuance of the Permit, and/or denial of a Permit renewal application.

9 I.E.2 Compliance Not Constituting Defense

10 Compliance with the terms of this Permit does not constitute a defense to any order
11 issued or any action brought under Section 3007, 3008, 3013, or 7003 of RCRA
12 (42 U.S.C. Sections 6927, 6928, 6934, and 6973), Section 104, 106(a) or 107 of the
13 Comprehensive Environmental Response, Compensation, and Liability Act of 1980
14 (CERCLA) [42 U.S.C. Sections 9604, 9606(a), and 9607], as amended by the Superfund
15 Amendments and Reauthorization Act of 1986 (42 U.S.C. 9601 et seq.), or any other
16 federal, state, or local law governing protection of public health, or the environment;
17 provided, however, that compliance with this Permit during its term constitutes
18 compliance at those areas subject to this Permit for the purpose of enforcement with
19 WAC 173-303-140, WAC 173-303-180, WAC 173-303-280 through -395,
20 WAC 173-303-600 through -680, WAC 173-303-810, and WAC 173-303-830, except for
21 Permit modifications and those requirements not included in the Permit that become
22 effective by statute, or that are promulgated under 40 CFR Part 268 restricting the
23 placement of dangerous waste in or on the land.

24 I.E.3 Duty to Reapply

25 If the Permittees wish to continue an activity regulated by this Permit after the expiration
26 date of this Permit, the Permittees must apply for, and obtain a new Permit, in
27 accordance with WAC 173-303-806(6).

28 I.E.4 Permit Expiration and Continuation

29 This Permit, and all Conditions herein, will remain in effect beyond the Permit's
30 expiration date until the effective date of the new Permit, if the Permittees have
31 submitted a timely, complete application for renewal per WAC 173-303-806 and,
32 through no fault of the Permittees, Ecology has not made a final Permit determination as
33 set forth in WAC 173-303-840.

34 I.E.5 Need to Halt or Reduce Activity Not a Defense

35 It will not be a defense in the case of an enforcement action that it would have been
36 necessary to halt or reduce the permitted activity in order to maintain compliance with
37 the Conditions of this Permit.

38 I.E.6 Duty to Mitigate

39 In the event of noncompliance with the Permit, the Permittees will take all reasonable
40 steps to minimize releases to the environment, and will carry out such measures as are
41 reasonable to minimize or correct adverse impacts on human health and the environment.

- 1 I.E.7 Proper Operation and Maintenance
2 The Permittees will at all times properly operate and maintain all facilities and systems
3 of treatment and control, which are installed or used by the Permittees, to achieve
4 compliance with the Conditions of this Permit. Proper operation and maintenance
5 includes effective performance, adequate funding, adequate operator staffing and
6 training, and adequate laboratory and process controls, including appropriate quality
7 assurance/quality control procedures. This provision requires the operation of backup or
8 auxiliary facilities, or similar systems only when necessary to achieve compliance with
9 the Conditions of the Permit.
- 10 I.E.8 Duty to Provide Information
11 The Permittees will furnish to Ecology, within a reasonable time, any relevant
12 information which Ecology may request to determine whether cause exists for
13 modifying, revoking and reissuing, or terminating this Permit, or to determine
14 compliance with this Permit. The Permittees will also furnish to Ecology, upon request,
15 copies of records required to be kept by this Permit.
- 16 I.E.9 Inspection and Entry
17 The Permittees will allow Ecology, or authorized representatives, upon the presentation
18 of Ecology credentials, to:
19 I.E.9.a During operating hours, and at all other reasonable times, enter and inspect the Facility
20 or any unit or area within the Facility, where regulated activities are located or
21 conducted, or where records must be kept under the Conditions of this Permit;
22 I.E.9.b Have access to, and copy, at reasonable times, any records that must be kept under the
23 Conditions of this Permit;
24 I.E.9.c Inspect at reasonable times any portion of the Facility, equipment (including monitoring
25 and control equipment), practices, or operations regulated or required under this Permit;
26 and,
27 I.E.9.d Sample or monitor, at reasonable times, for the purposes of assuring Permit compliance,
28 or as otherwise authorized by state law, as amended, for substances or parameters at any
29 location.
- 30 I.E.10 Monitoring and Records
31 I.E.10.a Samples and measurements taken by the Permittees for the purpose of monitoring
32 required by this Permit will be representative of the monitored activity. Sampling
33 methods will be in accordance with WAC 173-303-110 or 40 CFR 261, unless otherwise
34 specified in this Permit, or agreed to in writing by Ecology. Analytical methods will be
35 as specified in the most recently published test procedure of the documents cited in
36 WAC 173-303-110(3)(a) through (h), unless otherwise specified in this Permit, or agreed
37 to in writing by Ecology.
- 38 I.E.10.b The Permittees will retain at the TSD unit(s), or other locations approved by Ecology, as
39 specified in Parts III, V, and/or VI of this Permit, records of monitoring information
40 required for compliance with this Permit, including calibration and maintenance records
41 and all original strip chart recordings for continuous monitoring instrumentation, copies
42 of reports and records required by this Permit, and records of data used to complete the
43 application for this Permit for a period of at least ten (10) years from the date of the
44 sample, measurement, report, or application, unless otherwise required for certain

- 1 information by other Conditions of this Permit. This information may be retained on
2 electronic media.
- 3 I.E.10.c The Permittees will retain at the Facility, or other approved location, records of all
4 monitoring and maintenance records, copies of all reports and records required by this
5 Permit, and records of all data used to complete the application for this Permit, which are
6 not associated with a particular TSD unit, for a period of at least ten (10) years from the
7 date of certification of completion of post-closure care, or corrective action for the
8 Facility, whichever is later. This information may be retained on electronic media.
- 9 I.E.10.d The record retention period may be extended by request of Ecology at any time by
10 notification, in writing, to the Permittees, and is automatically extended during the
11 course of any unresolved enforcement action regarding this Facility to ten (10) years
12 beyond the conclusion of the enforcement action.
- 13 Records of monitoring information shall include:
- 14 I.E.10.d.i The date, exact place and time of sampling or measurements;
- 15 I.E.10.d.ii The individual who performed the sampling or measurements and their affiliation;
- 16 I.E.10.d.iii The dates the analyses were performed;
- 17 I.E.10.d.iv The individual(s) who performed the analyses and their affiliation;
- 18 I.E.10.d.v The analytical techniques or methods used; and,
- 19 I.E.10.d.vi The results of such analyses
- 20 I.E.11 Reporting Planned Changes
- 21 The Permittees will give notice to Ecology, as soon as possible, of any planned physical
22 alterations, or additions to the Facility subject to this Permit. Such notice does not
23 authorize any noncompliance with, or modification of, this Permit.
- 24 I.E.12 Certification of Construction or Modification
- 25 I.E.12.a The Permittees may not commence treatment, storage, or disposal of dangerous wastes in
26 a new or modified portion of TSD units subject to this Permit until:
- 27 I.E.12.b The Permittees have submitted to Ecology, by certified mail, overnight express mail, or
28 hand delivery, a letter signed by the Permittees, and a registered professional engineer,
29 stating that the TSD unit has been constructed or modified in compliance with the
30 Conditions of this Permit; and,
- 31 I.E.12.c Ecology has inspected the modified or newly constructed TSD unit, and finds that it is in
32 compliance with the Conditions of this Permit; or
- 33 I.E.12.d Within fifteen (15) days of the date of receipt of the Permittees' letter, the Permittees
34 have not received notice from Ecology of its intent to inspect, prior inspection is waived,
35 and the Permittees may commence treatment, storage, and disposal of dangerous waste.
- 36 I.E.13 Anticipated Noncompliance
- 37 The Permittees will give at least thirty (30) days advance notice to Ecology of any
38 planned changes in the Facility subject to this Permit, or planned activity which might
39 result in noncompliance with Permit requirements.
- 40 If thirty (30) days advance notice is not possible, then the Permittees will give notice
41 immediately after the Permittees become aware of the anticipated noncompliance. Such
42 notice does not authorize any noncompliance with, or modification of, this Permit.

- 1 I.E.14 Transfer of Permits
- 2 I.E.14.a This Permit may be transferred to a new owner/operator only if it is modified, or revoked
3 and reissued, pursuant to WAC 173-303-830(3)(b). Unit-specific portion may be
4 transferred to a new Co-operator as a Class ¹ modification with prior approval of the
5 Department's director.
- 6 I.E.14.b Before transferring ownership or operation of the Facility during its operating life, the
7 owner/operator will notify the new owner/operator in writing, of the requirements of
8 WAC 173-303-290(2), -600 and -806, and this Permit.
- 9 I.E.15 Immediate Reporting
- 10 I.E.15.a The Permittees will verbally report to Ecology any release of dangerous waste or
11 hazardous substances, or any noncompliance with the Permit which may endanger
12 human health or the environment. Any such information will be reported immediately
13 after the Permittees become aware of the circumstances.
- 14 I.E.15.b The immediate verbal report will contain all the information needed to determine the
15 nature and extent of any threat to human health and the environment, including the
16 following:
- 17 I.E.15.b.i Name, address, and telephone number of the Permittee responsible for the release or
18 noncompliant activity;
- 19 I.E.15.b.ii Name, location, and telephone number of the unit at which the release occurred;
- 20 I.E.15.b.iii Date, time, and type of incident;
- 21 I.E.15.b.iv Name and quantity of material(s) involved;
- 22 I.E.15.b.v The extent of injuries, if any;
- 23 I.E.15.b.vi An assessment of actual or potential hazard to the environment and human health, where
24 this is applicable;
- 25 I.E.15.b.vii Estimated quantity of released material that resulted from the incident; and,
- 26 I.E.15.b.viii Actions which have been undertaken to mitigate the occurrence.
- 27 I.E.15.c The Permittees will report, in accordance with Permit Conditions I.E.15.a and I.E.15.b,
28 any information concerning the release, or unpermitted discharge, of any dangerous
29 waste or hazardous substances that may cause an endangerment to drinking water
30 supplies, or ground or surface waters, or of a release, or discharge of dangerous waste, or
31 hazardous substances, or of a fire or explosion at the Facility, which may threaten human
32 health or the environment. The description of the occurrence and its cause will include
33 all information necessary to fully evaluate the situation and to develop an appropriate
34 course of action.
- 35 I.E.15.d For any release or noncompliance not required to be reported to Ecology immediately, a
36 brief account must be entered within two (2) working days, into the TSD Operating
37 Record, for a TSD unit, or into the Facility Operating Record, inspection log, or separate
38 spill log, for non-TSD units. This account must include: the time and date of the release,
39 the location and cause of the release, the type and quantity of material released, and a
40 brief description of any response actions taken or planned.
- 41 I.E.15.e All releases, regardless of location of release, or quantity of release, will be controlled
42 and mitigated, if necessary, as required by WAC 173-303-145(3).

- 1 I.E.16 Written Reporting
- 2 Within fifteen (15) days after the time the Permittees become aware of the circumstances
3 of any noncompliance with this Permit, which may endanger human health or the
4 environment, the Permittees will provide to Ecology a written report. The written report
5 will contain a description of the noncompliance and its cause (including the information
6 provided in the verbal notification); the period of noncompliance including exact dates
7 and times; the anticipated time noncompliance is expected to continue, if the
8 noncompliance has not been corrected; corrective measures being undertaken to mitigate
9 the situation, and steps taken or planned to reduce, eliminate, and prevent recurrence of
10 the noncompliance.
- 11 I.E.17 Manifest Discrepancy Report
- 12 I.E.17.a For dangerous waste received from outside the Facility, whenever a significant
13 discrepancy in a manifest is discovered, the Permittees will attempt to reconcile the
14 discrepancy. If not reconciled within fifteen (15) days of discovery, the Permittees will
15 submit a letter report in accordance with WAC 173-303-370(4), including a copy of the
16 applicable manifest or shipping paper, to Ecology.
- 17 I.E.17.b For dangerous waste which is being transported within the Facility (i.e., shipment of on-
18 site generated dangerous waste), whenever a significant discrepancy in the shipping
19 papers (see Permit Condition II.Q.1) is discovered, the Permittees will attempt to
20 reconcile the discrepancy. If not reconciled within fifteen (15) days of discovery, the
21 Permittees will note the discrepancy in the receiving unit's Operating Record.
- 22 I.E.18 Unmanifested Waste Report
- 23 The Permittees will follow the provisions of WAC 173-303-370 for the receipt of any
24 dangerous waste shipment from off-site. The Permittees will also submit a report in
25 accordance with WAC 173-303-390(1) to Ecology within fifteen (15) days of receipt of
26 any unmanifested dangerous waste shipment received from off-site sources.
- 27 I.E.19 Other Noncompliance
- 28 The Permittees will report to Ecology all instances of noncompliance, not otherwise
29 required to be reported elsewhere in this Permit, at the time the Annual Dangerous Waste
30 Report is submitted.
- 31 I.E.20 Other Information
- 32 Whenever the Permittees become aware that they have failed to submit any relevant facts
33 in a Permit application, closure plan, or post-closure plan, or submitted incorrect
34 information in a Permit application, closure plan, or post-closure plan, or in any report to
35 Ecology, the Permittees will promptly submit such facts or corrected information.
- 36 I.E.21 Reports, Notifications, and Submissions
- 37 All written reports, notifications or other submissions, which are required by this Permit
38 to be sent, or given to the Director or Ecology, should be sent certified mail, overnight
39 express mail, or hand delivered, to the current address and telephone number shown
40 below. This address and telephone number may be subject to change.

1 Washington State Department of Ecology
2 Nuclear Waste Program
3 3100 Port of Benton Blvd
4 Richland, Washington 99354
5 Telephone: (509) 372-7950

6 Telephonic and oral reports/notifications also need to be provided to Ecology's Richland
7 Office.

8 Ecology will give the Permittees written notice of a change in address or telephone
9 number. It is the responsibility of the Permittees to ensure any required reports,
10 notifications, or other submissions are transmitted to the addressee listed in this
11 Condition. However, the Permittees will not be responsible for ensuring verbal and
12 written correspondence reaches a new address or telephone number until after their
13 receipt of Ecology's written notification.

14 **I.E.22** Annual Report

15 The Permittees will comply with the annual reporting requirements of
16 WAC 173-303-390(2)(a) through (e), and (g).

17 **I.F** **SIGNATORY REQUIREMENT**

18 All applications, reports, or information submitted to Ecology, which require
19 certification, will be signed and certified in accordance with WAC 173-303-810(12) and
20 (13). All other reports required by this Permit and other information requested by
21 Ecology will be signed in accordance with WAC 173-303-810(12).

22 **I.G** **CONFIDENTIAL INFORMATION**

23 The Permittees may declare as confidential any information required to be submitted by
24 this Permit, at the time of submission, in accordance with WAC 173-303-810(15).

25 **I.H** **DOCUMENTS TO BE MAINTAINED AT FACILITY SITE**

26 The Permittees will maintain at the Facility, or some other location approved by
27 Ecology, the following documents and amendments, revisions, and modifications to
28 these documents: (1) This Permit and all Attachments; and (2) The Hanford Facility
29 Operating Record.

30 All dangerous waste Part B permit applications, post closure permit applications, and
31 closure plan applications are maintained in the Administrative Record located at
32 2440 Stevens, Room 1101, Richland, WA.

33 Other approved locations: (1) 700 Area, (2) Locations within the City of Richland under
34 control of one or more of the Permittees, (3) Administrative Record locations within the
35 Stevens Center complex, (4) Consolidated Information Center at Washington State
36 University, Tri-Cities. (5) Archived records at the National Archives and Records
37 Administration (NARA), Pacific Alaska Region, 6125 Sand Point Way NE, Seattle,
38 Washington, 98115-7999.

39 These documents will be maintained for ten (10) years after post-closure care or
40 corrective action for the Facility, whichever is later, has been completed and certified as
41 complete.

PART II GENERAL FACILITY CONDITIONS

II.A FACILITY CONTINGENCY PLAN

II.A.1 The Permittees will immediately carry out applicable provisions of the *Hanford Emergency Management Plan* as provided in Permit Attachment 4, pursuant to WAC 173-303-360(2), whenever there is an incident meeting the criteria of Permit Attachment 4, Section 4.2. Enforceable portions of Permit Attachment 4, *Hanford Emergency Management Plan* (DOE/RL-94-02) are identified in Permit Attachment 4, Appendix A.

II.A.2 The Permittees will comply with the requirements of WAC 173-303-350(4), as provided in the *Hanford Emergency Management Plan* (Permit Attachment 4). The *Hanford Emergency Management Plan* provides reference to the need for unit-specific contingency documentation. Unit-specific contingency documentation for Part III TSD units is included in Part III of this Permit. Unit-specific contingency documentation for Part V and VI TSD units required by this Permit condition is maintained in the Hanford Facility Operating Record, Unit-Specific files.

II.A.3 The Permittees will review and amend, if necessary, the applicable portions of the *Hanford Emergency Management 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 Permittees will be able to demonstrate how Amendments to the applicable portions are controlled. The plan will be amended within a period of time agreed upon by Ecology.

II.A.4 The Permittees will 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 (for PNNL units) as described in the *Hanford Emergency Management Plan*.

II.B PREPAREDNESS AND PREVENTION

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

II.B.2 The Permittees will test and maintain the equipment specified in Permit Condition II.B.1 as necessary to assure proper operation in the event of emergency.

II.B.3 The Permittees will maintain access to communications or alarms pursuant to WAC 173-303-340(2), as provided in the *Hanford Emergency Management Plan* (Permit Attachment 4) and unit-specific contingency plans.

II.B.4 The Permittees will comply with WAC 173-303-340(4) and WAC 173-303-355(1) pertaining to arrangements with local authorities.

II.B.5 Based on the arrangements with local authorities required by WAC 173-303-340(4) documented in Permit Attachment 4, Table 3-1, the Permittees will maintain the Memorandums of Understanding to comply with WAC 173-303-350(4)(b). The Hanford Facility Memorandums of Understanding with local authorities provides emergency planning and coordination equivalent to submittal of the contingency plan to local authorities

1 **II.C PERSONNEL TRAINING**

2 II.C.1 The Permittees will conduct personnel training as required by WAC 173-303-330. The
3 Permittees will maintain documents in accordance with WAC 173-303-330(2) and (3).
4 Training records may be maintained in the Hanford Facility Operating Record, or on
5 electronic data storage.

6 II.C.2 All Hanford Facility personnel will receive general Facility training within six (6)
7 months of hire. This training will provide personnel with orientation of dangerous waste
8 management activities being conducted at the Hanford Facility. This training will
9 include:

10 II.C.2.a Description of emergency signals and appropriate personnel response;

11 II.C.2.b Identification of contacts for information regarding dangerous waste management
12 activities;

13 II.C.2.c Introduction to waste minimization concepts;

14 II.C.2.d Identification of contact(s) for emergencies involving dangerous waste; and

15 II.C.2.e Familiarization with the applicable portions of the *Hanford Emergency Management*
16 *Plan*.

17 II.C.3 Description of training plans for personnel assigned to TSD units subject to this Permit
18 are delineated in the unit-specific Chapters in Parts III, V, and/or VI of this Permit.

19 II.C.4 The Permittees will provide the necessary training to non-Facility personnel (i.e.,
20 visitors, sub-contractors), as appropriate, for the locations of such personnel, and the
21 activities that will be undertaken. At a minimum, this training will describe dangerous
22 waste management hazards at the Facility.

23 **II.D WASTE ANALYSIS**

24 II.D.1 All waste analyses required by this Permit will be conducted in accordance with a
25 written waste analysis plan (WAP), or sampling and analysis plan (SAP). Operating
26 TSD units will have a WAP, which will be approved through incorporation of the TSD
27 unit into Part III of this Permit. Closing TSD units, and units in post-closure, should
28 have a SAP and, if necessary, a WAP, which will be approved through incorporation of
29 the TSD unit into Part V and/or VI of this Permit.

30 II.D.2 Until a WAP is implemented in accordance with Permit Condition II.D.1., any unit(s)
31 identified in Parts III, V, and/or VI of this Permit, without a unit-specific WAP approved
32 by Ecology, will not treat, store, or dispose of dangerous waste, unless specified
33 otherwise by Ecology in writing.

34 II.D.3 Each TSD unit WAP will include:

35 II.D.3.a The parameters for which each dangerous waste will be analyzed, and the rationale for
36 selecting these parameters; (i.e., how analysis for these parameters will provide sufficient
37 information on the waste properties to comply with WAC 173-303-300(1), (2), (3), and
38 (4);

39 II.D.3.b The methods of obtaining or testing for these parameters;

40 II.D.3.c The methods for obtaining representative samples of wastes for analysis (representative
41 sampling methods are discussed in WAC 173-303-110(2);

- 1 II.D.3.d The frequency with which analysis of a waste will be reviewed, or repeated, to ensure
2 that the analysis is accurate and current;
- 3 II.D.3.e The waste analyses which generators have agreed to supply;
- 4 II.D.3.f Where applicable, the methods for meeting the additional waste analysis requirements
5 for specific waste management methods, as specified in WAC 173-303-140(4)(b),
6 173-303-395(1), 173-303-630 through 173-303-670, and 40 CFR 264.1034, 264.1063,
7 284(a), and 268.7, for final status facilities;
- 8 II.D.3.f.i For off-site facilities, the procedures for confirming that each dangerous waste received
9 matches the identity of the waste specified on the accompanying manifest, or shipping
10 paper. This includes at least:
- 11 II.D.3.f.i.1 The procedure for identifying each waste movement at the Facility; and,
- 12 II.D.3.f.i.2 The method for obtaining a representative sample of the waste to be identified, if the
13 identification method includes sampling.
- 14 II.D.3.f.ii For surface impoundments exempted from Land Disposal Restrictions (LDR) under
15 40 CFR 268.4(a), incorporated by reference in WAC 173-303-140(2), the procedures and
16 schedules for:
- 17 1. The sampling of impoundment contents;
 - 18 2. The analysis of test data; and
 - 19 3. The annual removal of residues that are not delisted under 40 CFR 260.22, or which
20 exhibit a characteristic of hazardous waste and either;
 - 21 a. Do not meet applicable treatment standards of 40 CFR Part 268, Subpart D; or
 - 22 b. Where no treatment standards have been established:
 - 23 i) Such residues are prohibited from land disposal under 40 CFR 268.32, or
 - 24 RCRA Section 3004(d); or
 - 25 ii) Such residues are prohibited from land disposal under 40 CFR 268.33(f); and
- 26 II.D.3.f.iii For off-site facilities, the procedures for confirming that each dangerous waste received
27 matches the identity of the waste specified on the accompanying manifest, or shipping
28 paper. This includes, at least:
- 29 II.D.3.f.i.3 The procedure for identifying each waste movement at the Facility; and
- 30 II.D.3.f.i.4 The method for obtaining a representative sample of the waste to be identified, if the
31 identification method includes sampling.
- 32 II.D.4 Should waste analysis be required by this Permit at a location on the Facility, other than
33 at a TSD unit, a SAP will be maintained by the Permittees, and made available upon
34 request from Ecology. Any SAP required by this Permit, not associated with a particular
35 TSD unit, will include the elements of Permit Conditions II.D.3.a.i through II.D.3.a.iv.
- 36 **II.E QUALITY ASSURANCE/QUALITY CONTROL**
- 37 II.E.1 All WAPs and SAPs required by this Permit will include a quality assurance/quality
38 control (QA/QC) plan, or equivalent, to document all monitoring procedures to ensure
39 that all information, data, and resulting decisions are technically sound, statistically
40 valid, and properly documented in accordance with HFFACO Action Plan §6.5, Quality
41 Assurance, and reported/made available in accordance with HFFACO Action Plan §9.6,
42 Data Access and Delivery Requirements.

1 II.E.2 The level of QA/QC for the collection, preservation, transportation, and analysis of each
2 sample required for implementation of this Permit may be based upon an Ecology-
3 approved DQO for the sample. These DQOs will be approved by Ecology in writing or
4 through incorporation of unit plans and Permits into Parts III, V, and/or VI of this Permit.

5 **II.F GROUND WATER AND VADOSE ZONE MONITORING**

6 The Permittees will comply with the ground water monitoring requirements of
7 WAC 173-303-645. This Condition will apply only to those wells the Permittees use for
8 the ground water monitoring programs applicable to the TSD units incorporated into
9 Parts III, V, and/or VI of this Permit. Where releases from TSD units subject to this
10 Permit have been documented or confirmed by investigation, or where vadose zone
11 monitoring is proposed for integration with ground water monitoring, the Permittees will
12 evaluate the applicability of vadose zone monitoring. The Permittees will consult with
13 Ecology regarding the implementation of these requirements. If agreed to by Ecology,
14 integration of ground water and vadose zone monitoring, for reasons other than this
15 Permit, may be accommodated by this Permit. Results from other investigation activities
16 will be used whenever possible to supplement and/or replace sampling required by this
17 Permit.

18 II.F.1 Purgewater Management

19 Purgewater will be handled in accordance with the requirements set forth in Permit
20 Attachment 5, *Purgewater Management Plan*.

21 II.F.2 Well Remediation and Abandonment

22 II.F.2.a The Permittees will inspect the integrity of active resource protection wells as defined by
23 WAC 173-160-030, subject to this Permit, at least once every five (5) years. These
24 inspections will be recorded in the Operating Record. The Permittees will prepare and
25 maintain a plan and schedule by January 26, 1995, specifying the schedule and technical
26 standards for this program. The Permittees will provide a copy of this plan upon the
27 request of Ecology.

28 II.F.2.b The Permittees will evaluate resource protection wells subject to this Permit according to
29 Sections 4.0 and 5.0 of the *Hanford Well Maintenance Inspection Plan* (Permit
30 Attachment 6) and the *Policy on Remediation of Existing Wells and Acceptance Criteria*
31 *for RCRA and CERCLA*, June 1990 (Permit Attachment 7), to determine if a well has a
32 potential use as a qualified well. The Permittees will abandon or remediate unusable
33 wells according to the requirements of Chapter 18.104 RCW, Chapter 173-160 WAC,
34 and Chapter 173-162 WAC to ensure that the integrity of wells subject to this Permit is
35 maintained. The time for this remediation will be specified in Parts III, V, and/or VI of
36 this Permit.

37 II.F.2.c Ecology will receive notice in writing at least seventy-two (72) hours before the
38 Permittees remediate (excluding maintenance activities), or abandon any well subject to
39 this Permit.

40 II.F.2.d For wells subject to this Permit, the Permittees will achieve full compliance with
41 Chapter 173-160 WAC and Chapter 18.104 RCW consistent with a rolling five (5) year
42 schedule agreed to by Ecology and the Permittees. This process will be completed by the
43 year 2012.

- 1 II.F.3 Well Construction
2 All wells constructed pursuant to this Permit will be constructed in compliance with
3 Chapter 173-160 WAC.
- 4 II.G SITING CRITERIA
5 The Permittees will comply with the applicable notice of intent and siting criteria of
6 WAC 173-303-281 and WAC 173-303-282, respectively.
- 7 II.H RECORDKEEPING AND REPORTING
8 The provisions of WAC 173-303-620 are not applicable to the Hanford Facility because
9 the USDOE is both owner and operator of the Hanford Facility.
10 WAC 173-303-620(1)(c).
- 11 II.I FACILITY OPERATING RECORD
12 II.I.1 The Permittees will maintain a written Facility Operating Record until ten (10) years
13 after post-closure, or corrective action is complete and certified for the Facility,
14 whichever is later. Except as specifically provided otherwise in this Permit, the
15 Permittees will also record all information referenced in this Permit in the Facility
16 Operating Record within seven (7) working days after the information becomes
17 available. A TSD unit-specific Operating Record will be maintained for each TSD unit
18 at a location identified in Parts III, V, and VI of this Permit. This information may be
19 maintained on electronic media. Each TSD unit-specific Operating Record will be
20 included by reference in the Facility Operating Record. Information required in each
21 TSD unit-specific Operating Record is identified on a unit-by-unit basis in Part III, V, or
22 VI of this Permit. The Facility Operating Record will include, but not be limited to, the
23 following information.
- 24 II.I.1.a A description of the system(s) currently utilized to identify and map solid waste
25 management units and their locations. The description of the system(s) is required to
26 include an identification of on-site access to the system's data, and an on-site contact
27 name and telephone number. In addition to, or as part of, this system(s), the Permittees
28 will also maintain a list identifying active ninety (90)-day waste storage areas, and
29 dangerous waste satellite accumulation areas and their locations. The list will identify
30 the location, the predominant waste types managed at the area, and a date identifying
31 when the list was compiled. Maps will be provided by the Permittees upon request by
32 Ecology;
- 33 II.I.1.b Records and results of waste analyses required by WAC 173-303-300;
- 34 II.I.1.c An identification of the system(s) currently utilized to generate Occurrence Reports. The
35 identification of the system(s) is required to include a description, an identification of an
36 on-site location of hard-copy Occurrence Reports, an identification of on-site access to
37 the system's data, and an on-site contact name and telephone number;
- 38 II.I.1.d Copies of all unmanifested waste reports;
- 39 II.I.1.e The *Hanford Emergency Management Plan*, as well as summary reports, and details of
40 all incidents that require implementing the contingency plan, as specified in
41 WAC 173-303-360(2)(k);

- 1 II.I.1.f An identification of the system(s) currently utilized and being developed to record
2 personnel training records and to develop training plans. The identification of the
3 system(s) is required to include a description, an identification of on-site access to the
4 system's data, and an on-site contact name and telephone number;
- 5 II.I.1.g Preparedness and prevention arrangements made pursuant to WAC 173-303-340(4) and
6 documentation of refusal by state or local authorities that have declined to enter into
7 agreements in accordance with WAC 173-303-340(5);
- 8 II.I.1.h Reserved Condition;
- 9 II.I.1.i Reserved Condition;
- 10 II.I.1.j Documentation (e.g., waste profile sheets) of all dangerous waste transported to or from
11 any TSD unit subject to this Permit. This documentation will be maintained in the
12 receiving unit's Operating Record from the time the waste is received;
- 13 II.I.1.k An identification of the system(s) currently utilized to cross-reference waste locations to
14 specific manifest document numbers. The identification of the system(s) is required to
15 include a thorough description, an identification of an on-site location of a hard-copy
16 data report, an identification of on-site access to the system's data, and an on-site contact
17 name and telephone number;
- 18 II.I.1.l Reserved Condition;
- 19 II.I.1.m Annual Reports required by this Permit;
- 20 II.I.1.n An identification of all systems currently utilized to record monitoring information,
21 including all calibration and maintenance records, and all original strip chart recordings
22 for continuous monitoring instrumentation. The identification of systems will include a
23 description of the systems. The descriptions will include a confirmation that the criteria
24 of Permit Condition I.E.10.e is provided by the utilization of the system. The
25 identification of the systems will also include an identification of on-site access to the
26 system's data, an on-site contact name and telephone number;
- 27 II.I.1.o Reserved Condition;
- 28 II.I.1.p Summaries of all records of ground water corrective action required by
29 WAC 173-303-645;
- 30 II.I.1.q An identification of the system(s) currently being utilized and being developed to
31 evaluate compliance with the Conditions of this Permit and with Chapter 173-303 WAC.
32 The identification of the system(s) will include a description of the system(s), an
33 identification of on-site access to the system's data, and an on-site contact name and
34 telephone number. The description of the system(s) will also include a definition of
35 which portion(s) of the system(s) is accessible to Ecology;
- 36 II.I.1.r All deed notifications required by this Permit (to be included by reference);
- 37 II.I.1.s All inspection reports required by this Permit; and
- 38 II.I.1.t All other reports as required by this Permit, including design change documentation and
39 nonconformance documentation.

1 **II.J FACILITY CLOSURE**

2 II.J.1 Final closure of the Hanford Facility will be achieved when closure activities for all TSD
3 units have been completed, as specified in Parts III, IV, V, or VI of this Permit.
4 Completion of these activities will be documented using either certifications of closure,
5 in accordance with WAC 173-303-610(6), or certifications of completion of post-closure
6 care, in accordance with WAC 173-303-610(11).

7 II.J.2 The Permittees will close all TSD units as specified in Parts III, V, and/or VI of this
8 Permit.

9 II.J.3 The Permittees will submit a written notification of, or request for, a Permit modification
10 in accordance with the provisions of WAC 173-303-610(3)(b), whenever there is a
11 change in operating plans, facility design, or the approved closure plan. The written
12 notification or request must include a copy of the amended closure plan for review, or
13 approval, by Ecology.

14 II.J.4 The Permittees will close the Facility in a manner that:

15 II.J.4.a Minimizes the need for further maintenance;

16 II.J.4.b Controls, minimizes or eliminates, to the extent necessary to protect human health and
17 the environment, post-closure escape of dangerous waste, dangerous constituents,
18 leachate, contaminated run-off, or dangerous waste decomposition products, to the
19 ground, surface water, ground water, or the atmosphere; and

20 II.J.4.c Returns the land to the appearance and use of surrounding land areas to the degree
21 possible, given the nature of the previous dangerous waste activity.

22 II.J.4.d Meets the requirements of WAC 173-303-610(2)(b).

23 **II.K SOIL/GROUND WATER CLOSURE PERFORMANCE STANDARDS**

24 II.K.1 For purposes of Permit Condition II.K, the term "clean closure" shall mean the status of a
25 TSD unit at the Facility which has been closed to the cleanup levels prescribed by
26 WAC 173-303-610(2)(b), provided certification of such closure has been accepted by
27 Ecology.

28 II.K.2 The Permittees may close a TSD unit to background levels as defined in Ecology
29 approved Hanford Site Background Documents, if background concentrations exceed the
30 levels prescribed by Permit Condition II.K.1. Closure to these levels, provided the
31 Permittees comply with all other closure requirements for a TSD unit as identified in
32 Parts III, V, and/or VI of this Permit, shall be deemed as "clean closure".

33 II.K.3 Except for those TSD units identified in Permit Conditions II.K.1, II.K.2, or II.K.4, the
34 Permittees may close a TSD unit to a cleanup level specified under Method C of
35 Chapter 173-340 WAC. Closure of a TSD unit to these levels, provided the Permittees
36 comply with all other closure requirements for the TSD unit as specified in Parts III, V,
37 and/or VI of the Permit, and provided the Permittees comply with Permit
38 Conditions II.K.3.a through II.K.3.c, shall be deemed as a "modified closure".

39 II.K.3.a For "modified closures", the Permittees shall provide institutional controls in accordance
40 with WAC 173-340-440 which restricts access to the TSD unit for a minimum of
41 five (5) years following completion of closure. The specific details and duration of
42 institutional controls shall be specified in Parts III, V, and/or VI of this Permit for a
43 particular TSD unit.

- 1 II.K.3.b For "modified closures", the Permittees shall provide periodic assessments of the TSD
2 unit to determine the effectiveness of the closure. The specific details of the periodic
3 assessments shall be specified in Parts III, V, and/or VI of this Permit. The periodic
4 assessments shall include, as a minimum, a compliance monitoring plan in accordance
5 with WAC 173-340-410 that will address the assessment requirements on a unit-by-unit
6 basis. At least one (1) assessment activity shall take place after a period of five (5) years
7 from the completion of closure, which will demonstrate whether the soils and ground
8 water have been maintained at or below the allowed concentrations as specified in
9 Parts III, V, or VI of this Permit. Should the required assessment activities identify
10 contamination above the allowable limits as specified in Parts III, V, and/or VI, the TSD
11 unit must be further remediated, or the requirements of II.K.4 must be followed. Should
12 the required assessment activities demonstrate that contamination has diminished, or
13 remained the same, the Permittees may request that Ecology reduce, or eliminate the
14 assessment activities and/or institutional controls.
- 15 II.K.3.c For "modified closures", the Permittees shall specify the particular activities required by
16 this Condition in a Post-Closure Permit application.
- 17 II.K.4 Any TSD unit for which Permit Conditions II.K.1, II.K.2, or II.K.3, are not chosen as the
18 closure option, closing the TSD unit as a landfill may be selected. Closure and post-
19 closure of the TSD unit as a landfill, must follow the procedures and requirements
20 specified in WAC 173-303-610.
- 21 II.K.5 The cleanup option selected shall be specified in Parts III, V, and/or VI of this Permit,
22 and shall be chosen with consideration of the potential future site use for that TSD
23 unit/area. Definitions contained within Chapter 173-340 WAC shall apply to Permit
24 Condition II.K. Where definitions are not otherwise provided by this Permit, the
25 HFFACO, or Chapter 173-303 WAC.
- 26 II.K.6 Deviations from a TSD unit closure plan required by unforeseen circumstances
27 encountered during closure activities, which do not impact the overall closure strategy,
28 but provide equivalent results, shall be documented in the TSD unit-specific Operating
29 Record and made available to Ecology upon request, or during the course of an
30 inspection.
- 31 II.K.7 Where agreed to by Ecology, integration of other statutorily or regulatory mandated
32 cleanups may be accommodated by this Permit. Results from other cleanup investigation
33 activities shall be used whenever possible to supplement and/or replace TSD unit closure
34 investigation activities. All, or appropriate parts of, multipurpose cleanup and closure
35 documents can be incorporated into this Permit through the Permit modification process.
36 Cleanup and closures conducted under any statutory authority, with oversight by either
37 Ecology or the EPA, which meet the equivalent of the technical requirements of Permit
38 Conditions II.K.1 through II.K.4, may be considered as satisfying the requirements of
39 this Permit.
- 40 **II.L DESIGN AND OPERATION OF THE FACILITY**
- 41 II.L.1 Proper Design and Construction
- 42 The Permittees will design, construct, maintain, and operate the Facility to minimize the
43 possibility of a fire, explosion, or any unplanned sudden or non-sudden release of
44 hazardous substances to air, soil, ground water, or surface water, which could threaten
45 human health, or the environment.
- 46 II.L.2 Design Changes, Nonconformance, and As-Built Drawings

- 1 II.L.2.a After completing the Permit modification process in Permit Condition I.C.3, the
2 Permittees will conduct all construction subject to this Permit in accordance with the
3 approved designs, plans and specifications that are required by this Permit, unless
4 authorized otherwise in Permit Conditions II.L.2.b or II.L.2.c. For purposes of Permit
5 Conditions II.L.2.b and II.L.2.c, an Ecology construction inspector, or TSD unit
6 manager, are designated representatives of Ecology.
- 7 II.L.2.b During construction of a project subject to this Permit, changes to the approved designs,
8 plans and specifications will be formally documented. All design change documentation
9 will be maintained in the TSD unit-specific Operating Record and will be made available
10 to Ecology upon request or during the course of an inspection. The Permittees will
11 provide copies of design change documentation affecting any critical system to Ecology
12 within five (5) working days of initiating the design change documentation.
13 Identification of critical systems will be included by the Permittees in each TSD unit-
14 specific dangerous waste Permit application, closure plan or Permit modification, as
15 appropriate. Ecology will review a design change documentation modifying a critical
16 system, and inform the Permittees in writing within two (2) working days, whether the
17 proposed design change documentation, when issued, will require a Class 1, 2, or 3
18 Permit modification. If after two (2) working days Ecology has not responded, it will be
19 deemed as acceptance of the design change documentation by Ecology.
- 20 II.L.2.c During construction of a project subject to this Permit, any work completed which does
21 not meet or exceed the standards of the approved design, plans and specifications will be
22 formally documented with nonconformance documentation. All nonconformance
23 documentation will be maintained in the TSD unit-specific Operating Record and will be
24 made available to Ecology upon request, or during the course of an inspection. The
25 Permittees will provide copies of nonconformance documentation affecting any critical
26 system to Ecology within five (5) working days after identification of the
27 nonconformance. Ecology will review nonconformance documentation affecting a
28 critical system and inform the Permittees in writing, within two (2) working days,
29 whether a Permit modification is required for any nonconformance, and whether prior
30 approval is required from Ecology before work proceeds, which affects the
31 nonconforming item. If Ecology does not respond within two (2) working days, it will
32 be deemed as acceptance and no Permit modification will be required.
- 33 II.L.2.d Upon completion of a construction project subject to this Permit, the Permittees will
34 produce as-built drawings of the project which incorporate the design and construction
35 modifications resulting from all project design change documentation and
36 nonconformance documentation, as well as modifications made pursuant to
37 WAC 173-303-830. The Permittees will place the drawings into the Operating Record
38 within twelve (12) months of completing construction, or within an alternate period of
39 time specified in a unit-specific Permit Condition in Part III or V of this Permit.
- 40 II.L.2.e Facility Compliance
- 41 The Permittees in receiving, storing, transferring, handling, treating, processing, and
42 disposing of dangerous waste, will design, operate, and/or maintain the Facility in
43 compliance with all applicable federal, state, and local laws and regulations.
- 44 **II.M SECURITY**
- 45 The Permittees will comply with the security provisions of WAC 173-303-310. The
46 Permittees may comply with the requirements of WAC 173-303-310(2) on a unit-by-unit
47 basis.

1 **II.N RECEIPT OF DANGEROUS WASTES GENERATED OFF-SITE**

2 **II.N.1 Receipt of Off-Site Waste**

3 The Permittees will comply with Permit Conditions II.N.2 and II.N.3 for any dangerous
4 wastes which are received from sources outside the United States, or from off-site
5 generators.

6 **II.N.2 Waste from Sources Outside the United States**

7 The Permittees will meet the requirements of WAC 173-303-290(1) for waste received
8 from outside the United States.

9 **II.N.3 Notice to Generator**

10 For waste received from off-site sources (except where the owner/operator is also the
11 generator), the Permittees will inform the generator in writing that they have the
12 appropriate Permits for, and will accept, the waste the generator is shipping, as required
13 by WAC 173-303-290(3). The Permittees will keep a copy of this written notice as part
14 of the TSD unit-specific Operating Record.

15 **II.O GENERAL INSPECTION REQUIREMENTS**

16 **II.O.1** The Permittees will inspect the Facility to prevent malfunctions and deterioration,
17 operator errors, and discharges, which may cause or lead to the release of dangerous
18 waste constituents to the environment, or threaten human health. Inspections must be
19 conducted in accordance with the provisions of WAC 173-303-320(2). In addition to the
20 TSD unit inspections specified in Parts III, V, and/or VI, the following inspections will
21 also be conducted:

22 **II.O.1.a** The 100, 200 East, 200 West, 300, and 400 areas will be inspected annually.

23 **II.O.1.b** The Permittees will inspect the banks of the Columbia River, contained within the
24 Facility boundary, once a year. The inspection will be performed from the river, by boat,
25 and the inspectors will follow the criteria in Permit Condition II.O.1.c.

26 **II.O.1.c** The Permittees will visually inspect the areas identified in Permit Conditions II.O.1.a and
27 II.O.1.b for malfunctions, deterioration, operator errors, and discharges which may cause
28 or lead to the release of dangerous waste constituents to the environment, or that threaten
29 human health. Specific items to be noted are as follows:

30 **II.O.1.c.i** Remains of waste containers, labels, or other waste management equipment;

31 **II.O.1.c.ii** Solid waste disposal sites not previously identified for remedial action;

32 **II.O.1.c.iii** Uncontrolled waste containers (e.g., orphan drums);

33 **II.O.1.c.iv** Temporary or permanent activities that could generate an uncontrolled waste form; and

34 **II.O.1.c.v** Unpermitted waste discharges.

35 **II.O.1.d** The Permittees will notify Ecology at least seven (7) days prior to conducting these
36 inspections in order to allow representatives of Ecology to be present during the
37 inspections.

38 **II.O.2** If the inspection by the Permittees, conducted pursuant to Permit Condition II.O.1,
39 reveals any problems, the Permittees will take remedial action on a schedule agreed to by
40 Ecology.

41 **II.O.3** The inspection of high radiation areas will be addressed on a case-by-case basis in either
42 Part III of this Permit, or prior to the inspections required in Permit Condition II.O.1.

- 1 **II.P MANIFEST SYSTEM**
- 2 II.P.1 The Permittees will comply with the manifest requirements of WAC 173-303-370 for
3 waste received from off-site and WAC 173-303-180 for waste shipped off-site.
- 4 II.P.2 Transportation of dangerous wastes along roadways, if such routes are not closed to
5 general public access at the time of transport, can be manifested pursuant to an alternate
6 tracking system as allowed by WAC 173-303-180(6). The alternate tracking system can
7 be a paper system or an electronic system. The roadways addressed by this condition are
8 a public or private right-of-way within or along the border of contiguous property where
9 the movement is under control of the USDOE. The alternate tracking system will consist
10 of documentation between the offering Hanford Facility location and the receiving
11 Hanford Facility location containing the following information:
- 12 II.P.2.a Hanford Facility offeror name, location, and telephone number;
- 13 II.P.2.b Hanford Facility receiver name, location, and telephone number;
- 14 II.P.2.c Description of waste;
- 15 II.P.2.d Number and type of containers;
- 16 II.P.2.e Total quantity of waste;
- 17 II.P.2.f Unit volume/weight;
- 18 II.P.2.g Dangerous waste number(s) or U.S. Department of Transportation hazard class; and
- 19 II.P.2.h Special handling instructions including emergency contacts.
- 20 II.P.3 The Hanford Facility offeror and receiver will resolve any discrepancies of information
21 found related to Permit Conditions II.P.2.a through II.P.2.h.
- 22 II.P.4 If the discrepancies cannot be resolved at the Hanford Facility receiving location, a new
23 Hanford Facility receiver location will be agreed upon, or the dangerous waste will be
24 returned to the offeror location. The documentation accompanying the movement of
25 dangerous waste will be updated to reflect the new receiving location.
- 26 **II.Q ON-SITE TRANSPORTATION**
- 27 II.Q.1 Documentation must accompany any on-site dangerous waste which is transported to or
28 from any TSD unit subject to this Permit, through or within the 600 Area, unless the
29 roadway is closed to general public access at the time of shipment. Waste transported by
30 rail or by pipeline is exempt from this Condition. This documentation will include the
31 following information, unless other unit-specified provisions are designated in Part III or
32 V of this Permit:
- 33 II.Q.1.a Generator's name, location, and telephone number;
- 34 II.Q.1.b Receiving TSD unit's name, location, and telephone number;
- 35 II.Q.1.c Description of waste;
- 36 II.Q.1.d Number and type of containers;
- 37 II.Q.1.e Total quantity of waste;
- 38 II.Q.1.f Unit volume/weight;
- 39 II.Q.1.g Dangerous waste number(s); and
- 40 II.Q.1.h Any special handling instructions.

1 II.Q.2 All non-containerized solid, dangerous waste transported to or from TSD units, subject
2 to this Permit, will be covered to minimize the potential for material to escape during
3 transport.

4 **II.R EQUIVALENT MATERIALS**

5 II.R.1 The Permittees may substitute an equivalent or superior product for any equipment or
6 materials specified in this Permit. Use of equivalent or superior products will not be
7 considered a modification of this Permit. A substitution will not be considered
8 equivalent unless it is at least as effective as the original equipment or materials in
9 protecting human health and the environment.

10 II.R.2 The Permittees will place in the Operating Record (within seven [7] days after the
11 change is put into effect) the substitution documentation, accompanied by a narrative
12 explanation, and the date the substitution became effective. Ecology may judge the
13 soundness of the substitution.

14 II.R.3 If Ecology determines that a substitution was not equivalent to the original, it will notify
15 the Permittees that the Permittees' claim of equivalency has been denied, of the reasons
16 for the denial, and that the original material or equipment must be used. If the product
17 substitution is denied, the Permittees will comply with the original approved product
18 specification, or find an acceptable substitution.

19 **II.S LAND DISPOSAL RESTRICTIONS (LDR)**

20 Unless specifically identified otherwise in the HFFACO, the Permittees will comply with
21 all LDR requirements as set forth in WAC 173-303-140.

22 **II.T ACCESS AND INFORMATION**

23 To the extent that work required by this Permit must be done on property not owned or
24 controlled by the Permittees, the Permittees must utilize their best efforts to obtain
25 access and information at these locations.

26 **II.U MAPPING OF UNDERGROUND PIPING**

27 II.U.1 Reserved.

28 II.U.2 Reserved.

29 II.U.3 The Permittees will maintain piping maps for existing, newly identified, and/or new
30 dangerous waste underground pipelines (including active, inactive, and abandoned
31 pipelines, which contain or contained dangerous waste subject to the provisions of
32 Chapter 173-303 WAC) at the Hanford Facility. The maps will identify the origin,
33 destination, direction of flow, size, depth and type (i.e., reinforced concrete, stainless
34 steel, cast iron, etc.), of each pipe, and the location of their diversion boxes, valve pits,
35 seal pots, catch tanks, receiver tanks, and pumps, and utilize Washington State Plane
36 Coordinates, NAD 83(91), meters. If the type of pipe material is not documented on
37 existing drawings, the most probable material type will be provided. The maps will also
38 identify whether the pipe is active, inactive, or abandoned. The age of all pipes requiring
39 identification pursuant to this Condition will be documented in an Attachment to the
40 submittal. If the age cannot be documented, an estimate of the age of the pipe will be
41 provided based upon best engineering judgment. These maps need not include the pipes
42 within a fenced tank farm or within a building/structure. These maps will be compiled
43 using documented QA/QC control methods and procedures outlined in DOE/RL-96-50,

- 1 Hanford Facility RCRA Permit Mapping and Marking of Dangerous Waste Underground
2 Pipelines Report, September 1996. These maps and any Attachments will be maintained
3 in the Facility Operating Record and be updated annually as required by Permit
4 Condition II.U.4.
- 5 II.U.4 Permittees will maintain current all maps required by Permit Condition II.U.3. These
6 maps will be updated to incorporate new or revised information available by March 30th
7 of each year. By September 30th of each year, the Permittees will submit to Ecology a
8 list of maps that have been updated. The updated maps (including any Attachments) and
9 the annual list submitted to Ecology will be maintained in the Facility Operating Record.
- 10 **II.V MARKING OF UNDERGROUND PIPING**
- 11 The Permittees will maintain marking of underground pipelines located outside the
12 200 East, 200 West, 300, 400, 100N, and 100K Areas. These pipelines will be marked at
13 the point they pass beneath an area fence, at their origin and destination, at any point
14 they cross an improved road, and every 100 meters along the pipeline corridor where
15 practicable. The markers will be labeled with a sign that reads "Buried Dangerous Waste
16 Pipe" and will be visible from a distance of fifteen (15) meters.
- 17 **II.W OTHER PERMITS AND/OR APPROVALS**
- 18 II.W.1 The Permittees will be responsible for obtaining all other applicable federal, state, and
19 local permits authorizing the development and operation of the Facility. To the extent
20 that work required by this Permit must be done under a permit and/or approval pursuant
21 to other regulatory authority, the Permittees will use their best efforts to obtain such
22 permits.
- 23 II.W.2 All other permits related to dangerous waste management activities are severable and
24 enforceable through the permitting authority under which they are issued.
- 25 II.W.3 All air emissions from units subject to this Permit will comply with all applicable state
26 and federal regulations pertaining to air emission controls, including but not limited to,
27 Chapter 173-400 WAC, General Regulations for Air Pollution Sources; Chapter 173-460
28 WAC, Controls for New Sources of Toxic Air Pollutants; and Chapter 173-480 WAC,
29 Ambient Air Quality Standards and Emission Limits for Radionuclides.
- 30 **II.X SCHEDULE EXTENSIONS**
- 31 II.X.1 The Permittees will notify Ecology in writing, as soon as possible, of any deviations or
32 expected deviations, from the schedules of this Permit. The Permittees will include with
33 the notification all information supporting their claim that they have used best efforts to
34 meet the required schedules. If Ecology determines that the Permittees have made best
35 efforts to meet the schedules of this Permit, Ecology will notify the Permittees in writing
36 by certified mail, that the Permittees have been granted an extension. Such an extension
37 will not require a Permit modification under Permit Condition I.C.3. Should Ecology
38 determine that the Permittees have not made best efforts to meet the schedules of this
39 Permit, Ecology may take such action as deemed necessary.
- 40 Copies of all correspondence regarding schedule extensions will be kept in the Operating
41 Record.
- 42 II.X.2 Any schedule extension granted through the approved change control process identified
43 in the HFFACO will be incorporated into this Permit. Such a revision will not require a
44 Permit modification under Permit Condition I.C.3.

1 **II.Y CORRECTIVE ACTION**

2 In accordance with WAC 173-303-646 and WAC 173-303-815(2)(b)(ii), the Permittee
3 must conduct corrective action, as necessary to protect human health and the
4 environment, for releases of dangerous waste and dangerous constituents from solid
5 waste management units and areas of concern at the facility, including releases that have
6 migrated beyond the facility boundary. The Permittee may be required to implement
7 measures within the facility to address releases, which have migrated beyond the
8 facility's boundary. As specified in Permit Conditions II.Y.1.g, II.Y.2.a.iii, and
9 II.Y.2.a.ii, the Permittee's right to challenge Ecology's authority to impose corrective
10 action with respect to radionuclides, CERCLA Past Practice (CPP) Units (as identified
11 under Permit Condition II.Y.2.a.) and selected solid waste management units not covered
12 by the HFFACO at property currently subleased to US Ecology, Inc. (as identified under
13 Permit Condition II.Y.3.a.i), is reserved until such time as Ecology chooses to impose
14 corrective action in accordance with the Permit modification procedures of
15 WAC 173-303-830.

16 **II.Y.1 Compliance with Chapter 173-340 WAC**

17 In accordance with WAC 173-303-646, the Permittee must conduct corrective action "as
18 necessary to protect human health and the environment". To ensure that corrective
19 action will be conducted as necessary to protect human health and the environment,
20 except as provided in Permit Condition II.Y.2, the Permittee must conduct corrective
21 action in a manner that complies with the following provisions of Chapter 173-340
22 WAC:

23 **II.Y.1.a** As necessary to select a cleanup action in accordance with WAC 173-340-360 and
24 WAC 173-340-350 State Remedial Investigation and Feasibility Study;

25 **II.Y.1.b** WAC 173-340-360 Selection of Cleanup Actions;

26 **II.Y.1.c** WAC 173-340-400 Cleanup Actions;

27 **II.Y.1.d** WAC 173-340-410 Compliance Monitoring Requirements;

28 **II.Y.1.e** WAC 173-340-420 Periodic Site Reviews;

29 **II.Y.1.f** WAC 173-340-440 Institutional Controls; and

30 **II.Y.1.g** WAC 173-340-700 through -760 Cleanup Standards, except that to the extent that
31 Ecology seeks to impose corrective action with respect to radionuclides regulated under
32 the provisions of the Atomic Energy Act, as amended, 42 U.S.C. § 2011 et.seq. (AEA),
33 the Permittee may challenge Ecology's authority to impose such corrective action
34 through a timely appeal of the permit modification issued by Ecology without argument
35 from Ecology that such right has been waived by a failure to fully litigate that issue
36 through an appeal taken within thirty (30) days of the issuance of this permit, and
37 without argument from the Permittee that such requirement fails to satisfy a cause for
38 Permit modification under WAC 173-303-830(3)(a).

39 **II.Y.2** Acceptance of Work under Other Authorities or Programs and Integration with the
40 HFFACO.

41 Corrective action is necessary to protect human health and the environment for all units
42 identified in Appendix B and Appendix C of the HFFACO. Notwithstanding Permit
43 Condition II.Y.1, work under other cleanup authorities or programs, including work
44 under the HFFACO, may be used to satisfy corrective action requirements, provided it
45 protects human health and the environment.

- 1 II.Y.2.a For units identified in Appendix C of the HFFACO, as amended, as CERCLA Past
2 Practice (CPP) Units, Ecology accepts work under the HFFACO, as amended, and under
3 the CERCLA program, as satisfying corrective action requirements to the extent
4 provided for in, and subject to the reservations and requirements of, Permit
5 Conditions II.Y.2.a.i through II.Y.2.a.iv.
- 6 II.Y.2.a.i For any unit identified in Appendix C of the HFFACO as a CPP unit, the Permittee must
7 comply with the requirements and schedules related to investigation and cleanup of the
8 CPP unit(s) developed and approved under the HFFACO, as amended. The requirements
9 and schedules related to investigation and cleanup of CPP units currently in place under
10 the HFFACO, as amended, and in the future developed and approved under the HFAOC,
11 as amended, are incorporated into this Permit by this reference and apply under this
12 Permit as if they were fully set forth herein. If the Permittee is not in compliance with
13 requirements of the HFFACO, as amended, that relate to investigation or cleanup of CPP
14 unit(s), Ecology may take action to independently enforce the requirements as corrective
15 action requirements under this Permit.
- 16 II.Y.2.a.ii For any unit identified in Appendix C of the HFFACO as a CPP unit, in the case of an
17 interim ROD, a final decision about satisfaction of corrective action requirements will be
18 made in the context of issuance of a final ROD.
- 19 II.Y.2.a.iii If EPA and Ecology, after exhausting the dispute resolution process under Section XXVI
20 of the HFFACO, cannot agree on requirements related to investigation or cleanup of CPP
21 unit(s), Ecology will notify the Permittee, in writing, of the disagreement and impose, in
22 accordance with the Permit Modification Procedures of WAC 173-303-830, a
23 requirement for the Permittee to conduct corrective action for the subject unit(s) in
24 accordance with Permit Condition II.Y.1. The Permittee may challenge Ecology's
25 authority to impose such corrective action requirements through a timely appeal of such
26 permit modification, without argument from Ecology that the Permittee's right to raise
27 such challenge has been waived by a failure to fully litigate that issue through an appeal
28 taken within thirty (30) days of the issuance of this permit, and without argument from
29 the Permittee that such requirement fails to satisfy a cause for Permit modification under
30 WAC 173-303-830(3)(a). Within sixty (60) days of receipt of the above permit
31 modification, or within some other reasonable period of time agreed to by Ecology and
32 the Permittee, the Permittee must submit for Ecology review and approval, a plan to
33 conduct corrective action in accordance with Permit Condition II.Y.1 for the subject
34 unit(s). The Permittee's plan may include a request that Ecology evaluate work under
35 another authority or program. Approved corrective action plans under this Condition
36 will be incorporated into this Permit in accordance with the Permit Modification
37 Procedures of WAC 173-303-830.
- 38 II.Y.2.a.iv The Permittee must maintain information on corrective action for CPP units covered by
39 the HFFACO in accordance with the HFFACO Action Plan §9.0 and §10.0. In addition,
40 the Permittee must maintain all reports and other information developed in whole, or in
41 part, to implement the requirements of Permit Condition II.Y.2.a, including reports of
42 investigations and all raw data, in the Facility Operating Record in accordance with
43 Permit Condition II.I. Information that is maintained in the Hanford Site Administrative
44 Record may be incorporated by reference into the Facility Operating Record.
- 45 II.Y.2.b For units identified in Appendix C of the HFFACO, as amended, as RPP units, Ecology
46 accepts work under the HFFACO, as amended, as satisfying corrective action
47 requirements to the extent provided for, and subject to the reservations and requirements
48 of, Permit Conditions II.Y.2.b.i through II.Y.2.b.iv.

- 1 II.Y.2.b.i For any unit identified in Appendix C of the HFFACO, as amended, as RPP unit, until a
2 Permit modification is complete under Permit Condition II.Y.2.b.iii., the Permittee must
3 comply with the requirements and schedules related to investigation and cleanup of RPP
4 units developed and approved under the HFFACO, as amended. The requirements and
5 schedules related to investigation and cleanup of RPP units currently in place under the
6 HFFACO, as amended, and in the future developed and approved under the HFFACO, as
7 amended, are incorporated into this Permit by this reference and apply under this Permit
8 as if they were fully set forth herein. Until a permit modification is complete under
9 Permit Condition II.Y.2.b.iii, if the Permittee is not in compliance with requirements and
10 schedules related to investigation and cleanup of RPP units developed and approved
11 under the HFFACO, as amended, Ecology may take action to independently enforce the
12 requirements as corrective action requirements under this Permit.
- 13 II.Y.2.b.ii When the Permittee submits a corrective measures study for an individual RPP unit or a
14 group of RPP units, the Permittee must, at the same time, recommend a remedy for the
15 unit(s). The remedy recommendation must contain all the elements of a draft cleanup
16 action plan under WAC 173-340-360(10).
- 17 II.Y.2.b.iii After considering the Permittees' corrective measures study and remedy
18 recommendation, Ecology will make a tentative remedy selection decision and publish
19 the decision for public review and comment. Public review and comment may be
20 accomplished by publishing the tentative decision as a draft Permit under
21 WAC 173-303-840(10), or by a method that provides an equivalent opportunity for
22 public review and participation. Following public review and comment, Ecology will
23 make a final remedy selection decision. Final remedy decisions will be incorporated into
24 the Permit using the Permit Modification Procedures of WAC 173-303-830.
- 25 II.Y.2.b.iv The Permittee must maintain information on corrective action for RPP units covered by
26 the HFFACO, as amended, in accordance with HFFACO Action Plan §9.0 and §10.0. In
27 addition, the Permittee must maintain all reports and other information developed in
28 whole, or in part, to implement the requirements of Permit Condition II.Y.2.b, including
29 reports of investigations and all raw data, in the Facility Operating Record in accordance
30 with Permit Condition II.I. Information that is maintained in the Hanford Site
31 Administrative Record may be incorporated into the Facility Operating Record by
32 reference.
- 33 II.Y.2.c For each TSD unit or group of units, when the Permittee submits a certification of
34 closure or a certification of completion of post-closure care, or at an earlier time agreed
35 to by Ecology and the Permittee, the Permittee must, at the same time, either:
- 36 II.Y.2.c.i Document that the activities completed under closure and/or post-closure satisfy the
37 requirements for corrective action; or
- 38 II.Y.2.c.ii If the activities completed under closure and/or post-closure care do not satisfy
39 corrective action requirements, identify the remaining corrective action requirements and
40 the schedule under which they will be satisfied, if remaining corrective action
41 requirements will be satisfied by work developed and carried out under the HFFACO
42 provisions for RPP units or CPP units, a reference to the appropriate RPP or CPP process
43 and schedule will suffice.
- 44 II.Y.2.c.iii Ecology will make final decisions as to whether the work completed under closure
45 and/or post-closure care satisfies corrective action, specify any unit-specific corrective
46 action requirements, and incorporate the decision into this Permit in accordance with the
47 Permit Modification Procedures of WAC 173-303-830.

- 1 II.Y.2.d Notwithstanding any other condition in this Permit, Ecology may directly exercise any
2 administrative or judicial remedy under the following circumstances:
- 3 II.Y.2.d.i Any discharge or release of dangerous waste, or dangerous constituents, which are not
4 addressed by the HFFACO, as amended;
- 5 II.Y.2.d.ii Discovery of new information regarding dangerous constituents or dangerous waste
6 management, including but not limited to, information about releases of dangerous waste
7 or dangerous constituents which are not addressed under the HFFACO, as amended; or
- 8 II.Y.2.d.iii A determination that action beyond the terms of the HFFACO, as amended, is necessary
9 to abate an imminent and substantial endangerment to the public health, or welfare, or to
10 the environment.
- 11 II.Y.3 Releases of Dangerous Waste or Dangerous Constituents Not Covered By the HFFACO
- 12 II.Y.3.a US Ecology
- 13 II.Y.3.a.i The following solid waste management units are not covered by the HFFACO:
- 14 A. US Ecology, Inc., SWMU 1: Chemical Trench;
- 15 B. US Ecology, Inc., SWMU 2-13: Low-level radioactive waste trenches 1 through
16 11A; and
- 17 C. US Ecology, Inc., SWMU 17: Underground resin tank.
- 18 II.Y.3.a.ii Selected solid waste management units identified in Permit Condition II.Y.3.a.i are
19 currently being investigated by US Ecology in accordance with the Comprehensive
20 Investigation US Ecology – Hanford Operations Workplan. Following completion of
21 this investigation and any closure required of such solid waste management unit under
22 the authority of the Washington State Department of Health, or within one (1) year of the
23 effective date of this Permit Condition, whichever is earlier, Ecology will make a
24 tentative decision as to whether additional investigation or cleanup is necessary to
25 protect human health or the environment for the solid waste management units identified
26 in Permit Condition II.Y.3.a.i, and publish that decision as a draft permit in accordance
27 with WAC 173-303-840(10). Following the associated public comment period, and
28 consideration of any public comments received during the public comment period,
29 Ecology will publish as final permit conditions under WAC 173-303-840(8) either:
- 30 A. a decision that corrective action is not necessary to protect human health or the
31 environment;
- 32 B. an extension to the schedule established under Permit Condition II.Y.3.a.ii; or
- 33 C. a decision that corrective action in accordance with Permit Condition II.Y.1 is
34 necessary to protect human health or the environment.
- 35 II.Y.3.a.iii If Ecology decides under Permit Condition II.Y.3.a.ii that corrective action is necessary
36 to protect human health or the environment, the Permittee may challenge Ecology's
37 authority to impose such corrective action requirements through a timely appeal of such
38 permit modification, without argument from Ecology that the right to raise such
39 challenge has been waived by a failure to fully litigate that issue through an appeal taken
40 within thirty (30) days of the issuance of this permit, and with argument from the
41 Permittee that such requirement fails to satisfy a cause for permit modification under
42 WAC 173-303-830(3)(a). Within one hundred and eighty (180) days of receipt of the
43 above Permit modification, the Permittee must submit, for Ecology review and approval,
44 a plan to conduct corrective action in accordance with Permit Condition II.Y.1.
45 Approved corrective action plans under this condition will be incorporated into this
46 Permit in accordance with the Permit Modification Procedures of WAC 173-303-830.

1 II.Y.3.b Newly Identified Solid Waste Management Units and Newly Identified Releases of
2 Dangerous Waste or Dangerous Constituents.

3 The Permittee must notify Ecology of all newly-identified solid waste management units
4 and all newly-identified areas of concern at the Facility. For purposes of this condition,
5 a 'newly-identified' solid waste management unit or a 'newly-identified' area of concern
6 is a unit or area not identified in the HFFACO, as amended, on the effective date of this
7 condition and not identified by Permit Condition II.Y.3.a. Notification to Ecology must
8 be in writing and must include, for each newly-identified unit or area, the information
9 required by WAC 173-303-806(4)(a)(xxiii) and WAC 173-303-806(4)(a)(xxiv).
10 Notification to Ecology must occur at least once every calendar year, in January, and
11 must include all units and areas newly identified since the last notification, except that if
12 a newly identified unit or area may present an imminent and substantial endangerment to
13 human health or the environment, notification must occur within five (5) days of
14 identification of the unit or area. If information required by
15 WAC 173-303-806(4)(a)(xxiii) or WAC 173-303-806(4)(a)(xxiv) is already included in
16 the Waste Information Data System, it may be incorporated by reference into the
17 required notification.

18 **II.Z WASTE MINIMIZATION**

19 In accordance with WAC 173-303-380(1)(q), and Section 3005(h) of RCRA, 42 U.S.C.
20 6925(h), the Permittee must place a certification in the Hanford Facility Operating
21 Record, Unit-Specific Files on an annual basis that:

22 II.Z.1.a A program is in place to reduce the volume and toxicity of hazardous waste generated to
23 the degree determined by the Permittee to be economically practicable; and,

24 II.Z.1.b The proposed method of treatment, storage or disposal is that practicable method
25 currently available to the Permittee, which minimizes the present and future threat to
26 human health and the environment.

27 II.Z.2 The Permittee will maintain each such certification of waste minimization in the
28 operating record as required by Permit Condition II.I.1.

29 **II.AA AIR EMISSION STANDARDS FOR PROCESS VENTS**

30 The Permittees will comply with applicable requirements of WAC 173-303-690 for
31 process vents associated with Part III units performing specific separations processes
32 unless exempted by WAC 173-303-690(1)(d). Threshold limits applied to process vents
33 potentially requiring emission controls subject to WAC 173-303-690 are evaluated based
34 on the summation of applicable emission sources for the entire Hanford Facility. When
35 the summed emissions fall below threshold limits in 40 CFR 264.1032(a)(1), no emission
36 control devices are required. If threshold limits in 40 CFR 264.1032(a)(1) are predicted
37 to be exceeded, the Permittees will notify Ecology to determine the appropriate course of
38 action. Unit-specific information is contained in Part III of the Permit for applicable
39 units.

1 **II.BB AIR EMISSION STANDARDS FOR EQUIPMENT LEAKS**

2 The Permittees will comply with applicable requirements of WAC 173-303-691 for
3 certain equipment leaks associated with Part III units unless exempted by
4 WAC 173-303-691(1)(e) or (f). Air emission standards apply to equipment that contacts
5 or contains hazardous wastes with organic concentrations of at least 10 percent by
6 weight. Unit-specific information is contained in Part III of the Permit for applicable
7 units.

8 **II.CC AIR EMISSION STANDARDS FOR TANKS, SURFACE IMPOUNDMENTS,
9 AND CONTAINERS**

10 The Permittees shall comply with applicable requirements of WAC 173-303-692 for
11 containers, tanks, and surface impoundment areas associated with Part III units unless
12 exempted by WAC 173-303-692(1)(b). Unit-specific information is contained in Part III
13 of the Permit for applicable units.

14 **PART III UNIT-SPECIFIC CONDITIONS FOR FINAL STATUS OPERATIONS**

- 15 Operating Unit 1, 305-B Storage Facility (Closed 7/2/07)
- 16 Operating Unit 2, PUREX Storage Tunnels
- 17 Operating Unit 3, Liquid Effluent Retention Facility and 200 Area Effluent Treatment Facility
- 18 Operating Unit 4, 242-A Evaporator
- 19 Operating Unit 5, 325 Hazardous Waste Treatment Units
- 20 Operating Unit 10, Waste Treatment and Immobilization Plant
- 21 Operating Unit 11, Integrated Disposal Facility
- 22 Operating Unit 15, 331-C Storage Unit
- 23 Operating Unit 16, 400 Area Waste Management Unit

24 **PART IV UNIT SPECIFIC CONDITIONS FOR CORRECTIVE ACTION**

- 25 Corrective Action Unit 1, 100-NR-1
- 26 Corrective Action Unit 2, 100-NR-2

27 **PART V UNIT-SPECIFIC CONDITIONS FOR UNITS UNDERGOING CLOSURE**

- 28 Closure Unit 1, 1325-N Liquid Waste Disposal Facility
- 29 Closure Unit 2, 1301-N Liquid Waste Disposal Facility
- 30 Closure Unit 3, 1324-N Surface Impoundment and 1324-NA Percolation Pond
- 31 Closure Unit 10, 224-T Transuranic Waste Storage and Assay Facility

32 **PART VI UNIT-SPECIFIC CONDITIONS FOR UNITS IN POST-CLOSURE**

- 33 Post-Closure Unit 1, 300 Area Process Trenches
- 34 Post-Closure Unit 2, 183-H Solar Evaporation Basins

1 **UNITS RETIRED FROM THE PERMIT**

- 2 100 D Ponds (Closed 8/9/99)
- 3 105-DR Large Sodium Fire Facility (Closed 7/1/04)
- 4 200 West Area Ash Pit Demolition Site (Closed 11/28/95)
- 5 2101-M Pond (Closed 11/28/95)
- 6 216-B-3 Expansion Ponds (Closed 7/31/95)
- 7 218-E-8 Borrow Pit Demolition Site (Closed 11/28/95)
- 8 241-Z Treatment and Storage Tanks (Closed 2/22/07)
- 9 2727-S Nonradioactive Dangerous Waste Storage Facility (Closed 7/31/95)
- 10 300 Area Solvent Evaporator (Closed 7/31/95)
- 11 300 Area Waste Acid Treatment System (Closed 10/30/2005)
- 12 303-K Storage Facility (Closed 7/22/02)
- 13 303-M Oxide Facility (Closed 6/15/06)
- 14 304 Concretion Facility (Closed 1/21/96)
- 15 3718-F Alkali Metal Treatment and Storage Facility Closure Plan (Closed 8/4/98)
- 16 4843 Alkali Metal Storage Facility Closure Plan (Closed 4/14/97)
- 17 Hanford Patrol Academy Demolition Site (Closed 11/28/95)
- 18 Plutonium Finishing Plant Treatment Unit (Closed 2/8/05)
- 19 Simulated High Level Waste Slurry Treatment and Storage Unit (Closed 10/23/95)

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PART I									
CONDITION		CATEGORY							QUALIFIERS
PART	TITLE	A	B	C	D	E	F	G	
I.A.	EFFECT OF PERMIT								
I.A.1.		*	*	*	*	*	*	*	
I.A.2.		*	*	*	*	*	*	*	
I.A.3.		*	*		*	*	*	*	
I.A.4.	Coordination with the FFACO		*		*	*	*	*	
I.B.	PERSONAL AND PROPERTY RIGHTS		*		*	*	*	*	
I.C.	PERMIT ACTIONS								
I.C.1.	Modification, Revocation, Reissuance, or Termination		*		*	*	*	*	
I.C.2.	Filing of a Request		*		*	*	*	*	
I.C.3.	Modifications		*		*	*	*	*	
I.D.	SEVERABILITY								
I.D.1.	Effect of Invalidation		*		*	*	*	*	
I.D.2.	Final Resolution		*		*	*	*	*	
I.E.	DUTIES AND REQUIREMENTS								
I.E.1.	Duty to Comply		*		*	*	*	*	
I.E.2.	Compliance Not Constituting Defense		*		*	*	*	*	
I.E.3.	Duty to Reapply		*		*	*	*	*	
I.E.4.	Permit Expiration & Continuation		*		*	*	*	*	
I.E.5.	Need to Halt or Reduce Activity Not a Defense		*		*	*	*	*	
I.E.6.	Duty to Mitigate		*		*	*	*	*	
I.E.7.	Proper Operation & Maintenance		*			*	*	*	
I.E.8.	Duty to Provide Information		*		*	*	*	*	
I.E.9.	Inspection & Entry		*		*	*	*	*	
I.E.10.	Monitoring & Records								
I.E.11.	Reporting Planned Changes		*			*	*	*	
I.E.12.	Certification of Construction or Modification		*				*		
I.E.13.	Anticipated Noncompliance		*		*	*	*	*	
I.E.14.	Transfer of Permits		*			*	*	*	
I.E.15.	Immediate Reporting		*		*	*	*	*	
I.E.16.	Written Reporting		*		*	*	*	*	

CATEGORIES ARE DEFINED AS FOLLOWS:

- | | |
|---|--|
| A. Leased Land | E. TSD Unit Closures (in Part V) |
| B. North Slope and ALE | F. TSD Operating Units (in Part III) |
| C. Interim Status TSD Units | G. TSD Units in Post-Closure/Modified Closure (in Part VI) |
| D. Areas Between TSDs (excluding A and B) | |

* Condition applies to this category, as modified by applicable footnotes and qualifiers.

- 1 – For Category B, Part I Conditions only apply if future TSD activities are begun on the North Slope or ALE.
- 2 – For Category C, all Part I Conditions apply to activities subject to Conditions II.U. and II.V.
- 3 – For Category D, Part I Conditions only apply to activities subject to Conditions II.A., II.C., II.D.4., II.G., II.I., II.L.3., II.O., II.Q., II.S., II.T., II.X., and II.Y.

PART I									
CONDITION		CATEGORY							QUALIFIERS
PART	TITLE	A	B	C	D	E	F	G	
I.E.17.	Manifest Discrepancy Report								
I.E.17.a			*			*	*	*	
I.E.17.b			*		*	*	*	*	
I.E.18.	Unmanifested Waste Report		*			*	*	*	
I.E.19.	Other Noncompliance		*		*	*	*	*	
I.E.20.	Other Information		*		*	*	*	*	
I.E.21.	Reports, Notifications, & Submissions		*		*	*	*	*	
I.E.22.	Annual Report		*		*	*	*	*	
I.F.	SIGNATORY REQUIREMENT		*		*	*	*	*	
I.G.	CONFIDENTIAL INFORMATION		*		*	*	*	*	
I.H.	DOCUMENTS TO BE MAINTAINED AT FACILITY SITE		*		*	*	*	*	

CATEGORIES ARE DEFINED AS FOLLOWS:

- A. Leased Land
- B. North Slope and ALE
- C. Interim Status TSD Units
- D. Areas Between TSDs (excluding A and B)
- E. TSD Unit Closures (in Part V)
- F. TSD Operating Units (in Part III)
- G. TSD Units in Post-Closure/Modified Closure (in Part VI)

* Condition applies to this category, as modified by applicable footnotes and qualifiers.

- 1 – For Category B, Part I Conditions only apply if future TSD activities are begun on the North Slope or ALE.
- 2 – For Category C, all Part I Conditions apply to activities subject to Conditions II.U. and II.V.
- 3 – For Category D, Part I Conditions only apply to activities subject to Conditions II.A., II.C., II.D.4., II.G., II.I., II.L.3., II.O., II.Q., II.S., II.T., II.X., and II.Y.

PART II									
CONDITION		CATEGORY							QUALIFIERS
PART	TITLE	A	B	C	D	E	F	G	
II.A.	FACILITY CONTINGENCY PLAN								
II.A.1.					*	*	*	*	For Category D, II.A Conditions only apply to releases of hazardous substances that threaten human health or the environment.
II.A.2.					*	*	*	*	
II.A.3.					*	*	*	*	
II.A.4.					*	*	*	*	
II.B.	PREPAREDNESS AND PREVENTION								
II.B.1.						*	*		
II.B.2.						*	*		
II.B.3.						*	*		
II.B.4.						*	*		
II.B.5.						*	*		
II.C.	PERSONNEL TRAINING								
II.C.1.						*	*	*	
II.C.2.					*	*	*	*	
II.C.3.						*	*	*	
II.C.4.					*	*	*	*	For Category D, Condition II.C.4 will not apply to unrestricted (publicly accessible) areas.
II.D.	WASTE ANALYSIS								
II.D.1.						*	*	*	
II.D.2.						*	*	*	
II.D.3.						*	*	*	
II.E.	QUALITY ASSURANCE/ QUALITY CONTROL								
II.E.1.						*	*	*	
II.E.2.						*	*	*	
II.F.	GROUND WATER AND VADOSE ZONE MONITORING					*	*	*	
II.F.1.	Purgewater Management					*	*	*	
II.F.2.	Well Remediation and Abandonment					*	*	*	

CATEGORIES ARE DEFINED AS FOLLOWS:

- A. Leased Land
- B. North Slope and ALE
- C. Interim Status TSD Units
- D. Areas Between TSDs (excluding A and B)
- E. TSD Unit Closures (in Part V)
- F. TSD Operating Units (in Part III)
- G. TSD Units in Post-Closure/Modified Closure (in Part VI)

*Condition applies to this category, as modified by applicable footnotes and qualifiers.

PART II									
CONDITION		CATEGORY							QUALIFIERS
PART	TITLE	A	B	C	D	E	F	G	
II.F.3.	Well Construction					*	*	*	
II.G.	SITING CRITERIA				*		*		For Category D, Condition II.G only applies if a new TSD unit is to be sited.
II.H.	RECORDKEEPING AND REPORTING					*	*	*	
II.I.	FACILITY OPERATING RECORD								For Category D, II.I Conditions only apply to activities subject to this Permit as defined by this matrix. For Category E, Condition applicability to be specified in Part V. Condition II.I only applies to existing records and records prepared after the date of Permit issuance.
II.I.1.		*	*		*	*	*	*	
II.I.1.a.		*	*		*	*	*	*	
II.I.1.b.							*	*	
II.I.1.c.					*	*	*	*	
II.I.1.d.						*	*	*	
II.I.1.e.			*		*				
II.I.1.f.					*	*	*	*	
II.I.1.g.						*	*	*	
II.I.1.h.	Reserved Condition								
II.I.1.i.	Reserved Condition								
II.I.1.j.						*	*	*	
II.I.1.k.					*	*	*	*	
II.I.1.l.	Reserved Condition								
II.I.1.m.						*	*	*	
II.I.1.n.					*	*	*	*	
II.I.1.o.	Reserved Condition								
II.I.1.p.			*		*	*	*	*	

CATEGORIES ARE DEFINED AS FOLLOWS:

- A. Leased Land
- B. North Slope and ALE
- C. Interim Status TSD Units
- D. Areas Between TSDs (excluding A and B)
- E. TSD Unit Closures (in Part V)
- F. TSD Operating Units (in Part III)
- G. TSD Units in Post-Closure/Modified Closure (in Part VI)

*Condition applies to this category, as modified by applicable footnotes and qualifiers.

PART II									
CONDITION		CATEGORY							QUALIFIERS
PART	TITLE	A	B	C	D	E	F	G	
II.I.1.q.			*		*	*	*	*	
II.I.1.r.					*	*	*	*	
II.I.1.s.					*	*	*	*	
II.I.1.t.					*	*	*	*	
II.J.	FACILITY CLOSURE								
II.J.1.						*	*	*	
II.J.2.						*	*	*	
II.J.3.						*	*	*	
II.J.4.						*	*	*	
II.K.	SOIL/GROUND WATER CLOSURE PERFORMANCE STANDARDS								
II.K.1.						*	*	*	
II.K.2.						*	*	*	
II.K.3.						*	*	*	
II.K.4.						*	*	*	
II.K.5.						*	*	*	
II.K.6.						*	*	*	
II.K.7.						*	*	*	
II.L.	DESIGN AND OPERATION OF FACILITY								
II.L.1.	Proper Design and Construction					*	*	*	
II.L.2.	Design Changes, Nonconformance and as-built Drawings					*	*	*	Condition II.L.2, applies to Categories E & G only if it is a landfill closure.
II.L.2.a.						*	*	*	
II.L.2.b.						*	*	*	
II.L.2.c.						*	*	*	
II.L.2.d.						*	*	*	
II.L.2.e.	Facility Compliance				*	*	*	*	
II.M.	SECURITY					*	*	*	
II.N.	RECEIPT OF DANGEROUS WASTES GENERATED OFF-SITE								
II.N.1.	Receipt of Off-Site Waste						*		
II.N.2.	Waste From Sources Outside the U.S.						*		
II.N.3.	Notice to Generator						*		

CATEGORIES ARE DEFINED AS FOLLOWS:

- | | |
|---|--|
| A. Leased Land | E. TSD Unit Closures (in Part V) |
| B. North Slope and ALE | F. TSD Operating Units (in Part III) |
| C. Interim Status TSD Units | G. TSD Units in Post-Closure/Modified Closure (in Part VI) |
| D. Areas Between TSDs (excluding A and B) | |

*Condition applies to this category, as modified by applicable footnotes and qualifiers.

PART II									
CONDITION		CATEGORY							QUALIFIERS
PART	TITLE	A	B	C	D	E	F	G	
II.O.	GENERAL INSPECTION REQUIREMENTS								
II.O.1.					*	*	*	*	
II.O.1.a.					*				
II.O.1.b.					*				
II.O.1.c.					*				
II.O.1.d.					*				
II.O.2.					*	*	*	*	
II.O.3.					*	*	*	*	
II.P.	MANIFEST SYSTEM								
II.P.1.						*	*	*	
II.P.2.						*	*	*	
II.Q.	ON-SITE TRANSPORTATION								
II.Q.1.					*	*	*	*	
II.Q.2.					*	*	*	*	
II.R.	EQUIVALENT MATERIALS								
II.R.1.						*	*	*	
II.R.2.						*	*	*	
II.R.3.						*	*	*	
II.S.	LAND DISPOSAL RESTRICTIONS				*	*	*	*	
II.T.	ACCESS AND INFORMATION				*	*	*	*	
II.U.	MAPPING OF UNDERGROUND PIPING								
II.U.1.	Reserved Condition								
II.U.2.	Reserved Condition								
II.U.3.				*		*	*	*	
II.U.4.				*		*	*	*	
II.V.	MARKING OF UNDERGROUND PIPING			*		*	*	*	
II.W.	OTHER PERMITS AND/OR APPROVALS								
II.W.1.						*	*	*	
II.W.2.						*	*	*	
II.W.3.						*	*	*	

CATEGORIES ARE DEFINED AS FOLLOWS:

- A. Leased Land
- B. North Slope and ALE
- C. Interim Status TSD Units
- D. Areas Between TSDs (excluding A and B)
- E. TSD Unit Closures (in Part V)
- F. TSD Operating Units (in Part III)
- G. TSD Units in Post-Closure/Modified Closure (in Part VI)

*Condition applies to this category, as modified by applicable footnotes and qualifiers.

PART II										
CONDITION		CATEGORY							QUALIFIERS	
PART	TITLE	A	B	C	D	E	F	G		
II.X.	SCHEDULE EXTENSIONS									
II.X.1.				*	*	*	*	*	Condition II.X, only applies to Category C if activities are subject to Conditions II.U, and II.V.	
II.X.2.				*	*	*	*	*	Condition II.X, only applies to Category D if activities are subject to this Permit as defined by this matrix.	
II.Y.	CORRECTIVE ACTION	*	*	*	*	*	*	*		
II.Y.1.	Compliance with Chapter 173-340 WAC	*	*	*	*	*	*	*		
II.Y.1.a.		*	*	*	*	*	*	*		
II.Y.1.b.		*	*	*	*	*	*	*		
II.Y.1.c.		*	*	*	*	*	*	*		
II.Y.1.d.		*	*	*	*	*	*	*		
II.Y.1.e.		*	*	*	*	*	*	*		
II.Y.1.f.		*	*	*	*	*	*	*		
II.Y.1.g.		*	*	*	*	*	*	*		
II.Y.2.	Acceptance of Work Under Other Authorities or Programs and Integration with the FFACO	*	*	*	*	*	*	*		
II.Y.2.a.		*	*	*	*	*	*	*		
II.Y.2.b.		*	*	*	*	*	*	*		
II.Y.2.c.		*	*	*	*	*	*	*		
II.Y.2.d.		*	*	*	*	*	*	*		
II.Y.3.	Releases of Dangerous Waste or Dangerous Constituents Not Covered by the FFACO	*	*	*	*	*	*	*		
II.Y.3.a.	U.S. Ecology	*	*	*	*	*	*	*		
II.Y.3.b.	Newly Identified Solid Waste Management Units and Newly Identified Releases of Dangerous Waste or Dangerous Waste Constituents	*	*	*	*	*	*	*		
II.Z	WASTE MINIMIZATION									
II.Z.1							*			
II.Z.1.a							*			
II.Z.1.b							*			

CATEGORIES ARE DEFINED AS FOLLOWS:

- | | |
|---|--|
| A. Leased Land | E. TSD Unit Closures (in Part V) |
| B. North Slope and ALE | F. TSD Operating Units (in Part III) |
| C. Interim Status TSD Units | G. TSD Units in Post-Closure/Modified Closure (in Part VI) |
| D. Areas Between TSDs (excluding A and B) | |

*Condition applies to this category, as modified by applicable footnotes and qualifiers.

PART II										
CONDITION		CATEGORY							QUALIFIERS	
PART	TITLE	A	B	C	D	E	F	G		
II.Z.2							*			
II.AA	AIR EMISSION STANDARDS FOR PROCESS VENTS						*			
II.BB	AIR EMISSION STANDARDS FOR EQUIPMENT LEAKS						*			
II.CC	AIR EMISSION STANDARDS FOR TANKS, SURFACE IMPOUNDMENTS, AND CONTAINERS						*			

CATEGORIES ARE DEFINED AS FOLLOWS:

- A. Leased Land
- B. North Slope and ALE
- C. Interim Status TSD Units
- D. Areas Between TSDs (excluding A and B)
- E. TSD Unit Closures (in Part V)
- F. TSD Operating Units (in Part III)
- G. TSD Units in Post-Closure/Modified Closure (in Part VI)

*Condition applies to this category, as modified by applicable footnotes and qualifiers.

PART III									
CONDITION		CATEGORY							QUALIFIERS
PART	TITLE	A	B	C	D	E	F	G	
III.	UNIT SPECIFIC CONDITIONS FOR FINAL STATUS OPERATIONS								
III.2	PUREX Storage Tunnels						*		
III.3	Liquid Effluent Retention Facility & 200 Area Effluent Treatment Facility						*		
III.4	242-A Evaporator						*		
III.5	325 Hazardous Waste Treatment Units						*		
III.10	Waste Treatment and Immobilization Plant						*		
III.11	Integrated Disposal Facility						*		
III.15	331-C Storage Unit						*		
III.16	400 Area Waste Management Unit						*		
PART IV									
CONDITION		CATEGORY							QUALIFIERS
PART	TITLE	A	B	C	D	E	F	G	
IV.	UNIT SPECIFIC CONDITIONS FOR CORRECTIVE ACTION								
IV.1	100-NR-1				*	*			
IV.2	100-NR-2				*	*			
PART V									
CONDITION		CATEGORY							QUALIFIERS
PART	TITLE	A	B	C	D	E	F	G	
V.	UNIT SPECIFIC CONDITIONS FOR UNITS UNDERGOING CLOSURE								
V.1	1325-N Liquid Waste Disposal Facility					*			
V.2	1301-N Liquid Waste Disposal Facility					*			
V.3	1324-N Surface Impoundment & 1324-NA Surface Impoundment					*			
V.10	224-T Transuranic Waste Storage and Assay Facility					*			
PART VI									
CONDITION		CATEGORY							QUALIFIERS
PART	TITLE	A	B	C	D	E	F	G	
VI.	UNIT SPECIFIC CONDITIONS FOR UNITS IN POST-CLOSURE								
VI.1	300 Area Process Trenches							*	
VI.2	183-H Solar Evaporation Basins							*	

CATEGORIES ARE DEFINED AS FOLLOWS:

- A. Leased Land
- B. North Slope and ALE
- C. Interim Status TSD Units
- D. Areas Between TSDs (excluding A and B)
- E. TSD Unit Closures (in Part V)
- F. TSD Operating Units (in Part III)
- G. TSD Units in Post-Closure/Modified Closure (in Part VI)

*Condition applies to this category, as modified by applicable footnotes and qualifiers.

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PART III OPERATING UNIT GROUP 16 CONDITIONS

400 Area Waste Management Unit

UNIT DESCRIPTION

The 400 Area Waste Management Unit (WMU) is located within the Fast Flux Test Facility (FFTF) Property Protected Area (PPA) in the 400 Area of the Hanford Facility. The 400 Area WMU consists of two container storage units as follows:

- Fuel Storage Facility (FSF, Building 403). The FSF is a reinforced concrete substructure covered by a steel frame metal-sided high bay building. Building dimensions are 34 x 27 x 12 meters (112 x 90 x 40 feet). The container storage unit is the ground-level floor of the building. Two large steel boxes containing sodium-contaminated Core Component Pots (CCPs) are in storage in the FSF as of the effective date of this permit. While the FSF is physically capable of accommodating additional containers of mixed waste, any additional wastes that may be accepted for storage within the 400 Area WMU are anticipated to be placed in the Interim Storage Area.
- Interim Storage Area, 4718 (ISA) (including Building 432A). The ISA consists of 156 x 247 meters (513 x 247 feet) totally fenced area with perimeter lighting that has been designated for above ground dry cask storage of spent fuel. A concrete pad located within the ISA, which measures 27 x 37 meters (90 x 120 feet), was used for dry cask storage, but will not necessarily be used for mixed waste management. The remainder of the ISA surface is gravel. The ISA is generally flat, but graded to drain in accordance with the general drainage plan for the FFTF PPA. One structure, is open on the east side, and is located on the west fence line of the ISA, but will not be used for mixed waste management.

The location of each storage unit is shown on the scale map contained in Addendum A. The mixed waste stored in these two container storage units is limited exclusively to debris (e.g., piping, equipment, and components) contaminated with elemental sodium and sodium hydroxide (D002). This waste stream is designated as (D001, D003, and WSC2). Neither bulk metallic sodium nor bulk sodium hydroxide will be stored or otherwise managed in the FSF or the ISA.

LIST OF ADDENDUMS

- Addendum A 400 Area WMU Part A Permit Application
- Addendum B 400 Area WMU Waste Analysis Plan
- Addendum C Reserved
- Addendum D Reserved
- Addendum E 400 Area WMU Contingency Plan
- Addendum F 400 Area WMU Training Plan
- Addendum G 400 Area WMU Closure Plan
- Addendum H 400 Area Container Storage Units Inspection Plan

DEFINITIONS

Reserved

ACRONYMS

The following acronyms are specific to Part III Chapter 16 of this permit:

- CCPs Core Component Pots
- FFTF Fast Flux Test Facility
- ISA Interim Storage Area
- FSF Fuel Storage Facility
- PPA Property Protected Area
- WMU Waste Management Unit

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- 1 **III.16.A COMPLIANCE WITH PERMIT CONDITIONS**
- 2 The Permittees are authorized to accept and store mixed waste in the 400 Area WMU
3 container storage units, the FSF and the ISA. These dangerous waste management units
4 and corresponding waste management activities will be subject to conditions in this
5 Chapter, its addendums, and the applicable requirements in Parts I and II.
- 6 **III.16.B GENERAL WASTE MANAGEMENT STANDARDS**
- 7 **III.16.B.1 General Waste Management**
- 8 The Permittees may accept for storage in the 400 Area WMU ISA only those mixed
9 wastes that are identified in Addendum A.
- 10 **III.16.B.2 Waste Analysis Plan**
- 11 **III.16.B.2.a** The Permittees will maintain an accurate and complete knowledge for the waste stream
12 identified in permit condition III.16.B.1. An electronic or hard copy of this information
13 must be available to personnel at the 400 Area Waste Management Unit at all times
14 wastes are being received or managed.
- 15 **III.16.B.2.b** The Permittees will maintain appropriate administrative controls and work practices to
16 ensure that only wastes specified in Permit Condition III.16.B.1 are received by the ISA
17 for storage, and that no commingling or cross-contamination of the waste stream
18 specified in Permit Condition III.16.B.1 with any other waste stream may occur.
- 19 **III.16.B.2.c** Upon receipt of a waste shipment at the ISA in accordance with Addendum B, the
20 Permittees will verify that the corresponding wastes match the specification of wastes
21 acceptable for storage at the ISA in Permit Condition III.16.B.1 through process
22 knowledge and records review. The Permittee will place documentation of the results of
23 this verification and the identity of all wastes accepted for management in the 400 Area
24 WMU portion of the Hanford Facility operating record required by Permit Condition II.I.
- 25 **III.16.B.3 Recordkeeping and Reporting**
- 26 **III.16.B.3.a** The Permittees will comply with the recordkeeping requirements in
27 WAC 173-303-380(1)(o), incorporated by reference.
- 28 **III.16.B.4 Preparedness and Prevention**
- 29 **III.16.B.4.a** The Permittees will post warning signs stating "DANGER—UNAUTHORIZED
30 PERSONNEL KEEP OUT" or an equivalent legend will be posted at entrances to the
31 FSF and the ISA. These signs are, or will be, written in English, legible from a distance
32 of 7.6 meters, and visible from any approach.
- 33 **III.16.B.4.b** The Permittees will comply with the requirements of WAC 173-303-395(1), (2), and (6),
34 incorporated by reference.
- 35 **III.16.B.5 Inspections**
- 36 **III.16.B.5.a** The Permittees will perform inspections of the 400 Area WMU, FSF and the ISA
37 according to the inspection plan in Addendum H. The Permittee will remedy any
38 deterioration or malfunction discovered by an inspection as required by
39 WAC 173-202-320(3), incorporated by reference.

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- 1 III.16.B.5.b The Permittees will place inspection records in the 400 Area WMU portion of the
2 Hanford Facility operating record required by Permit Condition II.I. These records will
3 contain the following information:
- 4 1. Date and time of inspection
 - 5 2. Printed name and the handwritten signature of the inspector
 - 6 3. Notation of the observations made
 - 7 4. Date and nature of any repairs or remedial actions taken, or the scheduled date for
8 such repairs or remedial actions
- 9 **III.16.B.6 Reserved**
- 10 **III.16.B.7 Contingency Plan**
- 11 The Permittees will comply with the 400 Area WMU Contingency Plan in Addendum E
12 to this Chapter in addition to the requirements of Permit Condition II.A.
- 13 **III.16.B.8 Training Plan**
- 14 III.16.B.8.a The Permittees will comply with the training requirements in Addendum F to this
15 Chapter in addition to the requirements of Permit Condition II.C.
- 16 **III.16.B.9 Closure**
- 17 III.16.B.9.a The Permittees will close the 400 Area WMU Container Storage Units in accordance
18 with the Closure Plan in Addendum G.
- 19 III.16.B.9.b The Permittees will amend the Closure Plan in accordance with Permit Condition II.J.3
20 and the Closure Plan in Addendum G.
- 21 III.16.B.9.c The Permittees will provide Ecology with a Notice of Closure according to
22 WAC 173-303-610(3)(c).
- 23 **III.16.B.10 Reserved**
- 24 **III.16.B.11 Land Disposal Restriction Requirements**
- 25 The Permittees will ensure a schedule of compliance and any applicable associated work
26 requirements are included in the land disposal restrictions report required by the
27 HFFACO Milestone M-26, incorporated by reference by permit condition II.S for
28 treatment and/or acquisition of treatment capacity for wastes which are or are expected to
29 be stored in the 400 Area WMU container storage units.
- 30 **III.16.C CONTAINERS**
- 31 **III.16.C.1 Container Dangerous Waste Management Unit Configuration and Waste
32 Management Capacity**
- 33 III.16.C.1.a The Permittees will maintain the physical configuration of the FSF and the ISA according
34 to the Unit Description above.
- 35 III.16.C.1.b The Permittees are authorized to store CCPs generated prior to the effective date of this
36 permit in two large metal boxes in the 400 Area WMU FSF.
- 37 III.16.C.1.c The Permittees are authorized store mixed waste in the ISA up to a maximum capacity of
38 19,000 gallons.

- 1 **III.16.C.2 Identification of Containers and Container Management Practice**
- 2 III.16.C.2.a The Permittees will ensure that all containers remain in good condition. If a container
3 holding mixed waste is not in good condition (e.g., severe rusting or corrosion, or
4 apparent structural defects), or if it begins to leak, the Permittee must transfer the waste
5 from the container to a container that is in good condition or place the leaking container
6 in an appropriate over-pack container. [WAC 173-303-630(2)]
- 7 III.16.C.2.b The Permittees will label containers in accordance with the requirements of
8 WAC 173-303-630(3), incorporated by reference.
- 9 III.16.C.2.c The Permittees shall ensure that all containers are constructed of carbon steel or stainless
10 steel, or other materials compatible with metallic sodium and sodium hydroxide.
11 [WAC 173-303-630(4)]
- 12 III.16.C.2.d The Permittees will manage waste in containers according to the requirements of
13 WAC 173-303-630(5), incorporated by reference.
- 14 III.16.C.2.e All containers must be stored in accordance with WAC 173-303-630(8)(b), incorporated
15 by reference.
- 16 III.16.C.2.f The Permittees must remove spilled or leaked waste within secondary containment
17 pursuant to WAC 173-303-630(7)(a)(ii), incorporated by reference.
- 18 III.16.C.2.g The Permittees will store waste in the 400 Area WMU container storage units according
19 to the requirements of WAC 173-303-640(8)(b), incorporated by reference.
20 [WAC 173-303-640(8)]
- 21 **III.16.C.3 Requirements for the Fuel Storage Facility**
- 22 III.16.C.3.a The Permittee will maintain an inert gas (argon or nitrogen) cover within each large metal
23 box to prevent contact of the metallic sodium with the water vapor in the air and the
24 formation of free liquids.
- 25 III.16.C.3.b The Permittees will place large boxes stored in the FSF in drip pans to ensure a base free
26 of cracks or gaps, and ensure that the large boxes are elevated or otherwise protected
27 from contact with accumulated liquids.
- 28 **III.16.C.4 Requirements for the Interim Storage Area**
- 29 III.16.C.4.a The Permittee may store wastes in the ISA in standard metal containers (e.g., 208-liter
30 drums), large metal boxes fabricated to accommodate the size and shape of a particular
31 component or debris, or unique components removed from FFTF that when closed in
32 accordance with WAC 173-303-630(5)(a) serve as a primary container.
- 33 III.16.C.4.b Unique containers stored in the ISA must be placed on drip pans; or if containing free
34 liquids, within secondary containment having sufficient capacity to contain ten percent of
35 the volume of all containers within the same secondary containment area or the largest
36 container, whichever is greater. [WAC 173-303-630(7)]
- 37 III.16.C.4.c The Permittees will store standard metal containers in the ISA within container storage
38 modules specifically configured for storage of reactive, ignitable, and corrosive waste,
39 and that protect containers from precipitation and run-on. Container storage modules
40 may be placed on gravel within the ISA, and must be properly anchored to prevent
41 displacement or overturning.
- 42 III.16.C.4.d The Permittees will manage unique components stored in the ISA on the gravel surface
43 with sufficient open space between components and between components and the fence
44 line to accommodate inspections and movement of equipment.

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1 III.16.C.4.e The Permittees will not place wastes in the open-sided structure within the ISA identified
2 in the Unit Description.

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WA7 89000 8967, Part III Operating Unit 16
400 Area Waste Management Unit

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	WASHINGTON STATE DEPARTMENT OF E C O L O G Y	<h2 style="margin: 0;">Dangerous Waste Permit Application Part A Form</h2>
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Date Received	Reviewed by: <i>J.F. Davis</i>	Date: 05/16/2007
Month Day Year	Approved by: <i>J.P. Davis</i>	Date: 05/16/2007

I. This form is submitted to: (place an "X" in the appropriate box)

<input checked="" type="checkbox"/>	Request modification to a final status permit (commonly called a "Part B" permit)
<input type="checkbox"/>	Request a change under interim status
<input type="checkbox"/>	Apply for a final status permit. This includes the application for the initial final status permit for a site or for a permit renewal (i.e., a new permit to replace an expiring permit).
<input type="checkbox"/>	Establish interim status because of the wastes newly regulated on: _____ (Date)
List waste codes: _____	

II. EPA/State ID Number

W	A	7	8	9	0	0	0	8	9	6	7
---	---	---	---	---	---	---	---	---	---	---	---

III. Name of Facility

US Department of Energy - Hanford Facility

IV. Facility Location (Physical address not P.O. Box or Route Number)

A. Street

825 Jadwin

City or Town	State	ZIP Code
Richland	WA	99352

County Code (if known)	County Name
005	Benton

B. Land Type	C. Geographic Location	D. Facility Existence Date
	Latitude (degrees, mins, secs) Longitude (degrees, mins, secs)	Month Day Year
F	S E E T O P O M A P	03 22 1943

V. Facility Mailing Address

Street or P.O. Box

P.O. Box 550

City or Town	State	ZIP Code
Richland	WA	99352

VI. Facility contact (Person to be contacted regarding waste activities at facility)												
Name (last)						(first)						
Klein						Keith						
Job Title						Phone Number (area code and number)						
Manager						(509) 376-7395						
Contact Address												
Street or P.O. Box												
P.O. Box 550												
City or Town						State		ZIP Code				
Richland						WA		99352				
VII. Facility Operator Information												
A. Name						Phone Number (area code and number)						
Department of Energy Owner/Operator Fluor Hanford** Co-Operator for 400 Area Waste Management Unit						(509) 376-7395 (509) 375-3576**						
Street or P.O. Box												
P.O. Box 550 P.O. Box 1000 **												
City or Town						State		ZIP Code				
Richland						WA		99352				
B. Operator Type		F										
C. Does the name in VII.A reflect a proposed change in operator?						<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No						
If yes, provide the scheduled date for the change:						Month		Day		Year		
D. Is the name listed in VII.A. also the owner? If yes, skip to Section VIII.C.						<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No						
VIII. Facility Owner Information												
A. Name						Phone Number (area code and number)						
Keith A. Klein, Operator/Facility-Property Owner						(509) 376-7395						
Street or P.O. Box												
P.O. Box 550												
City or Town						State		ZIP Code				
Richland						WA		99352				
B. Operator Type		F										
C. Does the name in VII.A reflect a proposed change in operator?						<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No						
If yes, provide the scheduled date for the change:						Month		Day		Year		
IX. NAICS Codes (5/6 digit codes)												
A. First						B. Second						
5	6	2	2	1		9	2	4	1	1	0	Administration of Air & Water Resource & Solid Waste Management Programs
C. Third						D. Fourth						
5	4	1	7	1	0	9	9	9	9	9	9	Research & Development in the Physical, Engineering, & Life Sciences Unclassified Establishments

EXAMPLE FOR COMPLETING ITEMS XII and XIII (shown in lines numbered X-1, X-2, and X-3 below): A facility has two storage tanks that hold 1200 gallons and 400 gallons respectively. There is also treatment in tanks at 20 gallons/hr. Finally, a one-quarter acre area that is two meters deep will undergo *in situ vitrification*.

Section XII. Process Codes and Design Capacities							Section XIII. Other Process Codes							
Line Number	A. Process Codes (enter code)			B. Process Design Capacity		C. Process Total Number of Units	Line Number	A. Process Codes (enter code)			B Process Design Capacity		C. Process Total Number of Units	D. Process Description
				1. Amount	2. Unit of Measure (enter code)						1. Amount	2. Unit of Measure (enter code)		
X 1	S	0	2	1,600	G	002	X 1	T	0	4	700	C	001	In situ vitrification
X 2	T	0	3	20	E	001								
X 3	T	0	4	700	C	001								
1	S	0	1	20,000	G	003	1							
2							2							
3							3							
4							4							
5							5							
6							6							
7							7							
8							8							
9							9							
1 0							1 0							
1 1							1 1							
1 2							1 2							
1 3							1 3							
1 4							1 4							
1 5							1 5							
1 6							1 6							
1 7							1 7							
1 8							1 8							
1 9							1 9							
2 0							2 0							
2 1							2 1							
2 2							2 2							
2 3							2 3							
2 4							2 4							
2 5							2 5							

XIV. Description of Dangerous Wastes

Example for completing this section: A facility will receive three non-listed wastes, then store and treat them on-site. Two wastes are corrosive only, with the facility receiving and storing the wastes in containers. There will be about 200 pounds per year of each of these two wastes, which will be neutralized in a tank. The other waste is corrosive and ignitable and will be neutralized then blended into hazardous waste fuel. There will be about 100 pounds per year of that waste, which will be received in bulk and put into tanks.

Line Number	A. Dangerous Waste No. (enter code)	B. Estimated Annual Quantity of Waste	C. Unit of Measure (enter code)	D. Processes						
				(1) Process Codes (enter)						(2) Process Description [If a code is not entered in D (1)]
X 1	D 0 0 2	400	P	S	0	1	T	0	1	
X 2	D 0 0 1	100	P	S	0	2	T	0	1	
X 3	D 0 0 2									Included with above
	1 D 0 0 1	30	T	S	0	1				Includes debris
	2 D 0 0 2		T	S	0	1				Includes debris
	3 D 0 0 3		T	S	0	1				Includes debris
	4 W S C 2		T	S	0	1				Includes debris
	5									
	6									
	7									
	8									
	9									
	1 0									
	1 1									
	1 2									
	1 3									
	1 4									
	1 5									
	1 6									
	1 7									
	1 8									
	1 9									
	2 0									
	2 1									
	2 2									
	2 3									
	2 4									
	2 5									

XV. Map

Attach to this application a topographic map of the area extending to at least one (1) mile beyond property boundaries. The map must show the outline of the facility; the location of each of its existing and proposed intake and discharge structures; each of its dangerous waste treatment, storage, recycling, or disposal units; and each well where fluids are injected underground. Include all springs, rivers, and other surface water bodies in this map area, plus drinking water wells listed in public records or otherwise known to the applicant within ¼ mile of the facility property boundary. The instructions provide additional information on meeting these requirements.

XVI. Facility Drawing

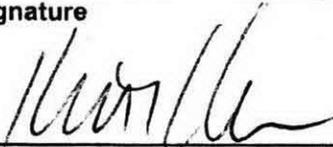
All existing facilities must include a scale drawing of the facility (refer to Instructions for more detail).

XVII. Photographs

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment, recycling, and disposal areas; and sites of future storage, treatment, recycling, or disposal areas (refer to Instructions for more detail).

XVIII. Certifications

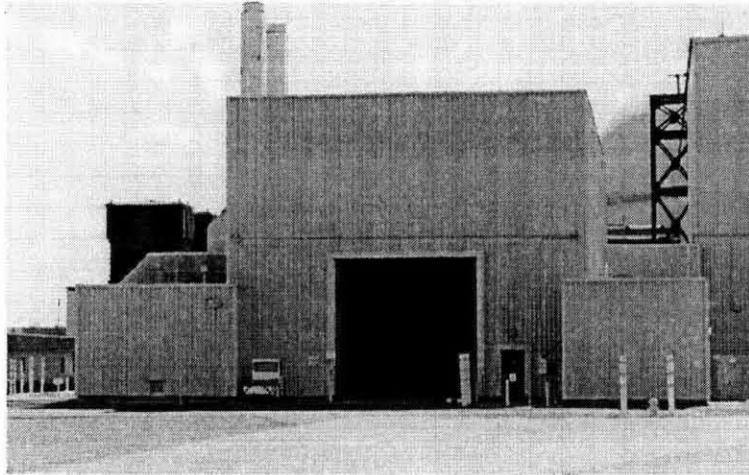
I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Operator Name and Official Title (type or print) Keith A. Klein, Manager U.S. Department of Energy Richland Operations Office	Signature 	Date Signed 5/15/07
Co-Operator** Name and Official Title (type or print) George W. Jackson Executive Vice-President and Chief Operating Officer Fluor Hanford	Signature 	Date Signed 4/27/07
Co-Operator** – Address and Telephone Number 2420 Stevens Center P.O. Box 1000 Richland, WA 99352-1000 (509) 376-3576		
Facility-Property Owner Name and Official Title (type or print) Keith A. Klein, Manager U.S. Department of Energy Richland Operations Office	Signature 	Date Signed 5/15/07

Comments

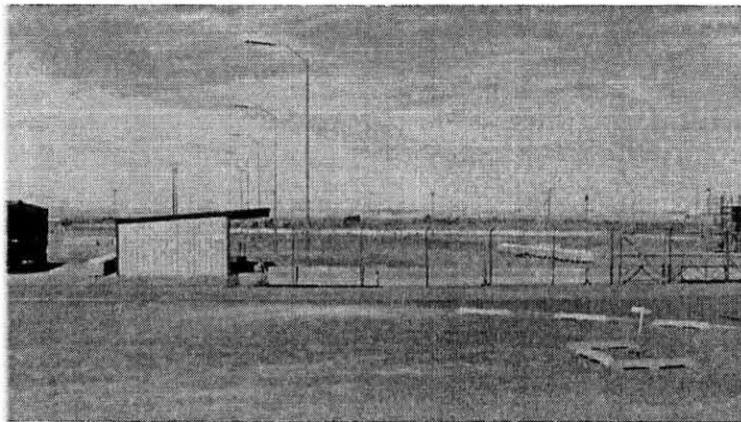
Empty comment box

400 Area Waste Management Unit



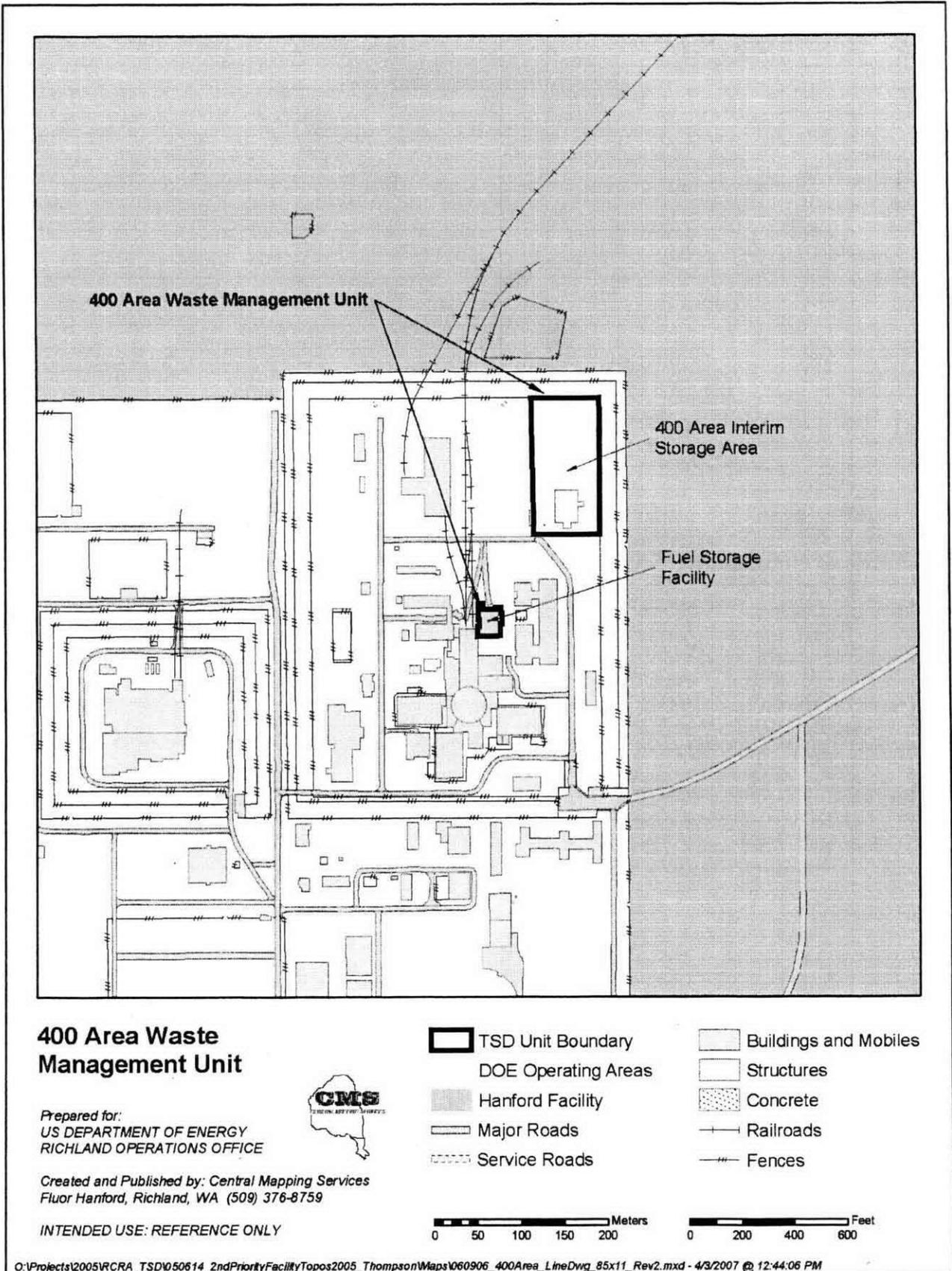
Fuel Storage Facility (FSF)
Building 403

8-2006



Interim Storage Area (ISA)
Building 4718

8-2006



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1	Addendum B	Waste Analysis Plan
2	B. WASTE ANALYSIS PLAN [C]	B.1
3	B.1 UNIT DESCRIPTION	B.1
4	B.1.1 Description of Unit Processes and Activities	B.1
5	B.1.2 Identification and Classification of Waste	B.1
6	B.2 CONFIRMATION PROCESS	B.1
7	B.2.1 Pre-Transfer Review	B.2
8	B.2.2 Verification of Waste	B.2
9	B.2.3 Waste Acceptance	B.2
10	B.2.4 Conformance Issue Resolution	B.2
11	B.3 SELECTING WASTE ANALYSIS PARAMETERS	B.3
12	B.4 SELECTING SAMPLING PROCESSES	B.3
13	B.5 SELECTING A LABORATORY, LABORATORY TESTING, AND	
14	ANALYTICAL METHODS	B.3
15	B.6 SELECTING WASTE RE-EVALUATION FREQUENCIES	B.3
16	B.7 SPECIAL PROCEDURAL REQUIREMENTS	B.3
17	B.8 RECORDKEEPING	B.3
18		

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B. WASTE ANALYSIS PLAN

The purpose of this Waste Analysis Plan (WAP) is to document waste analysis activities associated with the 400 Area WMU to comply with WAC 173-303-300(1), (2), (4), and (5). WAC 173-303-300(3) and (6) are not applicable, as the 400 Area WMU will not receive waste from any offsite facilities. Mixed waste managed in the 400 Area WMU is limited to waste generated in the 400 Area. Descriptions required by WAC 173-303-300(5) are contained in the following sections.

B.1 UNIT DESCRIPTION

The 400 Area WMU is a nonland-based unit located in the 400 Area of the Hanford Facility and contains two container storage dangerous waste management units. The 400 Area WMU is operated in accordance with the provision of WAC 173-303-630. The mission of the 400 Area WMU is to store mixed waste until it is treated. Treatment is not currently provided for mixed waste stored at the 400 Area WMU.

B.1.1 Description of Unit Processes and Activities

The 400 Area WMU includes the FSF (Building 403) and the ISA. The unit boundary is represented by the perimeter of each of these noncontiguous storage locations, as shown on the topographic map related to the Addendum A, Part A Form on file with Ecology.

Addendum A, Part A Form identifies waste quantities and the process design capacity for the 400 Area WMU. Sodium contamination is associated with the sodium used as coolant in the FFTF reactor. The 400 Area WMU will continue to receive sodium-contaminated waste and debris as it is generated from FFTF. In addition, sodium-contaminated waste, generated in association with former FFTF operations and currently in storage at other Hanford Facility locations, could be transferred to the 400 Area WMU for consolidation with other 400 Area-generated waste. Transfers of mixed waste to the 400 Area WMU will be conducted under Permit Condition I.P.2.

B.1.2 Identification and Classification of Waste

Waste types not specifically identified in Addendum A, Part A Form are prohibited from storage in the 400 Area WMU. The waste can only exhibit the characteristics of ignitability, reactivity, and/or corrosivity.

Waste is designated using manufacturers' product information, Material Safety Data Sheets (MSDSs), laboratory analysis provided by the generator, and/or reference material such as Registry of Toxic Effects of Chemical Substances (published by the National Institutes for Occupational Safety and Health). Addendum A, Part A Form identifies dangerous waste numbers for waste types stored at the 400 Area WMU. These dangerous waste numbers and corresponding references are as follows:

<u>Dangerous Waste Number (Characteristic)</u>	<u>Reference</u>
D001 (ignitable)	<u>WAC 173-303-090(5)</u>
D002 (corrosive liquid)	<u>WAC 173-303-090(6)</u>
D003 (reactive)	<u>WAC 173-303-090(7)</u>
WSC2 (corrosive solid)	<u>WAC 173-303-090(6)/104</u>

B.2 CONFIRMATION PROCESS

The confirmation process is the process by which the 400 Area WMU staff will confirm their knowledge about a waste before it is placed into storage to ensure the waste is managed properly. The confirmation process includes completing appropriate pre-transfer reviews and verification steps as described in this section.

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1 **B.2.1 Pre-Transfer Review**

2 Pre-transfer review takes place before waste can be placed in the 400 Area WMU. The review focuses on
3 whether the analysis information (e.g., waste profile documentation) is sufficient to determine that the
4 waste can be safely stored and that the waste was generated at the 400 Area. The pre-transfer review will
5 be documented and maintained in the unit-specific operating record. The analysis must include data
6 obtained by testing the waste and/or 'knowledge' of the waste (i.e., sufficient information about a waste to
7 substitute reliably for direct testing of the waste). 'Knowledge' consists of existing published or
8 documented analysis data on the waste or data from waste generated in similar processes, including but
9 not limited to the following:

- 10 • MSDSs on chemical products
- 11 • Analytical data on the waste or a waste from a similar process
- 12 • Interview information
- 13 • Logbooks
- 14 • Procurement records
- 15 • Qualified analytical data
- 16 • Procedures and/or methods
- 17 • Process flow charts
- 18 • Inventory sheets
- 19 • Vendor information

20 **B.2.2 Verification of Waste**

21 Verification is an assessment performed at waste receipt to substantiate that the waste stream received at
22 the 400 Area WMU is the same as represented by the analysis information and/or supporting
23 documentation. Verification includes a container receipt inspection. Documentation to be reviewed as
24 part of verification activities may include the container inventory documentation, a container listing
25 report, and the waste profile documentation. For all TSD locations within the 400 Area WMU, each
26 container or group of containers is inspected before acceptance by waste operations personnel for
27 damage, proper closure, marking, and proper accompanying documentation.

28 **B.2.3 Waste Acceptance**

29 Acceptance of waste into the 400 Area WMU occurs only after the confirmation process (pre-transfer
30 review and verification) is complete. Conformance issues identified during the confirmation process are
31 documented and managed in accordance with Section H.2.4. Conformance issues that must be corrected
32 before waste acceptance include:

- 33 • Waste that does not match approved waste profile documentation,
- 34 • Designation discrepancy, and
- 35 • Packaging discrepancy

36 **B.2.4 Conformance Issue Resolution**

37 A conformance issue is any discrepancy identified during the confirmation process with waste profile
38 documentation, a waste package, or a waste shipment. Discrepancies can be identified during pre-transfer
39 review of a waste stream or during the verification process. If a possible conformance issue is identified,
40 the following actions are taken by the 400 Area WMU staff to resolve the issue:

- 41 • Compile all information concerning the possible conformance issue(s),
- 42 • Gather additional knowledge that may assist in the resolution of the concern(s), and
- 43 • Determine and implement the appropriate course of action to resolve the issue

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1 **B.3 SELECTING WASTE ANALYSIS PARAMETERS**

2 Sodium is the material of interest to support safe storage of the waste (including contaminated piping,
3 appurtenances, and debris) at the 400 Area WMU. Sodium is a single element waste (i.e., no other
4 chemical contamination) as it was contained in closed-loop cooling systems throughout FFTF reactor
5 operation. In addition, the ignitable and reactive properties of sodium metal are well known and
6 documented (MSDSs and FFTF operating history), and the sodium waste to be stored in the 400 Area
7 WMU is consistent with these properties. Analytical data exist for the sodium contained in the FFTF
8 cooling system, therefore, no further sampling and analyses of the sodium waste are planned.

9 Based on known chemical properties of sodium metal, small amounts of concentrated sodium hydroxide
10 and trace amounts of hydrogen may be generated if the sodium comes in contact with water vapor in the
11 air during storage. Due to the potential formation of sodium hydroxide having a pH greater than 12.5, the
12 sodium metal is designated as a corrosive (WSC2). In the event that liquid is identified in sodium waste
13 secondary containment, the liquid will be managed under the generator provisions of WAC 173-303-200
14 and is beyond the scope of this WAP.

15 **B.4 SELECTING SAMPLING PROCESSES**

16 Additional analytical data are not required to store safely the sodium-contaminated waste at the 400 Area
17 WMU. Therefore, no additional waste sampling is planned.

18 **B.5 SELECTING A LABORATORY, LABORATORY TESTING, AND ANALYTICAL
19 METHODS**

20 Additional analytical data are not required to store safely the sodium-contaminated waste at the 400 Area
21 WMU. Therefore, there is no need to select a laboratory, laboratory testing methods, or analytical
22 methods.

23 **B.6 SELECTING WASTE RE-EVALUATION FREQUENCIES**

24 Additional analytical data are not required to store safely the sodium-contaminated waste at the 400 Area
25 WMU. Therefore, there is no need to select a waste re-evaluation frequency.

26 **B.7 SPECIAL PROCEDURAL REQUIREMENTS**

27 Provisions of WAC 173-303-300(5)(f) are not applicable. Additional analytical data are not required to
28 store safely the sodium-contaminated waste at the 400 Area WMU. Therefore, no special procedural
29 requirements for sampling and analysis apply.

30 The 400 Area WMU will not conduct any land disposal restrictions (LDR) treatment of waste in storage.
31 Therefore, the LDR requirements applicable to the 400 Area WMU are limited to the record keeping
32 requirements in WAC 173-303-380(1)(o) and LDR reporting requirements under the Hanford Federal
33 Facility Agreement and Consent Order. Mixed waste stored in the 400 Area WMU will be treated in
34 accordance with Permit Condition II.S.

35 **B.8 RECORDKEEPING**

36 Confirmation process records, described in Section H.2, will be maintained in accordance with Permit
37 Conditions II.I.1 and II.I.1.b. These records will be maintained in the 400 Area WMU unit-specific
38 portion of the Facility Operating Record from the time the waste is received until a period of ten years
39 following certification of closure.

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1	Addendum E	Contingency Plan
2	E. CONTINGENCY PLAN [G].....	E.1
3	E.1 BUILDING EVACUATION ROUTING (BUILDING LAYOUT).....	E.3
4	E.2 BUILDING EMERGENCY DIRECTOR	E.3
5	E.3 IMPLEMENTATION OF THE PLAN.....	E.3
6	E.3.1 Protective Action Responses.....	E.4
7	E.3.2 Response to Facility Operations Emergencies.....	E.5
8	E.3.3 Prevention of Recurrence or Spread of Fires, Explosions, or Releases.....	E.7
9	E.3.4 Incident Recovery and Restart of Operations	E.7
10	E.3.5 Incompatible Waste	E.8
11	E.3.6 Post Emergency Equipment Maintenance and Decontamination	E.8
12	E.4 EMERGENCY EQUIPMENT.....	E.8
13	E.4.1 Fixed Emergency Equipment.....	E.8
14	E.4.2 Portable Emergency Equipment	E.9
15	E.4.3 Communications Equipment/Warning Systems	E.9
16	E.4.4 Personal Protective Equipment.....	E.10
17	E.4.5 Spill Control and Containment Supplies.....	E.10
18	E.4.6 Incident Command Post.....	E.10
19	E.5 REQUIRED REPORTS.....	E.10
20	E.6 PLAN LOCATION AND AMENDMENTS	E.10
21	E.7 BUILDING EMERGENCY ORGANIZATION BUILDING EMERGENCY DIRECTOR.....	E.11
22	Figures	
23	Figure E.1. FFTF Primary Staging Area.....	E.12
24	Figure E.2. FFTF Alternate Staging Area.....	E.13
25	Table	
26	Table E.1. Hanford Facility Documents Containing Contingency Plan Requirements of	
27	WAC 173 303-350(3)	E.1
28		

OFFICIAL USE ONLY
May be exempt from public release under the Freedom of Information Act
(5 U.S.C. 552)Exemption number(s) and category: Exemption 2
Circumvention of Statute
Department of Energy review required before public release

OFFICIAL USE ONLY

May be exempt from public release under the Freedom of Information Act

(5 U.S.C. 552) Exemption number(s) and category: Exemption 2

Circumvention of Statute

Department of Energy review required before public release

CONTACT:

Greta Davis, State of Washington Department of Ecology
3100 Port of Benton, Richland, 99352
509-372-7894

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Addendum F

400 Area Waste Management Unit Training Matrix

	Training Category*				
	General Hanford Facility training	Contingency Plan training	Emergency Coordinator training	Operations training	
Hanford Facility RCRA Permit, Attachment 33, Chapter 8.0 Training Category					
400 Area WMU DWTP implementing plan	Orientation Program	Emergency Response (contingency plan)	Emergency Coordinator Training	General Waste Management	Container Management
Job title/position					
Regulatory Compliance Staff	X	X		X	X
Environmental Compliance Officer	X	X		X	
Building Emergency Director	X		X		
Non-Resident Waste Service Provider	X			X	
Non-Resident Sampler	X			X	

*Refer to the 400 Area WMU Dangerous Waste Training Plan (DWTP) for a complete description.

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1	Addendum G	Closure & Financial Assurance
2	G. CLOSURE AND FINANCIAL ASSURANCE	G.1
3	G.1 CLOSURE PLAN	G.1
4	G.1.1 Closure Performance Standard	G.1
5	G.1.2 Closure Activities	G.1
6	G.1.3 Maximum Extent of Operation and Maximum Waste Inventory.....	G.4
7	G.2 SCHEDULE FOR CLOSURE	G.4
8	G.3 CERTIFICATION OF CLOSURE.....	G.4
9		

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1 **G. CLOSURE AND FINANCIAL ASSURANCE**

2 The Closure Plan for the 400 Area WMU addresses closure of the two container storage units referred to as
3 the Fuel Storage Facility (FSF) and the Interim Storage Area (ISA). DOE and the contractors are not
4 subject to Financial Assurance as described in Permit Condition II.H, Recordkeeping and Reporting. This
5 closure plan is based on closure by removal or decontamination, or "clean closure," and the general and
6 unit-specific closure criteria in WAC 173-303-610(2) and WAC 173-303-630(10). All mixed waste will be
7 removed from the FSF and ISA at the time of closure.

8 **G.1 CLOSURE PLAN**

9 The following sections document the required closure performance standards and necessary closure
10 activities to close the two container storage units at the 400 Area WMU.

11 **G.1.1 Closure Performance Standard**

12 The closure performance standard for the FSF and the ISA, based on "clean closure," are established for
13 structures, equipment, bases, and liners under WAC 173-303-610(2)(b)(ii). Ecology may establish closure
14 standards under this authority on a case-by-case basis. FSF and ISA will be considered clean when
15 surfaces of structures, equipment, bases, liners, etc., meet the clean debris surface standard in
16 40 CFR 268.45, Table 1 footnote 3. Specifically, this standards requires that potentially contaminated
17 surfaces when viewed without magnification, shall be free of all visible contaminated soil and dangerous
18 waste except that residual staining from soil and waste consisting of light shadows, slight streaks, or minor
19 discolorations, and soil and waste in cracks, crevices and pits may be present provided that such staining
20 and waste and soil in cracks, crevices, and pits shall be limited to no more than 5% of each square inch of
21 surface area.

22 The clean closure standard will be achieved by documenting the absence of, or removing the mixed waste
23 inventory. This includes all mixed waste and dangerous waste constituents from the 400 Area WMU. The
24 operating practices used for waste management at the FSF and the ISA will identify and cleanup any spills
25 or releases that may occur during operation of the units, and document in the unit-specific portion of the
26 Hanford Facility operating record the occurrence of a response to any spill or release. Cleanup of spills
27 and releases from waste management operations will be consistent with the closure performance standard
28 established in this plan, so that no additional cleanup or verification will be necessary at the time of
29 closure. [WAC 173-303-610(2) and WAC 173-303-630(10)].

30 Contamination of soil, groundwater, surface water, or air related to operations at the FSF and ISA is not
31 anticipated to be a concern at the time of closure. Therefore, the closure standards identified in
32 WAC 173-303-610 (2)(b)(i) for soils, ground water, surface water, and air are not discussed at this time.
33 However, in the unlikely event that soil contamination is found, this Closure Plan will be amended with an
34 approved Permit modification and in accordance with WAC 173-303-610(3)(b) to incorporate soil closure
35 performance standards.

36 **G.1.2 Closure Activities**

37 The 400 Area WMU is operated as a clean, well-maintained dangerous waste management unit. Detailed
38 records are and will continue to be maintained of the materials and waste stored at the FSF and ISA,
39 pursuant to permit condition III.16.B.2.c. Spills and other unusual occurrences are responded to and
40 documented pursuant to Section G.1.1. Clean closure of the 400 Area WMU container storage units will
41 demonstrate that the storage areas are not contaminated with mixed waste or dangerous waste constituents.
42 Contamination from the FSF and ISA operations is not expected to be present at the time of closure, since
43 permit condition governing dangerous waste management activities require that any spills or releases be

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1 promptly identified and cleaned up to a performance standard equivalent to the clean closure performance
2 standard established in this closure plan. Therefore, no decontamination is expected to be necessary at the
3 time of closure, no sampling is planned in support of clean closure, and no other closure activities are
4 anticipated.

5 If evaluation of documentation such as spill records, field observations, and personnel interviews indicate
6 the likelihood of waste contamination that was not previously cleaned up, or that the results of past spill
7 cleanup cannot be verified, this Closure Plan will be amended with an approved Permit modification and
8 in accordance with Permit Condition II.J.3. Any unanticipated decontamination activities, sampling and
9 analysis activities, or other activities required for clean closure will be accomplished in accordance with
10 the amended Closure Plan. The Closure Plan will contain the necessary provisions at the time of closure.

11 At a minimum closure activities will accomplish the following.

- 12 • Remove stored waste inventory and transfer to a permitted on-site dangerous waste management unit,
13 or to an off-site facility meeting the definition of a "designated facility" in WAC 173-303-040,
14 incorporated by reference, as appropriate.
- 15 • Perform document review and interview personnel to determine spill history and ensure spills were
16 completely cleaned up consistent with closure performance standards for the FSF and ISA
- 17 • Verify that performance standard has been achieved
- 18 • Obtain certification described in Section G.3 upon performance standard verification
- 19 • Prepare a Permit modification in accordance with Permit Condition II.J.3 to amend the Closure Plan
20 and include the additional work requirements necessary to achieve clean closure upon an initial finding
21 that the performance standard(s) was not achieved.

22 Detailed information for the closure activities are provided as follows.

23 **G.1.2.1 Remove Waste Inventory**

24 All containers of waste will be removed from each container storage dangerous waste management unit. If
25 the containers are removed from the FSF to the ISA to close the FSF in advance of the ISA, a waste
26 transfer to consolidate wastes in the ISA will be accomplished without the need for specialized equipment.
27 Waste transfers will be in compliance with WAC 173-303-380(1)(b).

28 If the containers require transportation from the FSF or the ISA to another on-site dangerous waste
29 management unit or off-site TSD Facility, special transportation containment will be designed and
30 fabricated for the waste stored in the FSF. For waste stored in the ISA, specialized transportation
31 containment and/or packaging will be determined on a case-by-case basis. In addition, the receiving on-
32 site dangerous waste management unit or off-site TSD Facility may require time to modify documents in
33 order to receive the containers of waste.

34 No waste treatment capacity is currently available for the inventory of wastes expected to be managed at
35 the FSF or the ISA. No waste is expected to be generated during closure activities following removal of
36 the waste inventory. This closure plan will be amended in accordance with Permit Condition II.J.3 in the
37 event that waste will be generated.

38 If the ISA never managed any waste at the time of closure, the inspection/survey below will document that
39 condition.

August 27, 2007

1 **G.1.2.2 Perform Document Review and Interview Personnel to Determine Spill History.**

2 Because the 400 Area WMU is and will continue to be a well operated dangerous waste management unit,
3 the operating record will contain documentation of how any spills were properly cleaned up. Proper clean
4 up of spills will be determined by demonstrating any residuals from the spills have been removed. The
5 operating record will show how the spill was cleaned up. A visual performance standard will allow for
6 clean closure of structures, equipment, bases, liners, etc. The spill clean up records in the operating record
7 will become a basis to support clean closure of the ISA gravel areas without the need for sampling. If
8 review of the operating record reveals a problem, the Closure Plan will be amended to include the
9 necessary steps to satisfy the closure performance standard.

10 **G.1.2.3 Verify Performance Standard Achievement**

11 After all waste has been removed from a container storage dangerous waste management unit(s) and the
12 document review has been completed, a visual inspection/survey will be performed on any structures,
13 equipment, bases, liners, etc, to verify that the surface meets the clean debris surface in 40 CFR 268.45
14 Table 1 footnote 3, incorporated by reference. The inspection/survey will evaluate all surfaces, with
15 special emphasis on information derived from evaluation of the operation records, logbooks, and personnel
16 interviews.

17 If no spills occurred in the gravel area of the ISA, the visual inspection/survey will document that "no
18 spills occurred." If there were spills in the gravel area and the document review shows that the spills were
19 completely and properly cleaned up, the visual inspection/survey will document the review finding(s). If
20 information indicates from evaluation of the operation records, logbooks, and personnel interviews that
21 contamination is possible from TSD unit activities, this Closure Plan will be amended with an approved
22 Permit modification in accordance with Permit Condition II.J.3 to incorporate the steps and requirements
23 to achieve clean closure.

24 Once the inspection/survey is complete and results verify clean closure achievement, the certification
25 described in Section G.3 will be obtained.

26 **G.1.2.4 Decontaminate and/or Remove Equipment**

27 No decontamination or equipment removal is expected to be required to achieve clean closure. In the
28 event a problem occurs where decontamination or equipment removal is necessary, a Permit modification
29 will be prepared to amend the closure plan in accordance with Permit Condition II.J.3.

30 **G.1.2.5 Decontaminate Structures**

31 No structures will require decontamination to achieve clean closure. In the event a problem occurs where
32 structures will require decontamination, a Permit modification will be prepared to amend the closure plan
33 in accordance with Permit Condition II.J.3.

34 **G.1.2.6 Remediate Soils**

35 Soil remediation activities are not expected to be necessary as the FSF and ISA are anticipated to be well
36 maintained. Any spills occurring during the operating life of the FSF and ISA are expected to have been
37 properly and completely cleaned up to standards consistent with the closure performance standards. In the
38 event that sampling is necessary for the surrounding gravel areas of the ISA, the Closure Plan will be
39 amended through a Permit modification in accordance with Permit Condition II.J.3.

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WA7 89000 8967, Part III Operating Unit 16
400 Area Waste Management Unit

1 **G.1.3 Maximum Extent of Operation and Maximum Waste Inventory**

2 As authorized by Permit Condition III.16.B.1, the FSF and ISA provide storage capacity for waste
3 generated from decommissioning of the Fast Flux Test Facility (FFTF) before final treatment and/or
4 disposal. The estimated maximum waste inventory is consistent with the combined storage capacity of the
5 FSF and the ISA, or 20,000 gallons.

6 **G.2 SCHEDULE FOR CLOSURE**

7 In accordance with WAC 173-303-610(3)(c), notification to Ecology is required at least 45 days prior to
8 the start of closure of the FSF or the ISA.

9 The closure schedule is based on the time required to perform applicable closure activities described in
10 Section G.1.2. Closure of the FSF and the ISA will be completed 180 days after the start of closure
11 activities at each unit, respectively. When a closure date is established for a container storage dangerous
12 waste management unit(s), the schedule will be evaluated, including any additional closure activities
13 required for clean closure. If Closure Plan modifications are necessary to achieve clean closure, a revised
14 schedule will be proposed as part of the Permit modification package prepared in accordance with Permit
15 Condition II.J.3.

16 **G.3 CERTIFICATION OF CLOSURE**

17 Within 60 days of completion of closure activities required by this closure plan, the Permittees will submit
18 to the Department by registered mail, a certification that the dangerous waste management unit(s) has been
19 closed in accordance with the specifications in this Plan that are in effect at the time of completion of
20 closure activities. This certification of closure will address only requirements of this closure plan covered
21 by the completed closure activities (i.e., either the FSF or the ISA, or both). This certification will be
22 signed by the Permittees and an independent registered professional engineer. The independent registered
23 professional engineer certification is to confirm that the activities took place and that the unit was closed in
24 accordance with the approved Closure Plan. Documentation supporting the independent registered
25 professional engineer's certification must be furnished to Ecology upon request.

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1	Addendum H	Inspection Plan
2	H. INSPECTION PLAN	H.1
3	H.1 GENERAL INSPECTION REQUIREMENTS	H.1
4	H.1.1 Types of Inspections.....	H.1
5	H.1.2 Frequency of Inspections	H.1
6	H.2 SCHEDULE FOR REMEDIAL ACTION FOR PROBLEMS REVEALED [F-2C].....	H.2
7	Tables	
8	Table H.1. Inspection Schedule.....	H.2
9		

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WA7 89000 8967, Part III Operating Unit 16
400 Area Waste Management Unit

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H. INSPECTION PLAN

This section describes the method and schedule for inspection of the 400 Area WMU. The purpose of the inspections are to prevent malfunctions and deterioration, operating errors, discharges, identify leaking containers, improperly stored containers, and degradation of containment and safety equipment and/or systems (e.g., inert gas pressure in feed line). These inspections help to ensure that situations do not exist that might cause or lead to the release of waste to the environment or that might pose a threat to human health. Abnormal conditions identified by inspections are corrected in accordance with WAC 173-303-320(3).

H.1 GENERAL INSPECTION REQUIREMENTS

The content and frequency of inspections are described in this section. Inspections, implemented through operating requirements, are documented on inspection checklists and log sheets. Inspection records are maintained in accordance with Permit Condition II.I.1, and contain the following information:

- Date and time of inspection,
- Printed name and the handwritten signature of the inspector,
- Notation of the observations made, and
- Date and nature of any repairs or remedial actions taken

The inspection checklists consist of a listing of items that are to be assessed during each inspection. A yes/no response is made for each listed item. A 'yes' response means that the item is in compliance with the conditions stated on the checklist. Any problems identified during the inspection, as indicated by a 'no' response on the checklist, are reported to the Operations Manager.

H.1.1 Types of Inspections

Each week a qualified person performs an inspection of the active 400 Area WMU storage areas and containers for any signs of malfunctions, deterioration, discharges, and other anomalies. Specific items and/or problems to be noted during weekly inspections include the following:

- Condition of concrete floor, curbing, and walls (FSF)
- Appropriate safety and packaging equipment
- Container structural integrity
- Containers closed
- Inert gas pressure in feed line to CCP boxes in the FSF
- Significant corrosion of containers
- Evidence of spills or leaks
- Container labels and markings in place, legible, and unobscured
- Moisture in modules including condensation (ISA storage modules)

Quarterly, the 400 Area WMU personnel conduct inspections and tests of safety equipment. These inspections and tests include portable fire extinguishers, first aid equipment, and spill kits. For addition information, refer to Table H.1, Inspection Schedule.

H.1.2 Frequency of Inspections

The 400 Area WMU inspections are performed by qualified personnel. The following inspection frequencies exist (refer to Table H.1):

- Weekly container inspections
- Quarterly inspections
- Daily inspections of those portions of the 400 Area WMU that are in the process of receiving waste or transferring waste out to document any deficiencies noted and to immediately bring deficiencies to the attention of the Operations Manager.
- Annual ignitable/reactive waste storage area inspections

H.2 SCHEDULE FOR REMEDIAL ACTION FOR PROBLEMS REVEALED [F-2C]

Consistent with WAC 173-303-320(3), if inspections identify leaks, spills, and/or precipitation in the secondary containment, the resultant material will be removed on a schedule that prevents hazards to human health and the environment. If corrosion or other obvious structural deficiency is observed on containers, corrective actions shall be pursued in a timeframe established by the Operations Manager.

On receipt and before containers are accepted for storage in the 400 Area WMU, personnel inspect each container to confirm appropriate documentation, labeling, and soundness of containers. Depending on the severity of any container anomalies, corrective actions could range from continued monitoring to correcting on discovery or longer if procurement of needed materials and personnel are required. Other conditions that are not a threat to human health and the environment will be dispositioned in a timeframe established by the Operations Manager.

Table H.1. Inspection Schedule

Requirement Description	Inspection Frequency	Types of Problems
Inspections of those portions of the 400 Area WMU that are in process of receiving or transferring waste out	Daily	Document any deficiencies noted and immediately bring the deficiencies to the attention of the Operations Manager
Container storage areas (FSF)	Weekly	Condition of concrete floor, container structural integrity, containers closed, inert gas pressure in feed line to large boxes, significant corrosion of containers, evidence of leaks, spills, accumulated liquids, and open and improperly sealed containers, container labels and markings in place, legible, and unobstructed
Container storage, large boxes, and unique components (ISA)	Weekly	Condition of containers/large boxes/unique components structural integrity, containers closed, significant corrosion of containers, evidence of leaks, spills, accumulated liquids, and open and improperly sealed containers, container labels and markings in place, legible, and unobstructed, and moisture and condensate in the storage modules
Portable fire extinguishers, first aid kits, spill response kits	Quarterly	Check for equipment not present and test, as appropriate
Ignitable or reactive waste	Annual	Storage in compliance with <u>WAC 173-303-395(l)(d)</u>

August 2007

WA7 89000 8967, Part V, Closure Unit 10
224-T Transuranic Waste Storage and Assay Facility

1 **PART V CLOSURE UNIT 10 CONDITIONS**

2 **224-T Transuranic Waste Storage and Assay Facility**

3 The 224-T Transuranic Waste Storage and Assay Facility (224-T TRUSAF) treatment, storage, and/or
4 disposal unit is part of the 224-T Plutonium Concentration Facility. The 224-T Plutonium Concentration
5 Facility is adjacent to T Plant in the 200 West Area. The 224-T TRUSAF stored transuranic waste,
6 transuranic mixed waste, mixed waste, and other properly characterized and packaged low-level waste.
7 Dangerous wastes were removed from 224-T TRUSAF and the unit is no longer being operated as a TSD
8 unit.

9 **V.10.A. COMPLIANCE WITH APPROVED CLOSURE PLAN**

10 The Permittees will comply with all requirements set forth in Hanford Facility Dangerous Waste Permit,
11 as specified in Permit Attachment 3, Permit Applicability Matrix and the unit-specific conditions
12 identified below for the 224-T Transuranic Waste Storage and Assay Facility

13 **CLOSURE UNIT 10**

14 Part A Form, Revision 7, dated July 2007

15 224-T Transuranic Waste Storage and Assay Facility Closure Plan, dated August 2007

August 2007

WA7 89000 8967, Part V, Closure Unit 10
224-T Transuranic Waste Storage and Assay Facility

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 WASHINGTON STATE DEPARTMENT OF E C O L O G Y		Dangerous Waste Permit Application Part A Form	
Date Received		Reviewed by: <i>[Signature]</i>	Date: 10/16/2007
Month	Day	Year	Date: 10/16/2007
1	0	16	2007
I. This form is submitted to: (place an "X" in the appropriate box)			
<input checked="" type="checkbox"/>	Request modification to a final status permit (commonly called a "Part B" permit)		
<input type="checkbox"/>	Request a change under interim status		
<input type="checkbox"/>	Apply for a final status permit. This includes the application for the initial final status permit for a site or for a permit renewal (i.e., a new permit to replace an expiring permit).		
<input type="checkbox"/>	Establish interim status because of the wastes newly regulated on:	(Date)	
List waste codes:			
II. EPA/State ID Number			
W	A	7890008967	
III. Name of Facility			
US Department of Energy - Hanford Facility			
IV. Facility Location (Physical address not P.O. Box or Route Number)			
A. Street 825 Jadwin			
City or Town		State	ZIP Code
Richland		WA	99352
County Code (if known)	County Name		
005	Benton		
B. Land Type	C. Geographic Location		D. Facility Existence Date
	Latitude (degrees, mins, secs)	Longitude (degrees, mins, secs)	Month Day Year
F	SEE	TOPO	MAP
			03221943
V. Facility Mailing Address			
Street or P.O. Box P.O. Box 550			
City or Town		State	ZIP Code
Richland		WA	99352

VI. Facility contact (Person to be contacted regarding waste activities at facility)												
Name (last)						(first)						
Brockman						David						
Job Title						Phone Number (area code and number)						
Manager						(509) 376-6880						
Contact Address												
Street or P.O. Box												
P.O. Box 550												
City or Town						State			ZIP Code			
Richland						WA			99352			
VII. Facility Operator Information												
A. Name						Phone Number (area code and number)						
Department of Energy Owner/Operator Fluor Hanford Co-Operator for 224-T TRUSAF*						(509) 376-6880 (509) 376-3576 *						
Street or P.O. Box												
P.O. Box 550 P.O. Box 1000 *												
City or Town						State			ZIP Code			
Richland						WA			99352			
B. Operator Type		F										
C. Does the name in VII.A reflect a proposed change in operator?						<input type="checkbox"/> Yes		<input checked="" type="checkbox"/> No				
If yes, provide the scheduled date for the change:						Month		Day			Year	
D. Is the name listed in VII.A. also the owner? If yes, skip to Section VIII.C.						<input type="checkbox"/> Yes		<input checked="" type="checkbox"/> No				
VIII. Facility Owner Information												
A. Name						Phone Number (area code and number)						
David A. Brockman, Operator/Facility-Property Owner						(509) 376-6880						
Street or P.O. Box												
P.O. Box 550												
City or Town						State			ZIP Code			
Richland						WA			99352			
B. Operator Type		F										
C. Does the name in VII.A reflect a proposed change in operator?						<input type="checkbox"/> Yes		<input checked="" type="checkbox"/> No				
If yes, provide the scheduled date for the change:						Month		Day			Year	
IX. NAICS Codes (5/6 digit codes)												
A. First						B. Second						
5	6	2	2	1		9	2	4	1	1	0	Administration of Air & Water Resource & Solid Waste Management Programs
C. Third						D. Fourth						
5	4	1	7	1	0	9	9	9	9	9	9	Research & Development in the Physical, Engineering, & Life Sciences Unclassified Establishments

EXAMPLE FOR COMPLETING ITEMS XII and XIII (shown in lines numbered X-1, X-2, and X-3 below): A facility has two storage tanks that hold 1200 gallons and 400 gallons respectively. There is also treatment in tanks at 20 gallons/hr. Finally, a one-quarter acre area that is two meters deep will undergo *in situ vitrification*.

Section XII. Process Codes and Design Capacities							Section XIII. Other Process Codes							
Line Number	A. Process Codes (enter code)			B. Process Design Capacity		C. Process Total Number of Units	Line Number	A. Process Codes (enter code)			B. Process Design Capacity		C. Process Total Number of Units	D. Process Description
	1	2	3	1. Amount	2. Unit of Measure (enter code)			1	2	3	1. Amount	2. Unit of Measure (enter code)		
X 1	S	0	2	1,600	G	002	X 1	T	0	4	700	C	001	In situ vitrification
X 2	T	0	3	20	E	001								
X 3	T	0	4	700	C	001								
1	S	0	1	416,395	L	001	1							
2							2							
3							3							
4							4							
5							5							
6							6							
7							7							
8							8							
9							9							
1 0							1 0							
1 1							1 1							
1 2							1 2							
1 3							1 3							
1 4							1 4							
1 5							1 5							
1 6							1 6							
1 7							1 7							
1 8							1 8							
1 9							1 9							
2 0							2 0							
2 1							2 1							
2 2							2 2							
2 3							2 3							
2 4							2 4							
2 5							2 5							

XIV. Description of Dangerous Wastes

Example for completing this section: A facility will receive three non-listed wastes, then store and treat them on-site. Two wastes are corrosive only, with the facility receiving and storing the wastes in containers. There will be about 200 pounds per year of each of these two wastes, which will be neutralized in a tank. The other waste is corrosive and ignitable and will be neutralized then blended into hazardous waste fuel. There will be about 100 pounds per year of that waste, which will be received in bulk and put into tanks.

Line Number	A. Dangerous Waste No. (enter code)	B. Estimated Annual Quantity of Waste	C. Unit of Measure (enter code)	D. Processes									
				(1) Process Codes (enter)				(2) Process Description [If a code is not entered in D (1)]					
X 1	D 0 0 2	400	P	S	0	1	T	0	1				
X 2	D 0 0 1	100	P	S	0	2	T	0	1				
X 3	D 0 0 2												Included with above
1	D 0 0 1	227	K	S	0	1							Includes Debris
2	D 0 0 2		K	S	0	1							Includes Debris
3	D 0 0 3		K	S	0	1							Includes Debris
4	D 0 0 4		K	S	0	1							Includes Debris
5	D 0 0 5		K	S	0	1							Includes Debris
6	D 0 0 6		K	S	0	1							Includes Debris
7	D 0 0 7		K	S	0	1							Includes Debris
8	D 0 0 8	454	K	S	0	1							Includes Debris
9	D 0 0 9	227	K	S	0	1							Includes Debris
10	D 0 1 0		K	S	0	1							Includes Debris
11	D 0 1 1		K	S	0	1							Includes Debris
12	D 0 1 2		K	S	0	1							Includes Debris
13	D 0 1 3		K	S	0	1							Includes Debris
14	D 0 1 4		K	S	0	1							Includes Debris
15	D 0 1 5		K	S	0	1							Includes Debris
16	D 0 1 6		K	S	0	1							Includes Debris
17	D 0 1 7		K	S	0	1							Includes Debris
18	D 0 1 8		K	S	0	1							Includes Debris
19	D 0 1 9		K	S	0	1							Includes Debris
20	D 0 2 0		K	S	0	1							Includes Debris
21	D 0 2 1		K	S	0	1							Includes Debris
22	D 0 2 2		K	S	0	1							Includes Debris
23	D 0 2 3		K	S	0	1							Includes Debris
24	D 0 2 4		K	S	0	1							Includes Debris
25	D 0 2 5		K	S	0	1							Includes Debris

EPA/State ID Number	W	A	7	8	9	0	0	0	8	9	6	7
---------------------	---	---	---	---	---	---	---	---	---	---	---	---

Continuation of Section XIV. Description of Dangerous Waste

Line Number	A. Dangerous Waste No. (enter code)				B. Estimated Annual Quantity of Waste	C. Unit of Measure (enter code)	D. Process							(2) Process Description [If a code is not entered in D (1)]			
							(1) Process Codes (enter)										
196	U	1	4	1		K	S	0	1								Includes Debris
197	U	1	4	2		K	S	0	1								Includes Debris
198	U	1	4	3		K	S	0	1								Includes Debris
199	U	1	4	4		K	S	0	1								Includes Debris
200	U	1	4	5		K	S	0	1								Includes Debris
201	U	1	4	6		K	S	0	1								Includes Debris
202	U	1	4	7		K	S	0	1								Includes Debris
203	U	1	4	8		K	S	0	1								Includes Debris
204	U	1	4	9		K	S	0	1								Includes Debris
205	U	1	5	0		K	S	0	1								Includes Debris
206	U	1	5	1		K	S	0	1								Includes Debris
207	U	1	5	2		K	S	0	1								Includes Debris
208	U	1	5	3		K	S	0	1								Includes Debris
209	U	1	5	4		K	S	0	1								Includes Debris
210	U	1	5	5		K	S	0	1								Includes Debris
211	U	1	5	6		K	S	0	1								Includes Debris
212	U	1	5	7		K	S	0	1								Includes Debris
213	U	1	5	8		K	S	0	1								Includes Debris
214	U	1	5	9		K	S	0	1								Includes Debris
215	U	1	6	0		K	S	0	1								Includes Debris
216	U	1	6	1		K	S	0	1								Includes Debris
217	U	1	6	2		K	S	0	1								Includes Debris
218	U	1	6	3		K	S	0	1								Includes Debris
219	U	1	6	4		K	S	0	1								Includes Debris
220	U	1	6	5		K	S	0	1								Includes Debris
221	U	1	6	6		K	S	0	1								Includes Debris
222	U	1	6	7		K	S	0	1								Includes Debris
223	U	1	6	8		K	S	0	1								Includes Debris
224	U	1	6	9		K	S	0	1								Includes Debris
225	U	1	7	0		K	S	0	1								Includes Debris
226	U	1	7	1		K	S	0	1								Includes Debris
227	U	1	7	2		K	S	0	1								Includes Debris
228	U	1	7	3		K	S	0	1								Includes Debris
229	U	1	7	4		K	S	0	1								Includes Debris

XV. Map
Attach to this application a topographic map of the area extending to at least one (1) mile beyond property boundaries. The map must show the outline of the facility; the location of each of its existing and proposed intake and discharge structures; each of its dangerous waste treatment, storage, recycling, or disposal units; and each well where fluids are injected underground. Include all springs, rivers, and other surface water bodies in this map area, plus drinking water wells listed in public records or otherwise known to the applicant within ¼ mile of the facility property boundary. The instructions provide additional information on meeting these requirements.

XVI. Facility Drawing
All existing facilities must include a scale drawing of the facility (refer to Instructions for more detail).

XVII. Photographs
All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment, recycling, and disposal areas; and sites of future storage, treatment, recycling, or disposal areas (refer to Instructions for more detail).

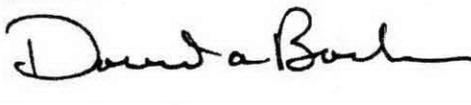
XVIII. Certifications

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

<p>Operator Name and Official Title (type or print) David A. Brockman, Manager U.S. Department of Energy Richland Operations Office</p>	<p>Signature </p>	<p>Date Signed 10/12/07</p>
--	---	--

<p>Co-Operator* Name and Official Title (type or print) Cornelius M. Murphy President and Chief Executive Officer Fluor Hanford</p>	<p>Signature </p>	<p>Date Signed 8/15/07</p>
--	--	---------------------------------------

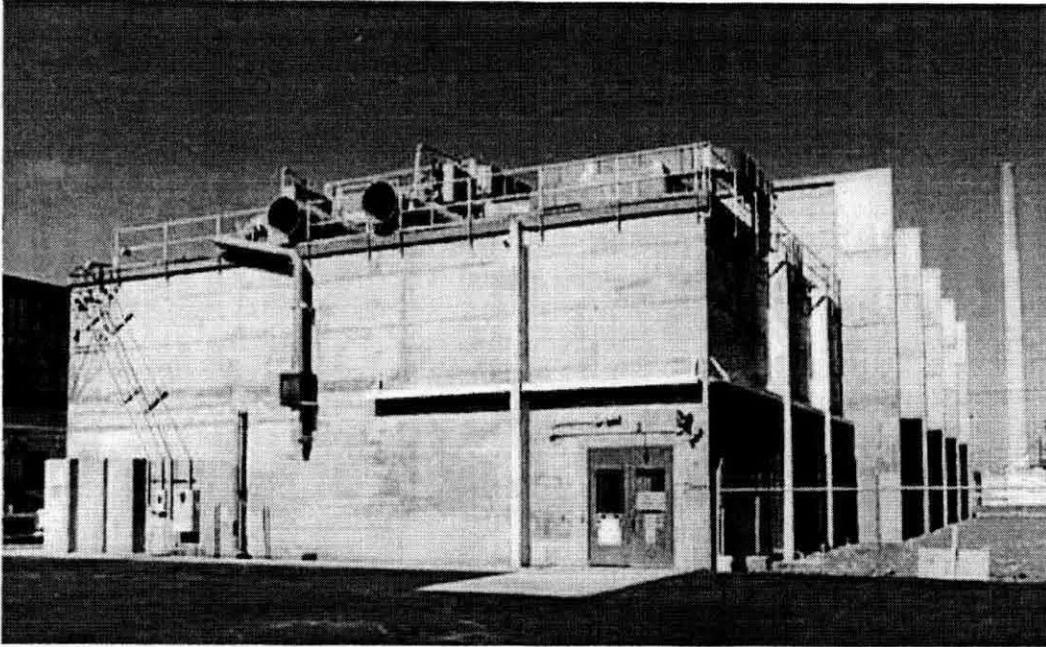
Co-Operator* – Address and Telephone Number
2420 Stevens Center
P.O. Box 1000
Richland, WA 99352
(509) 376-3576

<p>Facility-Property Owner Name and Official Title (type or print) David A. Brockman, Manager U.S. Department of Energy Richland Operations Office</p>	<p>Signature </p>	<p>Date Signed 10/12/07</p>
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Comments

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224-T Transuranic Waste Storage and Assay Facility



224-T TRUSAF

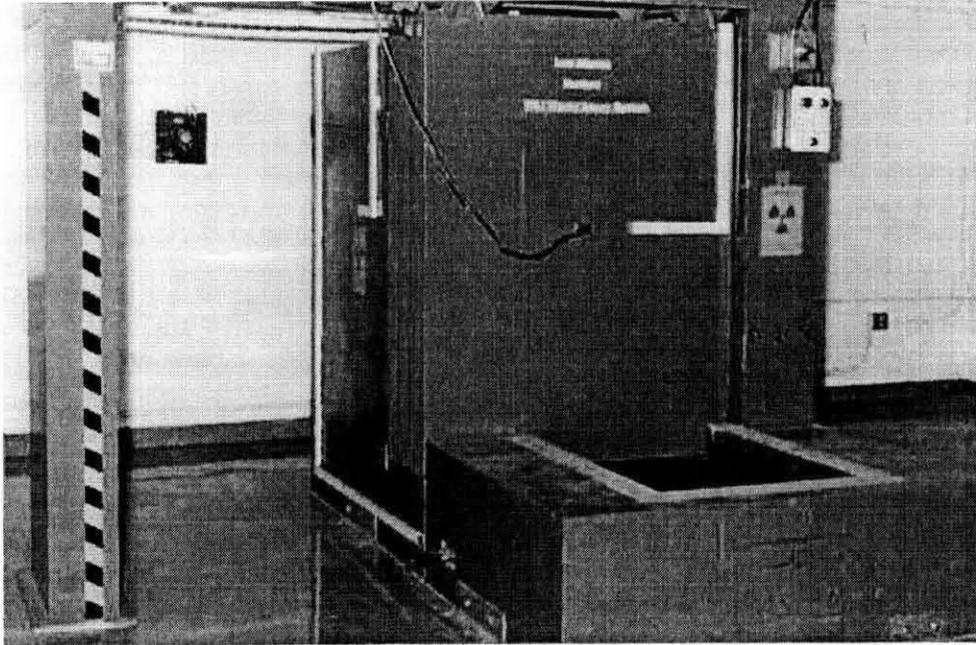
95030798-31CN
PHOTO TAKEN 1995



224-T TRUSAF

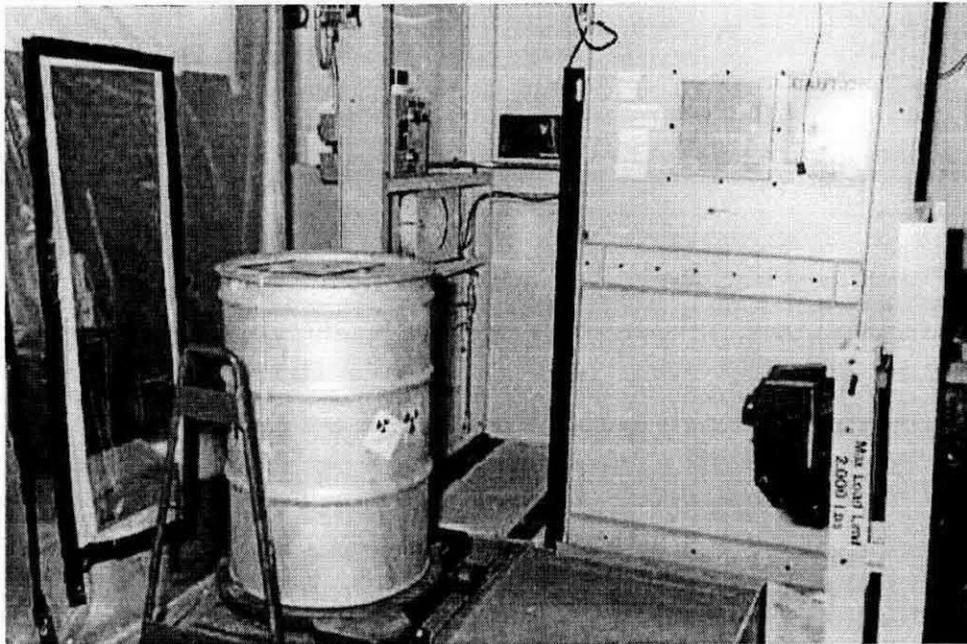
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PHOTO TAKEN 1995

224-T Transuranic Waste Storage and Assay Facility



Transuranic Waste Assayer

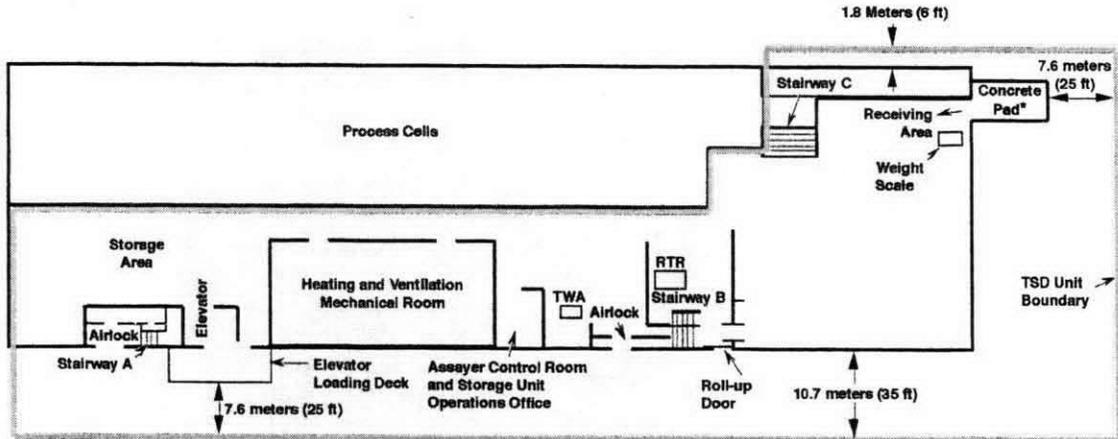
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PHOTO TAKEN 1995



Real-Time Radiography X-Ray System

95030798-4CN
PHOTO TAKEN 1995

224-T Transuranic Waste Storage and Assay Facility



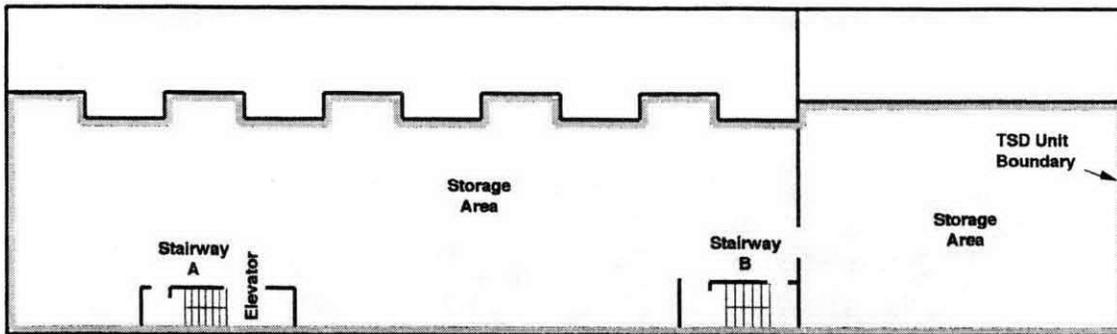
TWA = transuranic waste assayer.

H9504015.3

RTR = real-time radiography x-ray system.

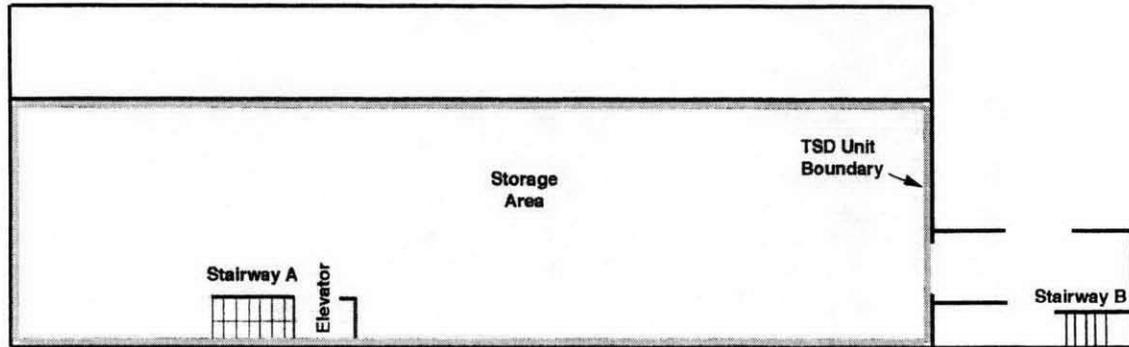
* Primary loading and unloading pad.

1st Floor



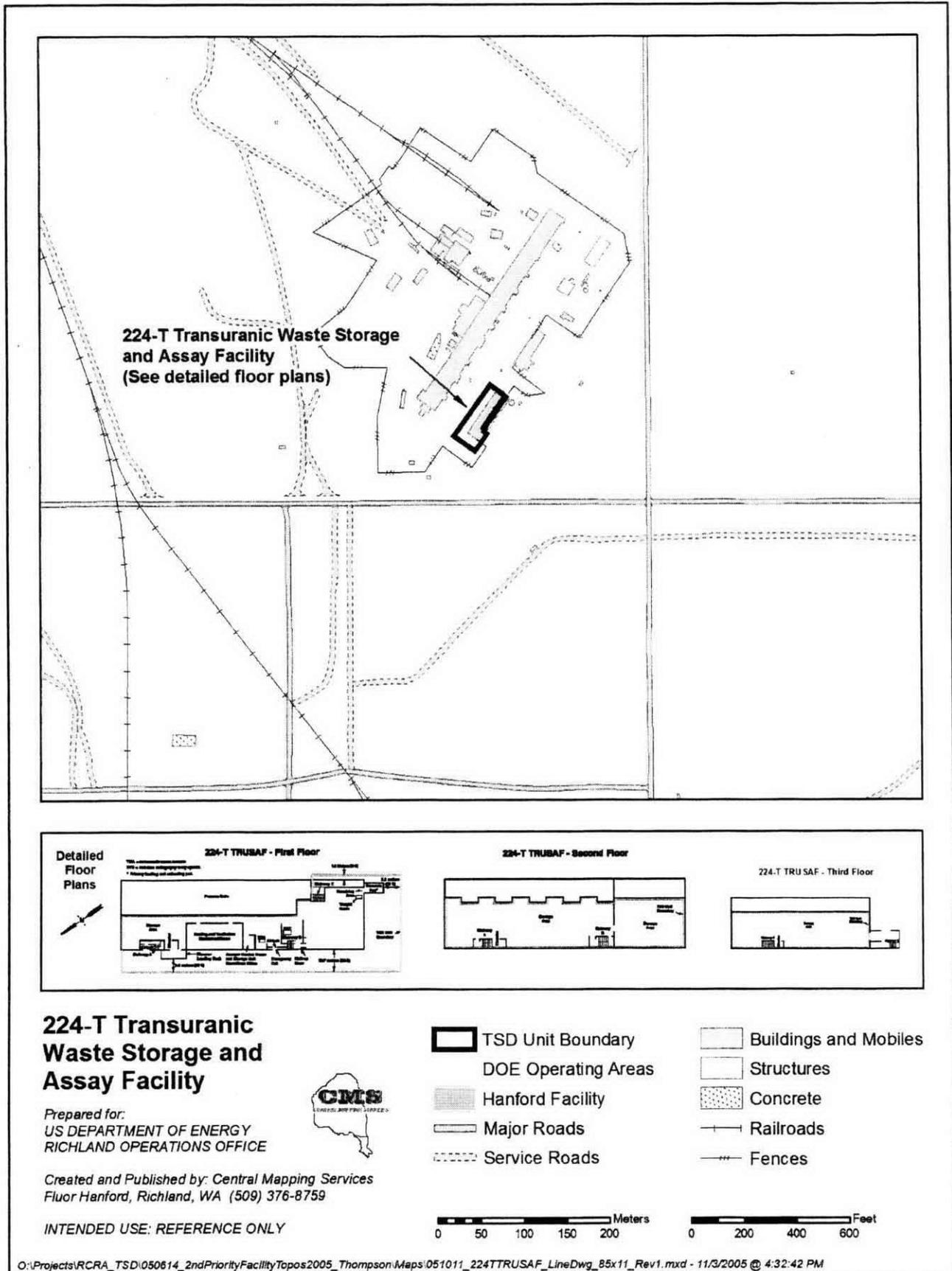
H9504015.2

2nd Floor



H9504015.1

3rd Floor



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1 **224-T Transuranic Waste Storage and Assay Facility Closure Plan**

2 **1.0 FACILITY DESCRIPTION**

3 The 224-T Transuranic Waste Storage and Assay Facility (224-T TRUSAF) treatment, storage, and/or
4 disposal unit is part of the 224-T Plutonium Concentration Facility. The 224-T Plutonium Concentration
5 Facility is adjacent to T Plant in the 200 West Area. The 224-T TRUSAF stored transuranic waste,
6 transuranic mixed waste, mixed waste, and other properly characterized and packaged low-level waste.
7 Dangerous wastes were removed from 224-T TRUSAF and the unit is no longer being operated as a TSD
8 unit. Because dangerous waste does not include the source, special nuclear, and by-product material
9 components of mixed waste, radionuclides are not within the scope of this documentation. The
10 information on radionuclides is provided only for general knowledge.

11 The 224-T Plutonium Concentration Facility remediation, which will include the 224-T TRUSAF TSD
12 unit, will be conducted as a Comprehensive Environmental Response, Compensation, and Liability Act
13 (CERCLA) removal action. The response action will be conducted as described in the joint Department
14 of Energy/U.S. Environmental Protection Agency (EPA) policy, Policy on Decommissioning Department
15 of Energy Facilities under CERCLA, for decommissioning surplus DOE facilities consistent with the
16 requirements of the CERCLA.

17 **1.1 FACILITY OPERATIONS**

18 On receipt of the transuranic mixed waste or mixed waste, the 224-T TRUSAF operations personnel
19 performed an inspection (exterior only) of the waste container(s) and associated documentation, a neutron
20 assay of the waste container to determine fissile isotope content, and/or an examination with a real-time
21 radiography (RTR) system to confirm the absence of prohibited items (e.g., free liquids). If the waste
22 container(s) and accompanying documentation were acceptable, the 224-T TRUSAF operations personnel
23 stored the waste.

24 The 224-T Plutonium Concentration Facility, constructed in the early 1940's entirely of reinforced
25 concrete, was used as a chemical processing unit for purifying liquid plutonium nitrate by the lanthanum
26 fluoride process. The 224-T Plutonium Concentration Facility remained idle for several years after new
27 processes made the lanthanum fluoride process obsolete. In 1975, the mission of the 224-T Plutonium
28 Concentration Facility changed to that of storing plutonium solutions and solid plutonium scrap. To meet
29 the requirements for this new mission and the criteria for storing plutonium, the 224-T Plutonium
30 Concentration Facility underwent major structural upgrades and modifications. The modifications
31 included reinforcing the facility for tornado and seismic loads and sealing off the areas previously used
32 for chemical separations from personnel entry. The three floors of the building contain six radiologically
33 contaminated process cells, which were sealed from the rest of the building in 1975. The six process cells
34 (cells A through F) are not included in this closure plan documentation. In 1985, the storage of
35 transuranic waste, transuranic mixed waste, mixed waste, and low-level waste commenced, and the
36 portion of the 224-T Plutonium Concentration Facility being operated was redesignated as the
37 224-T TRUSAF. This closure plan documentation covers only the RCRA regulated portion of the
38 224-T Plutonium Concentration Facility referred to as 224-T TRUSAF. The entire building will be
39 remediated as a decontamination and decommissioning activity as part of a CERCLA removal action.

40 The configuration of 224-T TRUSAF, which is approximately 60 meters long by 18.3 meters wide,
41 allowed for approximately 1,068 square meters of storage space.

42 The three floors of the 224-T TRUSAF are connected by stairway A at the north end of the building, by
43 stairway B at the south end of the building, and by an elevator adjacent to stairway A. There also is a
44 concrete elevator loading deck off the elevator on the outside of the building. The roof contains the

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1 ventilation exhaust equipment and a penthouse. The penthouse contains the elevator mechanical
2 equipment.

3 The first floor contained storage modules, and includes a restroom, an administration office, a heating and
4 ventilation mechanical room, an elevator, a transuranic waste assayer room, and a RTR. The storage
5 modules on the first floor were in open areas and were marked with tape or paint on the floor. The second
6 and third floors also contained open storage modules marked on the floor with tape or paint.

7 The floors of the 224-T TRUSAF were sealed with an epoxy sealant to meet secondary containment
8 requirements. The fire protection system consisted of a dry-pipe fire system. Each floor had emergency
9 exits and fire alarm pull boxes.

10 The 224-T TRUSAF consisted of the following areas:

- 11 • Administration office
- 12 • RTR room
- 13 • Transuranic waste assayer room
- 14 • Assay control room and storage unit operations office
- 15 • Elevator and stairways
- 16 • Heating and ventilation mechanical room
- 17 • Waste storage and holding areas
- 18 • Incoming waste receiving area
- 19 • Storage modules
 - 20 ○ Acids
 - 21 ○ Caustics
 - 22 ○ Mixed waste
 - 23 ○ Nonhazardous

24 1.1.1 Real-Time Radiography Room

25 Real-time radiography was operated from a desk and control terminal. Only one container at a time was
26 staged in this area for x-raying. In the RTR room, a roll-up door was used for building services. The
27 entrance had a 5.08-centimeter high curb with a 0.3-meter long ramp leading down to floor level. The
28 room contains no floor drains. Three personnel entrances to the RTR room were available, all with a
29 5.08-centimeter curb and a 0.3-meter-long ramp.

30 1.1.2 Transuranic Waste Assayer Room

31 Only one container at a time was staged in the transuranic waste assayer room. The transuranic waste
32 assayer room contains the first floor emergency exit. All floor drains in the transuranic waste assayer
33 room are sealed.

34 1.1.3 Assay Control Room and Storage Unit Operations Office

35 The assay control room and storage unit operations office served as the operations center. The
36 transuranic waste assayer was operated from this office. There are no floor drains in the assay control
37 room and storage unit operations office.

38 1.1.4 Elevator and Stairways

39 The elevator and stairways are located on the west side of the storage building service all three floors of
40 the 224-T TRUSAF. The elevator was used for transporting waste to the upper floors for storage, for
41 moving large or heavy equipment, and for out loading waste. Main floor entrances to the elevator are
42 equipped with a 5.08-centimeter curb and a 0.3-meter-long ramp down to floor level. The elevator is not
43 equipped with curbs.

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1 **1.1.5 Heating and Ventilation Mechanical Room**

2 The heating and ventilation equipment in the mechanical room, on the west-central side of the first floor,
3 provided a constant negative pressure with respect to the atmosphere. The heating and ventilation system
4 is currently deactivated. The two entrances from the hallway into the heating and ventilation mechanical
5 room have 5.08-centimeter curbs with 15.24-centimeter-long ramps down to floor level.

6 **1.1.6 Waste Storage Modules**

7 Waste storage modules on all three floors were open-array storage modules, delineated by markings taped
8 or painted on the floor to prevent inadvertent commingling of incompatible waste forms. Incompatible
9 dangerous waste was separated by placement on different floors or in different rooms on the second floor.
10 Transuranic mixed waste was stored based on both transuranic element content and dangerous waste
11 constituents. All floor drains in these areas were sealed with nonshrinking concrete and covered with
12 epoxy sealant.

13 **1.1.6.1 Receiving Area**

14 The receiving area was located in the southeast corner of the first floor. A double metal door was
15 provided for entrance to the receiving area to allow the movement of a forklift. A concrete pad outside of
16 the door was used for unloading waste. The ceiling is two floors high in the extreme southeast portion of
17 the receiving area. A portion of the ceiling is only one floor high and contains a 1-ton crane used for
18 container-over packing operations.

19 **1.1.6.2 Temporary Staging Area**

20 The temporary staging area, located at the southeast end, was used until offloading operations were
21 complete.

22 **1.1.6.3 First Floor Storage Modules**

23 The first floor storage modules were used for short-term storage before examination and transfer of waste
24 to other locations (i.e., upper floor storage, return to generators and/or generating units, Low-Level Burial
25 Grounds), etc. All transuranic mixed waste was separated into compatible modules, two containers high,
26 two containers wide, and as long as necessary to accommodate the amount of the waste.

27 **1.1.6.4 Second Floor Storage Modules**

28 The majority of the second floor was reserved for transuranic waste. Transuranic mixed waste also was
29 stored on the second floor. Transuranic mixed waste containers were stored in open-array modules, two
30 containers wide, and two containers high. Incompatible mixed waste was separated by being placed in
31 different rooms on the second floor.

32 **1.1.6.5 Third Floor Storage Modules**

33 The third floor storage area contained two types of waste storage modules. Modules 3-1 were for
34 transuranic mixed waste. Modules 3-2 were for transuranic waste. No incompatible transuranic mixed
35 waste was stored on the third floor.

36 **1.2 SECURITY INFORMATION**

37 Security information for the Hanford Facility is discussed in Permit Attachment 33, §6.1 Security.

38 The 224-T TRUSAF is posted with signs stating *DANGER-UNAUTHORIZED PERSONNEL KEEP OUT*
39 or an equivalent legend, in black and red letters on a white background. These signs are in English,

1 legible from a distance of 7.6 meters, and visible from all angles of approach. In addition to these signs,
2 the fences around the 200 West Area are posted with signs, printed in English, warning against
3 unauthorized entry. The signs also are visible from all angles of approach. The 224-T TRUSAF also has
4 its own perimeter fencing that remains locked during nonroutine working hours. The perimeter fence has
5 postings to keep unauthorized personnel out, in addition to an access control point trailer (MO-289)
6 within the fenced area.

7 **2.0 CLOSURE STRATEGY AND PERFORMANCE STANDARDS**

8 The 224-T TRUSAF was a clean and well-maintained TSD unit and will be clean closed. Therefore, post
9 closure activities are not anticipated. Closure of the 224-T TRUSAF will be accomplished by integrating
10 the closure activities with the proposed CERCLA removal action for the entire 224-T Plutonium
11 Concentration Facility. Because the entire building will be disposed of in the Environmental Restoration
12 Disposal Facility (ERDF), sampling activities will not be necessary.

13 **2.1 MINIMIZE THE NEED FOR FURTHER MAINTENANCE**

14 Closure of the 224-T TRUSAF by the eventual disposal of the building decontamination and
15 decommissioning materials in ERDF will minimize the need for further maintenance specific to the
16 244-T TRUSAF.

17 **2.2 PROTECTION OF HUMAN HEALTH AND THE ENVIRONMENT**

18 The 224-T TRUSAF will be closed by the eventual disposal of the building into ERDF, which will
19 provide protection for human health and the environment.

20 **2.3 RETURN LAND TO THE APPEARANCE AND USE OF SURROUNDINGS**

21 Future land use determinations will be made following clean closure of the 224-T TRUSAF and
22 disposition of the entire 224-T Plutonium Concentration Facility. The current proposal for the
23 224-T Plutonium Concentration Facility is a 'slab-on grade', which consists of the following primary
24 elements:

- 25 • Remove the nonradiological and radiological hazardous substances from the facility
- 26 • Remove equipment and associated piping
- 27 • Decontaminate/stabilize contamination
- 28 • Demolish structure to grade
- 29 • Dispose of waste generated during these operations
- 30 • Stabilize the area

31 **3.0 CLOSURE ACTIVITIES**

32 The strategy for closure of the 224-T TRUSAF is clean closure. The waste inventory has been relocated
33 to the Central Waste Complex or to another permitted TSD unit. Based on the clean nature of the
34 224-T TRUSAF and the proposed CERCLA removal action for the entire 224-T Plutonium Concentration
35 Facility of decontamination and decommissioning with the material being disposed of in ERDF, sampling
36 will not be performed. Certification of clean closure by an independent registered professional engineer
37 will demonstrate that clean closure performance standards have been met.

38 **3.1 REMOVAL OF DANGEROUS WASTE INVENTORY**

39 The waste inventory has been removed and relocated to the CWC or to another permitted TSD unit.

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1 **3.2 CLOSURE ACTIVITIES**

2 Closure activities will be integrated with the implementation of the Engineering Evaluation/Cost Analysis
3 (EE/CA) for 224-T Plutonium Concentration Facility. The EE/CA proposes that the 224-T facility be
4 decontamination and decommissioned with the material being disposed of in ERDF.

5 **3.2.1 Constituents of Concern for Closure**

6 Sampling for dangerous waste constituents is not anticipated at this time.

7 **3.2.2 Field Logbook**

8 All field activities will be recorded in a field logbook. All entries will be made in ink, signed, and dated.

9 **3.2.3 Reporting**

10 After completion of closure activities, certification will be produced to verify clean closure.

11 **3.2.4 Personnel Training**

12 All personnel involved with the closure activities at the 224-T TRUSAF will receive training concerning
13 the handling of mixed waste.

14 **3.3 SCHEDULE OF CLOSURE**

15 The schedule of closure will be integrated with the 224-T Plutonium Concentration Facility CERCLA
16 removal action.

17 **3.4 AMENDMENT OF PLAN**

18 Amendments to the closure plan, if required, will be prepared as described in WAC 173-303-610(3)(b).

19 **3.5 CERTIFICATION OF CLOSURE**

20 Certification of closure will be prepared as discussed in WAC 173-303-610(6).

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