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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
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December 1, 2004

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

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EDMC

Dear Mr. Schepens:

Re: Review of the Double Shell Tank (DST) Permit Application, Rev. 0b, Notice of Deficiency (NOD) Response Table Submitted to Ecology on June 9, 2004

The Washington State Department of Ecology (Ecology) has reviewed a portion of the response table (as referenced in Hanford Federal Facility Agreement and Consent Order Figure 9-2, Box 4) for the DST Permit Application Rev. 0b. Enclosed are Ecology's responses on Chapters 7 and 8. Ecology will stage submittals of the remaining chapter responses per a discussion with your Tank Farm Contractor.

Please contact me to set up meeting times and location for NOD workshops for the enclosed chapters. If you have any questions regarding this letter, contact me at 372-7912 or Jeff Lyon at 372-7914.

Sincerely,

Brenda K. Jentzen
Permit Lead, Double Shell Tank System
Nuclear Waste Program

BKJ:lkd
Enclosure

cc: See next page



Mr. Roy J. Schepens
December 1, 2004
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cc: Jim Rasmussen, USDOE
Edward Aromi, CH2M
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cc/enc: Richard McNulty, USDOE
Kathy Tollefson, CH2M
Ro Vinson, PAC
Administrative Record: DST and Tank Waste Storage
CH2M Correspondence Control
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**WASHINGTON STATE DEPARTMENT OF ECOLOGY
DOUBLE-SHELL TANK PERMIT APPLICATION NOTICES OF DEFICIENCY
RESPONSE TABLE
11/1/04**

No.	Position in Document	Comments/Response Chapter 7	Regulatory Citation
1.	Chapter 7 7.2.5.1	<p>Replace 7.2.5.1 with the following text. “During the course of receiving dangerous and/or mixed waste at a Tanks Farm Facility, an unanticipated event could be discovered resulting in a discrepancy concerning the waste. Damaged or unacceptable shipments resulting from onsite transfers are not subject to WAC 173-303-370; however, discrepancies must be resolved in order to maintain proper records. Regardless of whether the waste is received as an off-site shipment or onsite transfer, the following actions are taken:</p> <ol style="list-style-type: none"> 1. Operations management is notified of the damaged or unacceptable waste to be received. 2. If the discrepancy results in a spill or release, actions described in Section 7.2.5 are taken. 3. The generating organization is notified of the discrepancy. 4. An operations representative, in conjunction with the generating organization, determines the course of action to resolve the discrepancy. <p>Response: accept, will remove the word ‘on-site’</p> <p>Ecology Response: It is unclear from DOE’s response whether intent is to insert Ecology’s proposed language. Insert text for clarity and enforceability.</p>	
2.	General	<p>The contingency plan, or related document, must contain a “description of the actions which facility personnel must take to comply with...” WAC...-350 and 360. The description of the procedures must contain sufficient detail to ensure the requirements of WAC can be met. Specifically, a detailed description of the planned response to a: tank dome collapse, leaking pipeline, leaking tank, and release to the atmosphere.</p> <p>Response: reject, Attachment A of the DST BEP specifies the procedure (RLEP 1.0 App 1-2 A) that describes the actions taken in response to specific emergency scenarios such as tank dome collapse, leaking pipeline, leaking tank, and release to the atmosphere. These procedures are available to Ecology upon request.</p> <p>Ecology Response: These procedures need to be listed within the BEP. They can be an attachment, but they must be listed in the contingency (BEP) of the DST application.</p>	WAC 173-303-806(4)(a) and WAC 173-303-350(3)(a)

**WASHINGTON STATE DEPARTMENT OF ECOLOGY
DOUBLE-SHELL TANK PERMIT APPLICATION NOTICES OF DEFICIENCY
RESPONSE TABLE
11/1/04**

No.	Position in Document	Comments/Response Chapter 8	Regulatory Citation
1.	General	<p>Identify On-the-Job Training (OJT) needed and a description of the process/procedures for positions at Tank Farms. OJT is not listed.</p> <p>Response: OJT is not addressed in either Chapter 8 Personal Training or Appendix 8A Training Plan because none of the positions require OJT.</p> <p>Ecology Response: "WAC 173-303-330 Personnel training. (1) Training program. The facility owner or operator must provide a program of classroom instruction or on-the-job training for facility personnel. This program must teach personnel to perform their duties in a way that ensures the facility's compliance with this chapter 173-303 WAC ..."</p> <p>Provide a list of tank farm job positions and required training to perform duties. To include mentoring and shadowing, as well as classroom instruction.</p>	