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Department of Energy

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MANAGEMENT

91-EAB-199

AUG 7 1991

Mr. Charles E. Findley
U.S. Environmental Protection Agency
1200 Sixth Avenue
Seattle, WA 98101

Mr. Timothy L. Nord *T. Nord*
Hanford Project Manager
Washington Department of Ecology
Mail Stop PV-11
Olympia, WA 98504-8711

Dear Messrs. Findley and Nord:

NOD RESPONSE TABLE AND PROPOSED REVISED TEXT TRANSMITTAL: 305-B STORAGE UNIT

Ref: Letter, T. L. Nord (Ecology) to S. H. Wisness, "Notice of Deficiency (NOD) for the 305-B Storage Facility," dated April 26, 1991. *13836*

This letter transmits the proposed responses to the NOD noted in the above-referenced letter. Per Ecology's request, the responses are in the form of a NOD response table with proposed revised text attached.

If you have any questions about the attached permit application material, please contact Mr. C. E. Clark of the DOE Field Office, Richland on (509) 376-9333, or Mr. W. J. Bjorklund of Pacific Northwest Laboratory on (509) 376-4781.

Sincerely,

E. A. Bracken

E. A. Bracken, Director
Environmental Restoration Division
Richland Operations Office

ERD:CEC

T. D. Chikalla

T. D. Chikalla, Director
Facilities and Operations
Pacific Northwest Laboratory

Attachment *Re: M. J. as it (notebook)*

cc: T. D. Chikalla, PNL (w/o attch)
D. L. Duncan, EPA (w/attch)
M. E. Lerchen, Ecology (w/attch)
T. M. Michelena, Ecology (w/o attch)



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305-B STORAGE UNIT
DANGEROUS WASTE PART B PERMIT APPLICATION
(REVISION 0)

NOTICE-OF-DEFICIENCY RESPONSE TABLE

EXPLANATION

This Notice Of Deficiency (NOD) Response Table contains all NODs from Ecology NODs of April 26 and September 28, 1990, and April 26, 1991.

Comment Number: A unique number has been assigned to all Notice of Deficiency (NOD) comments. Any Ecology comment can be identified using this number.

Comment/Response:

Ecology Comment: The Ecology comment is listed as contained in the first NOD dated April 26, 1990 or, if noted for the first time, in the second NOD dated September 28, 1990. Page and/or section numbers cited in these comments refer to locations in Revision 0 of the permit application.

Ecology Requirement: The comment is followed by the "Ecology Requirement" also contained in the first NOD of April 26, 1990. This requirement contains an explanation of the basis for the comment.

DOE-RL/PNL Response (No. 1): The DOE-RL/PNL response to the Ecology NOD comments is listed beneath the "Ecology Requirement."

Ecology Comment No. 2: If Ecology did not concur with the DOE-RL/PNL response submitted on July 26, 1990, Ecology made additional comments in the second NOD dated September 28, 1990.

Ecology Requirement No. 2: Clarifications or additional requirements relating to the issue being addressed in the second NOD are presented.

DOE-RL/PNL Response No. 2: This is the DOE-RL/PNL response to the second NOD received from Ecology.

Ecology Comment No. 3: Ecology's response to the proposed revised text submittal, given in the NOD of April 26, 1991.

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DOE-RL/PNL Response No. 3: This is the DOE-RL/PNL response to the third Ecology comment. Where applicable, the reader is referred to the proposed revised text (Revision 0A) of the 305-B permit application.

Ecology Concurrence: If Ecology (conditional) concurrence was received via the second NOD, the date of concurrence is noted (e.g., 9/28/90).

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305-B STORAGE UNIT
PART B APPLICATION NOD RESPONSE TABLE
(REVISION 0)

No.	Comment/Response	Ecology Concurrence
1.	<p><u>Ecology Comment:</u> (No page number) No SEPA checklist has been submitted for this facility.</p> <p><u>Ecology Requirement:</u> A SEPA checklist must be submitted.</p> <p>DOE-RL/PNL Response No.1: A SEPA checklist will be submitted.</p>	9/28/90
2.	<p><u>Ecology Comment:</u> (Page iii, foreword, first paragraph) The plan states that the 305-B storage facility is regulated by RCRA (1976) and AEA (1954).</p> <p><u>Ecology Requirement:</u> The storage of wastes at this facility is not solely regulated by the above acts. Modify the text accordingly. See comment 3 of this NOD.</p> <p>DOE-RL/PNL Response No. 1: The list of acts regulating the facility will be expanded to include the Hazardous Waste Management Act of 1976, Ch. 70-105 RCW, and other laws as noted in Chapter 13 of the application. See also response to comment 94.</p>	9/28/90
3.	<p><u>Ecology Comment:</u> (Page 1-1, Section 1.1, first paragraph) The plan states this facility will be permitted under WAC 173-303-630.</p> <p><u>Ecology Requirement:</u> The facility will be permitted under WAC 173-303-806 and references therein (compliance with WAC 173-303-630 is required under WAC 173-303-806(4)(a)). Revise the text accordingly.</p> <p>DOE-RL/PNL Response No. 1: The reference will be revised.</p>	9/28/90
4.	<p><u>Ecology Comment:</u> (Page 1-1, Section 1-1, second paragraph) The plan states, "Wastes are characterized by the generators in order to designate ..." There is no provision for independent verification by sampling and analysis of the generator's waste designation in this section or elsewhere in this application.</p> <p><u>Ecology Requirement:</u> Ecology requires verification sampling and analysis independent of the generator's characterization; a waste analysis plan to fulfill this requirement must be presented in this permit application and it must meet the minimum requirements of WAC 173-303-300(5). Refer to the 616 Nonradioactive Dangerous Waste Storage Facility Permit Application currently in development.</p> <p>DOE-RL/PNL Response No. 1: As per the Unit Managers' meetings for the 616 and 305-B facilities, designation or verification sampling may be performed by onsite generators in lieu of analysis at the facility as long as controls are established to prevent modification of the waste subsequent to sampling and analysis by the generator. The issue of sampling and</p>	9/28/90

305-B STORAGE UNIT
PART B APPLICATION MOD RESPONSE TABLE
(REVISION 0)

No.	Comment/Response	Ecology Concurrence
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analysis will be further addressed in the site-wide permit for the Hanford Site at a later date. Minor modifications will be made to the text to reflect this point both here and elsewhere in the document in response to similar comments. See also response to Comment 17, where detail is provided on data necessary for acceptance of wastes at the 305-B facility.

5. Ecology Comment: (Page 2-3, Section 2.1.2) This introduction to 305-B does not describe all of the activities that occur in the building. Consequently, some of the issues related to the facility operations are not discussed within the permit application. For example, there is a separate research facility in the southeast corner of the building which is completely unrelated to the waste storage facility. This research facility has an open trench which drains cooling water that passes adjacent to and underneath much of the waste storage area. None of this is presented within the application nor is the fact that there are inadequate physical barriers separating this trench from the high bay storage area.

Ecology Requirement: Other unrelated operations that may impact the 305-B facility must be discussed in the permit application. It is understood that this research facility will be closed and removed by June 1990. See comment 8.

DOE-RL/PNL Response No. 1: Additional information will be added to the application relating to the area where the research module operating in the building is located. The module itself is scheduled to be removed on or about July 31, 1990. Modifications are expected to be made to the facility once the research module is removed. See our response to comment 15 for detail of anticipated facility modifications.

Ecology Comment No. 3: Secondary containment in over-90-day storage facilities must be permanent. See number 23.

DOE-RL/PNL Response No. 3: DOE-RL/PNL still feel that individual secondary containment structures fulfill the requirements of WAC-173-303-630 for secondary containment for container storage. The text will remain unchanged.

6. Ecology Comment: (Page 2-3, Section 2.1.2) The plan states that dangerous waste received in smaller containers is stored in the four storage cells until there is enough to consolidate in a 30- to 55-gallon shipping container. It is not clear from the application how these larger containers are handled while being filled or how they are stored until shipped.

Ecology Requirement: Clarify the fate of wastes from receiving through shipping. Include in this detailed procedures for bulking of wastes; these procedures must be in compliance with

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305-B STORAGE UNIT
PART B APPLICATION NOD RESPONSE TABLE
(REVISION 0)

No.	Comment/Response	Ecology Concurrence
	<p>WAC 173-303-150 and WAC 173-303-161. Note that the storage of the containers must be in compliance with WAC 173-303-630.</p> <p>DOE-RL/PNL Response No. 1: PNL will add more detailed descriptions of the lab packing and waste bulking activities at the 305-B facility.</p> <p><u>Ecology Comment No. 3:</u> It would be more appropriate to describe gloves as "resistant." Impervious suggests that the gloves would not transmit any material.</p> <p>If it is discovered that incompatible materials are mixed, it will be necessary to correct the underlying cause. For example, if the compatibility chart is incorrect, then it must be revised or, conversely, if the wastes were incorrectly designated, then the generator's waste designation must be subjected to greater levels of scrutiny.</p> <p>DOE-RL/PNL Response No. 3: This section will be revised; see proposed revised text attached.</p>	
7.	<p><u>Ecology Comment:</u> (Page 2-3, Section 2.1.2) The ventilation system for the building is not described in the permit application for the main floor, the basement, or the hood area. There is no information on the air flow rates for either the inlet air or exhaust air systems for the building.</p> <p><u>Ecology Requirement:</u> The specifications for the building ventilation systems need to be described in terms of ducting, vents, flow rates, and fan power requirements for both the inlet and exhaust air systems. These specifications need to be prepared for the main floor, hood and basement ventilation systems. Engineering drawings of the ventilation systems need to be prepared and included in the permit application. Performance of the building heating and ventilation system should be described as they relate to temperature variations. A chart of average temperatures at the site by month along with maximum and minimum temperatures could be provided as a means of showing the potential for both freezing and flammability hazards.</p> <p>DOE-RL/PNL Response No. 1: Building specifications and drawings will be provided and attached to the permit application. A brief discussion of temperature variations and climatic conditions relevant to the operation of the facility will be added.</p>	9/28/90
8.	<p><u>Ecology Comment:</u> (Page 2-5, Figure 2-3) Figure 2-3 and Appendix 4A of the 305-B storage facility floor plan do not adequately depict the facility.</p>	

July 26, 1991

Page 5 of 38

305-B STORAGE UNIT
PART B APPLICATION NOD RESPONSE TABLE
(REVISION 0)

No.	Comment/Response	Ecology Concurrence
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Ecology Requirement: Submit a figure (or additional figures) which clearly shows the location of other operations within the building, exits and loading docks, and the access routes between floors. Walls and barriers must be clearly differentiated in the design drawings. In addition, containment systems, including trenches, sumps, and sloping of floors must be illustrated and their dimensions given. The heating and ventilation systems as well as the plumbing must also be depicted and described. This requirement may be fulfilled by submitting as-built drawings and design and performance specifications for the building. Note that plans for changes to the building (such as removal of the research facility in the high bay area) must be submitted to Ecology for approval prior to construction. See comment 15.

DOE-RL/PNL Response No. 1: Figure 2-3 will be revised to include the complete exterior dimensions of the building and the information requested. Figure 2-3 may be reissued as a series of figures to satisfy this information requirement. Appendix 4A will be expanded to include other drawings, up to a complete set of building drawings as was done for the 616 facility.

Ecology Comment No. 3: This (revised Figure 2-3 submitted as proposed revised text) does not satisfy this deficiency comment. This figure (or figures) must clearly show exits, loading docks, and access routes between floors. Walls and barriers must be clearly differentiated in the design drawings. In addition, containment systems, including trenches, sumps, and sloping of floors must be illustrated with dimensions.

DOE-RL/PNL Response No. 3: Based in discussions with Ecology in the Unit Managers' Meeting of June 4, this figure need not be revised until Ecology has reviewed the supplemental blue line drawings added to Appendix 2A and the revised Figures 4-2 through 4-10. See proposed revised text.

9. Ecology Comment: (Page 2-6, Section 2.2.1) The topographic maps provided in Appendix 2A depict only 840 ft of the area to the west of the 305-B building; the topographic maps must show 1000 ft around the facility. 9/28/90
Ecology Requirement: Submit map(s) which fulfill this requirement.

DOE-RL/PNL Response No. 1: A series of topographic maps showing the area west of the railroad tracks (the western bound of the existing maps provided in Appendix 2A) will be added to Appendix 2A.

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305-B STORAGE UNIT
PART B APPLICATION NOD RESPONSE TABLE
(REVISION 0)

No.	Comment/Response	Ecology Concurrence
10.	<p><u>Ecology Comment:</u> (Page 2-6, Section 2.2.1) The plan states that plates 2-2 through 2-7 in Appendix 2A provide the information required under WAC 173-303-806(4)(a). This is misleading, in addition to not meeting the specific requirements for final facility maps, there are additional requirements under this regulation that could not be met by any map (see, for instance, WAC 173-303-806(4)(a)(ii).</p> <p><u>Ecology Requirement:</u> Edit or delete this statement.</p> <p>DOE-RL/PNL Response No. 1: Appendix 2A is submitted to meet the requirements of WAC 173-303-806(4)(a)(xviii) and the text will be edited accordingly.</p>	9/28/90
11.	<p><u>Ecology Comment:</u> (Page 2-8, Section 2.3.2) Typographical error, should be "... would be affected ..."</p> <p><u>Ecology Requirement:</u> Edit accordingly.</p> <p>DOE-RL/PNL Response No. 1: Change the wording accordingly.</p>	9/28/90
12.	<p><u>Ecology Comment:</u> (Page 2-10, Section 2.4) This description does not give the estimated traffic volumes on roads serving the 305-B facility as required under WAC 173-303-806(4)(a)(x).</p> <p><u>Ecology Requirement:</u> For a given time period (week or month), describe the number and kinds of vehicles that use these roads.</p> <p>DOE-RL/PNL Response No. 1: A description of traffic types and volumes will be added to the text.</p>	9/28/90
13.	<p><u>Ecology Comment:</u> (Page 2-13, Section 2.5.8) The plan states that because the facility is being permitted solely as a storage facility, not a treatment facility, it is not necessary to take any measures to reduce the amount of waste materials. This assumption is incorrect, 305-B is required to recycle or reclaim waste materials under WAC 173-303-283(h); there is already a redistribution program for excess laboratory chemicals in place.</p> <p><u>Ecology Requirement:</u> Any measure that would fulfill the above requirement must be described in this section and implemented at the facility.</p> <p>DOE-RL/PNL Response No. 1: The text of Section 2.5.8 will be revised to refer the reader to the waste minimization plan shown in Section 10 of the application. Section 10 will be revised to describe the chemical redistribution program.</p>	

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305-B STORAGE UNIT
PART B APPLICATION NOD RESPONSE TABLE
(REVISION 0)

No.	Comment/Response	Ecology Concurrence
14.	<p><u>Ecology Comment:</u> (Page 2-13, Section 2.5.8) The permit application does not discuss where wastes are sent for treatment and/or disposal.</p> <p><u>Ecology Requirement:</u> Describe where wastes are sent from the 305-B facility in terms of the requirements of WAC 173-303-283(h).</p> <p>DOE-RL/PNL Response No. 1: A paragraph will be added to Section 2.5.8 explaining how selection of offsite treatment or disposal is determined and expressing preference for recycling or treatment prior to, or in lieu of, disposal.</p>	9/28/90
15.	<p><u>Ecology Comment:</u> (Page 2-13, Section 2.5.9) The plan states that there are physical controls to prevent release of spilled waste materials to the environment. The controls are inadequate in a number of areas.</p> <p><u>Ecology Requirement:</u> Effective physical controls for preventing introduction of waste materials from this facility to the environment must be instituted; these must be in compliance with the requirements of WAC 173-303-630(7) through -630(9). If physical changes to the facility are necessary to be in compliance with these regulations, design drawings and specifications must be submitted to Ecology for approval prior to construction. The following is a list of specific areas that need correction:</p> <ul style="list-style-type: none"> • The drain in the high bay sump is inadequately blocked; • The sink in the high bay area has no controls for drainage; • The research facility cooling water trench has inadequate controls for entry of contaminants; • The RMW flammable materials has inadequate storage capacity. 	

See also numbers 8, 16, 23, 36, 41, 43, 46, 58, 59, and 60.

DOE-RL/PNL Response No. 1: Certain physical modifications will be made to the facility following the removal of the research module as noted in our response to comment 5. These modifications will be presented to Ecology for informal review prior to construction. It is noted, however, that WAC 173-303 does not require Ecology notification or approval of facility revisions under interim status unless it is of the type described in WAC 173-303-281.

The exact modifications planned are subject to management approval and funding, and thus cannot be detailed here; however, it is expected that the drain blocked in 1981 will be

9413137.1586

305-B STORAGE UNIT
PART B APPLICATION NOD RESPONSE TABLE
(REVISION 0)

No.	Comment/Response	Ecology Concurrence
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permanently blocked using cement/grout and epoxy coated; the area where the research module currently is located will be incorporated into the high bay storage area; the drain in the (former) research facility cooling water trench will be blocked; the sink in the high bay area will be removed; and appropriate secondary containment structures, such as drip pans or pallets with secondary containment devices, provided to accommodate high bay storage for drums. See response to comment 23 for the concerns on flammable RMW storage.

Ecology Comment No. 2: USDOE/PNL anticipates that certain facility modifications will be made to the 305-B Building. It is asserted that Ecology notification or approval is not required for this under interim status unless it is the type described in WAC 173-303-281. Although this unit is operating under interim status standards, the permit application is being made under final facility standards. Approval of design is required. Note also that changes to interim status facilities and their permits are required to be in compliance with WAC 173-303-805(7).

Ecology Requirement No. 2: The anticipated 305-B Building modifications will probably satisfy Ecology's concerns regarding the structure except for the following:

- The drain in the former research area's sump must be blocked immediately as discussed at the Unit Manager's Meeting of August 20, 1990.
- Secondary containment structures such as drip pans are not acceptable in a permanent TSD facility.
- No mention of physical barriers to segregate incompatible waste types is made; these are required as noted in NOD comment number 41.

DOE-RL/PNL Response No. 2: Several modifications to the unit have been made to address Ecology's concerns as stated in the first NOD. These modifications were made in compliance with the interim status requirements of WAC 173-303-805 and did not increase the types or quantities of wastes handled, nor did they amount to reconstruction of the facility. The modifications are reflected in several areas of the revised permit application, most notably in Section 4.1.1.6 (see responses to comments 41 and 42) and are summarized as follows:

- The "inadequately blocked" drain on the west side of the high bay has been scheduled for removal of the temporary block and grouting per July Unit Manager's meeting.
- The sink on the south wall of the facility has been removed. (The drain led to the research facility sump.)

305-B STORAGE UNIT
PART B APPLICATION NOD RESPONSE TABLE
(REVISION 0)

No.	Comment/Response	Ecology Concurrence
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- The drain in the research facility sump has been blocked by adding a standpipe with a welded cap and encasing the standpipe in concrete except for the top six inches.
- Three new segregation areas for storage of drum quantity wastes (to protect against incompatibility reactions) have been installed and the sumps in the former research facility blocked to provide segregated secondary containment for these areas. These areas have physical barriers to prevent mixing of incompatible waste in the event of a simultaneous release and allow other areas of the high bay to be utilized for other waste streams.

For response to the issue of using drip pans or other structures as secondary containment, see our response to comment 23.

16. Ecology Comment: (Page 2-14, Section 2.6.1) The specifications met in order to comply with the Uniform Fire Code's "American Table of Distances for Storage of Explosives, Table 77-201" for reactive waste buffer zones are not described. 9/28/90

Ecology Requirement: Describe the distances and manner of storage used for reactive wastes that comply with the latest version of the Uniform Fire Code as required under WAC 173-303-630(8)(a). Demonstrate that all explosives in the facility are properly stored according to these guidelines.

DOE-RL/PNL Response No. 1: Buffer distances and storage plans for these materials are shown in our response to Ecology Comments 41, 42, and 57. The text of Section 2.6.2 will be revised to indicate its applicability in lieu of Section 2.6.1 for the materials shown in Section 2.6.2.

17. Ecology Comment: (Page 2-17, Section 2.8.1) The plan states that generator information is verified by the waste management organization prior to acceptance for shipping to the 305-B storage facility. The actual verification procedure for the waste materials is not clear in this section nor is it clarified in the following sections within this chapter relating to this topic (sections 2.8.2-2.8.3.1).

Ecology Requirement: This procedure needs to be discussed in greater detail. It must include the criteria for acceptance and/or rejection of a generator disposal request as well as acceptance of wastes at the facility. See comment 4.

DOE-RL/PNL Response No. 1: Section 2.8.1 will be expanded to describe the actual verification procedures utilized for waste disposal requests. Information necessary for

305-B STORAGE UNIT
PART B APPLICATION NOD RESPONSE TABLE
(REVISION 0)

No.	Comment/Response	Ecology Concurrence
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acceptance by the facility will be indicated by reference to Chapter 3, Waste Analysis Plan. See also response to Ecology Comments 4, 90 and 91.

Ecology Comment No. 3: No sampling and analysis criteria for verification of waste designation are described. These are required. Refer to the Hanford Facility-Wide Part B permit in development for guidance.

DOE-RL/PNL Response No. 3: DOE-RL and contractors are preparing a sitewide waste analysis plan for dangerous waste management units. DOE-RL and contractors are also pursuing a resolution of this issue through the sitewide issues meetings. Pending such resolution, the text will remain unchanged.

18. Ecology Comment: (Page 2-17, Section 2.8.2) In the event a discrepancy between a shipment and its manifest does occur, WAC 173-303-370 requires reconciliation with the generator. A description of how discrepancies will be resolved has not been provided.

Ecology Requirement: Explain how any discrepancies will be resolved including how the resolution will be determined.

DOE-RL/PNL Response No. 1: This section will be expanded to describe discrepancy resolution criteria.

Ecology Comment No. 3: The quoted text contains inconsistent statements. Clarify what procedures and time-frames are applicable in resolving manifest discrepancies. Also describe what will be done if waste verification analyses results in discovery of waste designation discrepancies.

DOE-RL/PNL Response No. 3: The text will be clarified to note that reporting may be an issue only when discrepancies surface after receipt, e.g. discovery of waste designation discrepancies. See proposed revised text.

19. Ecology Comment: (Page 3-2, Section 3.1) The plan mentions "flash cans".

Ecology Requirement: Please define "flash cans".

DOE-RL/PNL Response No. 1: This section will include this definition.

9/28/90

305-B STORAGE UNIT
PART B APPLICATION NOD RESPONSE TABLE
(REVISION 0)

No.	Comment/Response	Ecology Concurrence
20.	<p><u>Ecology Comment:</u> (Page 3-2, Section 3.1) The permit application discusses "discarded chemical products". Note that this class of materials is specifically defined in WAC 173-303-081.</p> <p><u>Ecology Requirement:</u> Document that the materials discussed are discarded chemical products as defined under WAC 173-303-081. State this clearly within the text of the permit application.</p> <p>DOE-RL/PNL Response No. 1: The reference will be revised.</p>	9/28/90
21.	<p><u>Ecology Comment:</u> (Page 3-2, Section 3.1) The plan states that P and U wastes in opened containers will be designated on the generator's assurance that the material is in its original container; these materials will not be sampled.</p> <p><u>Ecology Requirement:</u> This is inadequate, all opened containers due for disposal are subject to the same verification sampling and analysis that any other waste is subject to. See comment 4.</p> <p>DOE-RL/PNL Response No. 1: As in our response to comment 4, generators provide certification of the contents of discarded chemical product containers. Lab pack disposal of discarded reagent chemicals has occurred for many years and independent verification of discarded reagents in their original containers is not performed. The text will remain unmodified.</p>	9/28/90
22.	<p><u>Ecology Comment:</u> (Page 3-2, Section 3.1) The plan states that some radioactive mixed waste will be designated on the basis of the generator's knowledge (process knowledge). The sole use of process knowledge for waste designation is not adequate.</p> <p><u>Ecology Requirement:</u> Some part of the waste stream must be subject to verification sampling and analysis independent of generator influence. See comment 4.</p> <p>DOE-RL/PNL Response No. 1: See responses to Comments 4 and 17.</p>	9/28/90
23.	<p><u>Ecology Comment:</u> (Page 3-3, Section 3.1) The permit application states that flammable RMW is stored above grade in a flammable storage cabinet. During a site visit (3/19/90) it was noted that several 55 gallon drums containing RMW flammable liquids were stored next to the RMW flammable cabinet. This part of the facility has no capacity for secondary containment in case of spills or leaks as required under WAC 173-303-630(7)(a).</p> <p><u>Ecology Requirement:</u> Cease storage of materials in areas that do not meet the secondary storage capacity requirements of WAC 173-303-630(7) immediately. Note that this requirement</p>	

305-B STORAGE UNIT
PART B APPLICATION NOD RESPONSE TABLE
(REVISION 0)

Ecology
Concurrence

No. Comment/Response

also applies to the high-bay storage area; it must be inspected for secondary containment capacity with regard to the amount of materials stored. In order to allow storage in these disallowed areas, design proper storage environment and submit plans to Ecology prior to any physical changes to the facility. See comments 5, 6, 15, and 23.

DOE-RL/PNL Response No. 1: Secondary containment for containers of flammable RMW which are too large or too numerous to fit into existing secondary containment structures will be stored in overpack drums or other suitable secondary containment devices (such as drip pans or pallets with secondary containment devices) within the RMW storage area. This revision will be noted in the permit application. Storage in the high bay storage area will be addressed in our response to comment 41.

Ecology Comment No. 2: Secondary containment requirements for flammable RMW will be met by "suitable secondary containment structures."

Ecology Requirement No. 2: Drip pans or other temporary structures are not acceptable as secondary containment devices by Ecology for permanent TSD facilities. Permanent secondary containment as specified in WAC 173-303-630(7)(a) is required. See comment 41.

DOE-RL/PNL Response No. 2: This issue will be discussed as part of the sitewide Part B issues resolutions.

Ecology Comment No. 3: As stated in the previous NOD, "Drip pans or other temporary structures are not acceptable as secondary containment devices by Ecology for over-90 day storage facilities. Permanent secondary containment as specified in WAC 173-303-630(7)(a) is required."

DOE-RL/PNL Response No. 3: DOE-RL/PNL still believe that individual secondary containment structures meet the letter and spirit of the regulatory requirements specified in WAC 173-303-630(7)(a) and elsewhere. The text will remain unmodified.

24. Ecology Comment: (Page 3-3, Section 3.1) Sole reliance on generator knowledge for waste designation is inadequate.

9/28/90

Ecology Requirement: Verification sampling and analysis is required. See comment 4.

DOE-RL/PNL Response No. 1: See response to comments 4 and 17.

305-B STORAGE UNIT
PART B APPLICATION NOD RESPONSE TABLE
(REVISION 0)

No.	Comment/Response	Ecology Concurrence
25.	<p><u>Ecology Comment:</u> (Page 3-4, Section 3.1.1) The permit application states that the facility meets the requirements of WAC 173-303-630(7)(c) and therefore does not need to demonstrate that the containers do not contain free liquids.</p> <p><u>Ecology Requirement:</u> State clearly, with design drawings, how the 305-B facility is in compliance with the requirements for container storage under WAC 173-303-630(7) and -630(9). At a minimum this must include container, cabinet, and shelving locations; dimensions for floor elevations, physical barriers, and container volumes; locations and identifications for different types of wastes. Refer to the 616 Nonradioactive Dangerous Waste Storage Facility Permit Application currently being written for guidance. See also numbers 5, 6, 15, and 16.</p> <p>DOE-RL/PNL Response No. 1: See responses to comments 8, 41, and 42.</p>	9/28/90
26.	<p><u>Ecology Comment:</u> (Page 3-5, Section 3.2) Process knowledge is not acceptable without verification sampling.</p> <p><u>Ecology Requirement:</u> Verification sampling and analysis is required. See comment 4.</p> <p>DOE-RL/PNL Response No. 1: See response to comments 4 and 17.</p>	9/28/90
27.	<p><u>Ecology Comment:</u> (Page 3-6, Section 3.2) The plan gives a brief description of how containers are labeled at 305-B. This description does not demonstrate that the containers will be labeled as required for shipment on roads with public access under the Dangerous Waste regulations.</p> <p><u>Ecology Requirement:</u> Container labeling must comply with the provisions of WAC 173-303-190 and WAC 173-303-630(3). State clearly in the application (preferably with illustrations) how the facility is in compliance with these requirements.</p> <p>DOE-RL/PNL Response No. 1: Reference will be made to WAC 173-303-190 to assure that packagings carried over public-access roads are labeled and manifested in compliance with DOT regulations. A description of this procedure will be added.</p>	
	<p><u>Ecology Comment No. 2:</u> Containers carried over public roads will be labeled and manifested in compliance with DOT regulations. Under WAC 173-303-630(3), containers must be labeled, "in a manner which adequately identifies the major risk(s) associated with the contents of the containers for employees, emergency response personnel and the public ..." When the labeling requirements of 49 CFR Part 72 (sic) meet the requirements of WAC 173-303, they must be implemented. It should be noted, however, that some wastes present risks (e.g.,</p>	

305-B STORAGE UNIT
PART B APPLICATION NOD RESPONSE TABLE
(REVISION 0)

No.	Comment/Response	Ecology Concurrence
	<p>carcinogenicity, persistence, toxicity, etc.) which are not adequately covered by 49 CFR Part 172 and additional labeling of the containers is required for the purposes [of] WAC 173-303. This labeling must also meet the labeling requirements of WAC 173-303-200(d) for dangerous waste accumulation.</p> <p><u>Ecology Requirement No. 2:</u> Ensure that the above requirements are met; container labeling must also be addressed within the scope of the permit application. Refer to the 616 NRDWSF Permit Application for guidance.</p> <p>DOE-RL/PNL Response No. 2: Section 3.2 will be revised to reflect compliance at the generating unit with the requirements of 173-303-630(3), and compliance with WAC 173-303-190 prior to transport over public-access roads.</p> <p><u>Ecology Comment No. 3:</u> Container labeling must be described in detail. Refer to the 616 Nonradioactive Dangerous Waste Storage Facility Part B Permit Application for guidance.</p> <p>DOE-RL/PNL Response No. 3: Per our discussion in the Unit Managers' Meeting of June 4, a description of how state-only wastes will be labeled has been added. See proposed revised text.</p>	
28.	<p><u>Ecology Comment:</u> (Page 3-8, Section 3.2) The text states, "Visual validation as a physical procedure is strongly relied on to confirm the nature of waste collected or sampled, and to determine the accuracy of the disposal request information received from the generator." Visual inspection provides a very limited means of verifying the waste identity; a visual inspection of the exterior of a container gives no information about its contents.</p> <p><u>Ecology Requirement:</u> Ecology is requiring institution of a verification sampling and analysis program of some part of the waste stream. Sole reliance on visual validation of shipments is not adequate. See comment 4.</p> <p>DOE-RL/PNL Response No. 1: See response to comments 4 and 17.</p>	9/28/90
29.	<p><u>Ecology Comment:</u> (Page 3-9, Section 3.2) The permit application states that when containers are transported over roads accessible to the public, the vehicles are marked with the appropriate DOT placard. It is not clear if the containers themselves conform to the labeling requirements of WAC 173-303-145 and WAC 173-303-630.</p> <p><u>Ecology Requirement:</u> Clarify the labeling procedures.</p>	9/28/90

305-B STORAGE UNIT
PART B APPLICATION NOD RESPONSE TABLE
(REVISION 0)

No.	Comment/Response	Ecology Concurrence
	DOE-RL/PNL Response No. 1: See response to comment 27.	
30.	<p><u>Ecology Comment:</u> (Page 3-10, Section 3.2) The plan mentions "small" containers of RMW.</p> <p><u>Ecology Requirement:</u> Quantify what is meant by "small".</p> <p>DOE-RL/PNL Response No. 1: The text will be modified to add the notation that small containers refer to containers of five gallons or less capacity.</p> <p><u>Ecology Comment No. 3:</u> Temporary secondary containment structures are not acceptable in an over-90 day storage facility. See number 23.</p> <p>DOE-RL/PNL Response No. 3: See response to number 23.</p>	
31.	<p><u>Ecology Comment:</u> (Page 3-10, Section 3.2) This paragraph discusses recordkeeping and inventory control. Labeling and management of recycled materials is not clear nor is labeling of waste materials.</p> <p><u>Ecology Requirement:</u> Document that the recordkeeping and inventory control procedures comply with WAC 173-303-016, -017, and -190.</p> <p>DOE-RL/PNL Response No. 1: Recycled materials are not managed (per WAC 173-303-016) at the 305-B facility nor is recycling done at the facility. Recyclable materials are managed at the facility, however, and are managed in the same manner as dangerous wastes. This is necessary since not all recyclable materials are actually redistributed for reuse as described in our response to comment 13, i.e. users cannot always be found for these recyclable materials. The text will be revised to note the management of these recyclable materials in the same manner as other wastes.</p>	9/28/90
32.	<p><u>Ecology Comment:</u> (Page 3-11, Section 3.2.2) The permit application references two sources for appropriate testing methods. The acceptable test procedures for designation are stipulated under WAC 173-303-110(3).</p> <p><u>Ecology Requirement:</u> Document that all testing methods used in the designation of materials are equivalent to those in the above regulation and modify the text accordingly in all applicable areas. Note that Ecology will be replacing EP TOX with Toxic Characteristic Leach Procedure (TCLP) in the next revision of the Dangerous Waste Regulations, Chapter 173-303 WAC.</p>	9/28/90

305-B STORAGE UNIT
PART B APPLICATION NOD RESPONSE TABLE
(REVISION 0)

No.	Comment/Response	Ecology Concurrence
	DOE-RL/PNL Response No. 1: Revise the text to reference WAC 173-303-110(3). The original text was intended to reflect it. This will automatically incorporate the TCLP-for-EPT test revision when it takes place.	
33.	<p><u>Ecology Comment:</u> (Page 3-11, Section 3.2.3) The sampling procedures for different types of materials are discussed.</p> <p><u>Ecology Requirement:</u> Demonstrate that all sampling methods are equivalent to those stipulated in WAC 173-303-110(2) and modify the text accordingly in all applicable areas.</p> <p>DOE-RL/PNL Response No. 1: Revise the text to reference WAC 173-303-110(2) for selection of appropriate sampling methods.</p> <p><u>Ecology Comment No. 3:</u> Section 9.2 of SW-846 describes a process for developing a sampling and analysis plan. Development of such a plan is what has been requested in past NOD's and unit manager's meetings for this unit. This topic has been partially remanded to the Hanford Facility-Wide Part B Permit. USDOE and its contractors must develop and implement a sampling and analysis plan for designation of solid wastes. Simple reference to a process for development of such a plan is not adequate.</p> <p>DOE-RL/PNL Response No. 3: See response to number 17.</p>	
34.	<p><u>Ecology Comment:</u> (Page 4-1, Section 4.1.1.1) The application states that containers in "poor condition or inadequate for storage" are not accepted at the facility.</p> <p><u>Ecology Requirement:</u> State clearly what the criteria is for "poor condition or inadequate for storage". Clarify if these containers are not shipped from the generator site or if they are shipped and then refused acceptance at 305-B. State clearly in the permit application the procedure and criteria for refusing shipment.</p> <p>DOE-RL/PNL Response No. 1: The text will be revised to define "poor condition" and specify container rejection location, and refusal criteria. Response to receipt of such containers at 305-B (damaged in transit, etc.) will be addressed in our response to Comment 70.</p>	9/28/90
35.	<p><u>Ecology Comment:</u> (Page 4-1, Section 4.1.1.1) The permit application states that shipping containers are DOT-specified and approved for packaging according to 49 CFR 172.101 and 49 CFR 178. Under WAC 173-303-190 all dangerous wastes shall be packaged in accordance with 49 CFR Parts 173, 178, and 179 prior to off-site shipment.</p>	9/28/90

305-B STORAGE UNIT
PART B APPLICATION NOD RESPONSE TABLE
(REVISION 0)

No.	Comment/Response	Ecology Concurrence
	<u>Ecology Requirement:</u> Document that operations are in compliance with WAC 173-303-190 and describe this in the text.	
	DOE-RL/PNL Response No. 1: This paragraph will be revised to assure compliance with the above regulation through reference.	
36.	<p><u>Ecology Comment:</u> (Page 4-1, Section 4.1.1.2) Procedures for moving containers within the facility have not been described (WAC 173-303-630). Also, aisle space and storage configuration are not discussed or referenced in this section.</p> <p><u>Ecology Requirement:</u> Provide a detailed description of all container management practices, including loading and unloading and movement and storage of containers within the facility. Include in this description details on aisle space maintained and maximum storage configuration, including number of containers, volume and stacking height of containers for each area; this must be in compliance with WAC 173-303-340(3) and -630. Note that Ecology requires a minimum 3 foot aisle space.</p> <p>DOE-RL/PNL Response No. 1: Container handling practices will be detailed in this section. Storage configurations will be addressed in our response to comments 41 and 57.</p>	9/28/90
37.	<p><u>Ecology Comment:</u> (Page 4-2, Section 4.1.1.2) Currently, crushed glass from empty containers is disposed of at the Hanford Central Landfill.</p> <p><u>Ecology Requirement:</u> Although empty crushed glass containers are no longer subject to the Dangerous Waste Regulations, they must be disposed of at a solid waste landfill which meets the minimal functional standards in chapter 173-304 WAC or other more stringent local standards. Document that wastes are disposed of in accordance with applicable laws and regulations and modify the text of the permit application accordingly.</p> <p>DOE-RL/PNL Response No. 1: The text will be modified to state that these materials are managed in the same manner as other nondangerous solid waste. No mention of specific facilities will be made since location of disposal may change from time to time.</p>	9/28/90
38.	<p><u>Ecology Comment:</u> (Page 4-2, Section 4.1.1.4) A chemically resistant sealant paint was used to coat the concrete base of the storage area(s).</p> <p><u>Ecology Requirement:</u> Describe the sealant's performance specifications, date of application, period for reapplication, repair procedures, and where it was applied.</p>	

305-B STORAGE UNIT
PART B APPLICATION NOD RESPONSE TABLE
(REVISION 0)

No.	Comment/Response	Ecology Concurrence
	DOE-RL/PNL Response No. 1: Information on the sealant paint will be included in the revised permit application. Repair procedures and reapplication times will be addressed.	
	<u>Ecology Comment No. 3:</u> State which product(s) was used to seal the floors. The schedule for reapplication of the sealant and the criteria for any off-schedule repairs must be presented.	
	DOE-RL/PNL Response No. 3: The product identity (from Appendix 4A) will be repeated in the text for the convenience of the reader. Reapplication and repair criteria will be expanded upon in the text. See proposed revised text.	
39.	<u>Ecology Comment:</u> (Page 4-2, Section 4.1.1.5) A "ventilation hood area" is mentioned. <u>Ecology Requirement:</u> Specify where the "ventilation hood area" is located. Also, detail its uses and performance specifications.	9/28/90
	DOE-RL/PNL Response No. 1: Revise the text to read "flammable liquid bulking module" to clarify that it is the same area as described in earlier sections.	
40.	<u>Ecology Comment:</u> (Page 4-2, Section 4.1.1.5) The application states that a number of areas are bermed and canted to individual sumps. Under WAC 173-303-630(7)(a)(i) the containment system must be sloped or otherwise designed and operated to drain and remove liquids resulting from leaks or spills unless the containers are elevated or otherwise protected from contact with accumulated liquids. <u>Ecology Requirement:</u> Demonstrate clearly in the permit application by design drawings and description that the above requirements are being met in all areas of the 305-B building where dangerous wastes are being handled or stored. Note that this requirement includes the loading docks, high bay, and RMW storage areas.	9/28/90
	DOE-RL/PNL Response No. 1: For containment details, see responses to comments 8 and 23. For configuration of storage, see response to comments 41 and 57.	
41.	<u>Ecology Comment:</u> (Page 4-2, Section 4.1.1.6) Secondary containment volumes are discussed, however no mention of the actual volumes of wastes and individual waste types stored in the facility is made here or elsewhere in this application, nor is it clear what locations different waste types are stored in the high bay and RMW storage areas. Note that under WAC 173-303-630(9)(c), "A storage container holding a dangerous waste that is incompatible with	

305-B STORAGE UNIT
PART B APPLICATION NOD RESPONSE TABLE
(REVISION 0)

No.	Comment/Response	Ecology Concurrence
-----	------------------	------------------------

any waste or other materials stored nearby ... must be separated from the other materials or protected from them by means of a dike, berm, wall, or other device."

Ecology Requirement: State clearly what volumes of wastes and container types are stored in which locations. Demonstrate compliance, preferably with design drawings, with the incompatible waste segregation requirement of WAC 173-303-630(9)(c). Refer to the 616 Nonradioactive Dangerous Waste Storage Facility Permit Application for guidance.

DOE-RL/PNL Response No. 1: A narrative will be inserted describing the types and quantities of wastes stored in the various facility areas. Capacity controls will be described as well. Containment volumes and adequacy will be described in detail. Use of drip pans for certain hazard classes of waste will be proposed to fulfill the incompatible waste segregation requirements. Drawings to supplement this narrative will be provided in our response to comment 42.

Ecology Comment No. 2: A narrative will be provided that describes the types and quantities of wastes stored in the 305-B unit. Capacity controls, containment volumes, and adequacy will also be described. Use of drip pans for certain hazard classes of waste will be proposed to fulfill the incompatible waste segregation requirements.

Ecology Requirement No. 2: The proposed narrative may fulfill Ecology's request for storage information if presented in conjunction with storage area diagrams. However, the use of drip pans to fulfill the requirements of WAC 173-303-630(9)(c) for incompatible waste segregation is not acceptable; a physical barrier is required. See comment 23.

DOE-RL/PNL Response No. 2: See response to comment 23 regarding drip pans.

Ecology Comment No. 3: This (incompatible waste areas segregated by 3½" x 6" angle iron bolted to the floor) does not fulfill the requirement of WAC 173-303-630(9)(c); the storage areas for incompatible wastes must be separated, "... by means of a dike, berm, wall, or other device." It is unfortunate that the building modification plans were not submitted to Ecology prior to installation of these unacceptable devices, however, a satisfactory segregation device must be installed. Before further building modifications are conducted, plans should be submitted to Ecology for review.

DOE-RL/PNL Response No. 3: DOE-RL/PNL still believes that the devices in place qualify as a "dike, berm, wall or other device" specified in WAC 173-303-630(9)(c). Only in the most catastrophic scenarios can these devices be expected to fail. DOE-RL/PNL have requested

305-B STORAGE UNIT
PART B APPLICATION NOD RESPONSE TABLE
(REVISION 0)

No.	Comment/Response	Ecology Concurrence
	written guidance from Ecology as to what they consider to meet the WAC requirement stated above; Ecology has not provided this guidance. Pending resolution of this issue, the text will remain unmodified. See also response to comment 5.	
42.	<p><u>Ecology Comment:</u> (Page 4-3, Figure 4-1) Figure 4-1 does not adequately illustrate the layout of waste storage locations, particularly in the high bay and RMW storage areas.</p> <p><u>Ecology Requirement:</u> Edit, replace, or add figure(s) which will clearly illustrate the locations assigned to various types of waste.</p> <p>DOE-RL/PNL Response No. 1: Figure 4-1 will be replaced by a series of figures providing more detailed descriptions of waste storage modules. See also response to comment 41.</p>	
43.	<p><u>Ecology Comment:</u> (Page 4-4, Section 4.1.1.7) It is not clear that waste materials spilled in the high bay storage area will be adequately contained to prevent run-off.</p> <p><u>Ecology Requirement:</u> Demonstrate that run-off will not occur. This may be fulfilled by demonstrating compliance with the requirements of WAC 173-303-630(7) through -630(9).</p> <p>DOE-RL/PNL Response No. 1: See response to comment 41.</p>	9/28/90
44.	<p><u>Ecology Comment:</u> (Page 4-4, Section 4.1.1.8) This discussion of spilled waste material removal from containment sumps is too simplistic and lacks detail for the problems that can be encountered in a spill situation.</p> <p><u>Ecology Requirement:</u> Elaborate this topic to include different responses for specific dangerous materials that may be present in the facility (for example, explain how flammable or highly corrosive materials are to be handled).</p> <p>DOE-RL/PNL Response No. 1: This section will be expanded to include several special-case scenarios where the standard method described previously might not apply, and addressing some of the safety issues that might be posed by spills.</p> <p><u>Ecology Comment No. 2:</u> Section 4.1.1.8 will be expanded to include several special-case scenarios for spill cleanup.</p> <p><u>Ecology Requirement No. 2:</u> This issue may also be addressed by reference to the appropriate section of the 305-B Storage Facility contingency plan. Provide this information to Ecology for review prior to issuance of the next revision of the permit application.</p>	

305-B STORAGE UNIT
PART B APPLICATION NOD RESPONSE TABLE
(REVISION 0)

No.	Comment/Response	Ecology Concurrence
	DOE-RL/PNL Response No. 2: Reference has been made in this section to the contingency plan, but the section has still been enlarged to describe response to small spills where the contingency plan might not be activated, at the discretion of the BED. The revised draft contingency plan will be provided to Ecology for review as requested prior to redraft of the permit application.	
45.	<p><u>Ecology Comment:</u> (Page 4-4, Section 4.2) The permit application states that all containers are located in storage cells. This statement is misleading; for example, the high bay storage area is not depicted as a storage cell in the diagrams provided nor is it referred to as such in the text.</p> <p><u>Ecology Requirement:</u> Edit the text so that it is self-consistent.</p> <p>DOE-RL/PNL Response No. 1: The text will be edited to reflect actual facility operations.</p>	9/28/90
46.	<p><u>Ecology Comment:</u> (Page 4-4, Section 4.3.1) The permit application states that individual containers of ignitable and reactive wastes are stored in individual flammable material storage cabinets within the storage cells. This assertion obviously does not apply to containers too large to be placed in the cabinets.</p> <p><u>Ecology Requirement:</u> State the amounts and types of containers that may be stored in the individual flammable materials cabinets. Describe how containers too large for the cabinets are stored so that they comply with the requirements of WAC 173-303-630(8).</p> <p>DOE-RL/PNL Response No. 1: A capacity limit will be stated for storage cabinets. For storage of containers outside of cabinets, see response to comment 41.</p>	9/28/90
47.	<p><u>Ecology Comment:</u> (Page 5-1, Section 5.0) Groundwater monitoring is not currently required at the 305-B facility. However, if a spill with potential for groundwater contamination occurs, groundwater monitoring will be required.</p> <p><u>Ecology Requirement:</u> Revise the text accordingly.</p> <p>DOE-RL/PNL Response No. 1: A second paragraph will be added noting when groundwater monitoring might be imposed in the future.</p> <p><u>Ecology Comment No. 3:</u> WDOE is not the correct abbreviation for Ecology and is inconsistent with the usage throughout the permit application. Compliance with any enforcement action by Ecology is mandatory. Furthermore, if there is a spill with potential for groundwater</p>	

305-B STORAGE UNIT
PART B APPLICATION NOD RESPONSE TABLE
(REVISION 0)

No.	Comment/Response	Ecology Concurrence
	contamination at the 305-B unit, then groundwater monitoring as stipulated under WAC 173-303-645 is required. Revise the permit application with specific plans for complying with the requirements of WAC 173-303-645 in the event of a spill.	
	DOE-RL/PNL Response No. 3: Terminology revisions have been made. Per our discussion in the Unit Managers' Meeting of June 4, 1991, text presented in this section will be identical to that provided in Rev. 1 of the 616 NRDWSF permit application.	
48.	<p><u>Ecology Comment:</u> (Page 6-1, Section 6.1) The plan states that doors are kept locked at all times, including when it is occupied. It seems reasonable that security and/or emergency response personnel would also have keys so that in the event of an emergency, building access would be facilitated for emergency response personnel.</p> <p><u>Ecology Requirement:</u> Clarify which non-facility staff has immediate access keys by their position (the names of individuals is not necessary).</p> <p>DOE-RL/PNL Response No. 1: This information will be added.</p>	9/28/90
49.	<p><u>Ecology Comment:</u> (Page 6-1, Section 6.1.1.1) Hanford Patrol performs periodic surveillance during non-working hours.</p> <p><u>Ecology Requirement:</u> Clarify what working hours are at the 305-B facility and detail the frequency of the Hanford Patrol surveillance. Discuss what the survey entails.</p> <p>DOE-RL/PNL Response No. 1: Working hours will be indicated. Specific frequency of Hanford Patrol surveillance will not be shown, but a general description of the Patrol's role in facility surveillance will be provided, i.e. "Hanford Patrol performs drive-by surveillance of 300 Area facilities on a 24-hour basis."</p>	9/28/90
50.	<p><u>Ecology Comment:</u> (Page 6-5, Section 6.1.1.1) There are some inconsistencies between the inspection form checklists presented in Figures 6-2 and 6-3 and the rest of the permit application. For example, it is not clear where the "unilab", open shelves and room storage are located; also, some areas depicted in facility diagrams are not listed on this form (for example, the RMW storage cell).</p> <p><u>Ecology Requirement:</u> Revise the checklists so that they are consistent with the text and in compliance with all applicable requirements. Explain what a "unilab" is. Note also that the minimum aisle space must be three feet to comply with Ecology requirements.</p>	

305-B STORAGE UNIT
PART B APPLICATION NOD RESPONSE TABLE
(REVISION 0)

No.	Comment/Response	Ecology Concurrence
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DOE-RL/PNL Response No. 1: The inspection forms will be revised for consistency of terminology and compliance with applicable requirements. The term "unilab" is an obsolete designation for the "flammable liquid bulking module" and the text will be edited for consistency. For aisle space considerations, see response to comment 57.

Ecology Comment No. 3: The following are some problems with the replacement checklists:

- The spaces provided for the inspector's name(s) and signature(s) are confusing. It should be clear where each name should be printed and where signed. The number of space(s) allotted for printed names and signatures should be equal.
- The storage locations are identified only by numbers; these should be identified by waste type.
- There is insufficient space for documenting the inspection.
- The points to be inspected are ambiguous, e.g., the amount of materials should be clearly stated.

Refer to the 616 Nonradioactive Dangerous Waste Storage Facility Part B Permit Application for guidance.

DOE-RL/PNL Response No. 3: The comments made above will be considered for inclusion in the revised checklist forms. See proposed revised text.

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| 51. | <p><u>Ecology Comment:</u> (Page 6-7, Section 6.2.1.2) The "loading bay" is mentioned.</p> <p><u>Ecology Requirement:</u> The "loading bay" is not depicted in the illustrations of the facility; state and illustrate where it is located. See comment 36.</p> <p>DOE-RL/PNL Response No. 1: This area is a section of the high bay storage area and will be covered in our responses to comments 15, 41, and 42.</p> | 9/28/90 |
| 52. | <p><u>Ecology Comment:</u> (Page 6-7, Section 6.2.1.2) The containment system is scheduled for weekly inspections yet this system may be subject to spills on a daily basis.</p> <p><u>Ecology Requirement:</u> The containment system must be inspected on a daily basis to be in compliance with the requirements of WAC 173-303-320(2)(c).</p> <p>DOE-RL/PNL Response No. 1: Inspection of the containment system for accumulation of spilled material will be added to the daily inspection regimen.</p> | 9/28/90 |

305-B STORAGE UNIT
PART B APPLICATION NOD RESPONSE TABLE
(REVISION 0)

No.	Comment/Response	Ecology Concurrence
53.	<p><u>Ecology Comment:</u> (Page 6-8, Section 6.2.2.1) The statement here that containers are inspected weekly conflicts with the daily container inspection detailed in the second paragraph of section 6.2.1.1 under <u>Daily Inspections</u>. Note that daily inspections are more appropriate for containers.</p> <p><u>Ecology Requirement:</u> Modify the text for daily container inspections so that it is consistent between these sections.</p> <p>DOE-RL/PNL Response No. 1: The text will be edited to provide for daily container inspection in section 6.2.2.1.</p>	9/28/90
54.	<p><u>Ecology Comment:</u> (Page 6-9, Section 6.3.1.1) The plan states, "The nearest emergency siren for 'area evacuation' and 'take cover' is located 300 yards southeast of 305-B ... and is audible in 305-B". It is not clear where in 305-B this siren can be heard.</p> <p><u>Ecology Requirement:</u> Detail in what parts of 305-B this siren can be heard. If it is not audible in all parts of the building (the RMW storage cell, for example), detail how any staff in parts of the building where this siren may be inaudible would be notified of the emergency.</p> <p>DOE-RL/PNL Response No. 1: The siren is audible in all parts of 305-B. The text will be revised to make this clear.</p>	9/28/90
55.	<p><u>Ecology Comment:</u> (Page 6-10, Table 6-1) <u>Typographical error:</u> "Excavation" must be evacuation.</p> <p>DOE-RL/PNL Response No. 1: The text will be revised.</p>	9/28/90
56.	<p><u>Ecology Comment:</u> (Page 6-10, Section 6.3.1) The floor spaces where the eyewash and emergency showers are located at the south end of the 305-B building are not adequately sloped.</p> <p><u>Ecology Requirement:</u> The floors in the areas under the eyewash and emergency shower must be configured to remove the excess water and prevent mixture with incompatible materials that may result from spills. See comment 15.</p> <p>DOE-RL/PNL Response No. 1: The floors under the emergency eyewash and shower facilities are part of the high bay storage area's secondary containment scheme. The adequacy of the secondary containment areas (slope, drainage collection structures) will be covered in our</p>	

305-B STORAGE UNIT
PART B APPLICATION NOD RESPONSE TABLE
(REVISION 0)

No.	Comment/Response	Ecology Concurrence
	responses to comment 41. Water reactive chemicals are stored in a cell with separate secondary containment structures except during vehicle loading and unloading. See also our response to comment 41.	
57.	<p><u>Ecology Comment:</u> (Page 6-13, Section 6.3.2) Minimum 1 and 2 foot aisle spaces are discussed. Ecology has a minimum 3 foot aisle space requirement.</p> <p><u>Ecology Requirement:</u> Modify the permit application and facility operations accordingly to comply with the 3 foot aisle space requirement.</p> <p>DOE-RL/PNL Response No. 1: Aisle spaces will be determined in accordance with Life Safety Code and Uniform Building Code requirements as has been previously agreed for the 616 Non-Radioactive Dangerous Waste Storage Facility. These revisions will be incorporated into the appropriate sections of the permit application and diagrams of container storage incorporating these aisle space requirements will be prepared and included in our responses to comments 41 and 42.</p>	9/28/90
58.	<p><u>Ecology Comment:</u> (Page 6-13, Section 6.4.1) The permit application states, "all waste unloading is performed inside the 305-B storage facility." This does not appear to be consistent with the actual operation of the facility. During a site visit (3/19/90), it was observed that storage of materials may occur outside of the 305-B building, suggesting that some unloading may occur there. Both loading docks are weathered asphalt and have no provisions for spill containment.</p> <p><u>Ecology Requirement:</u> The actual procedures for operating the facility must be presented within the permit application. Also provide descriptions of containment systems, including layout drawings with dimensions, sufficient to demonstrate capacity of containment. Describe the provisions under which external unloading occurs. Submit plans for modifications of interior and external accesses necessary to correct deficiencies for Ecology's approval prior to construction. See comment 15.</p> <p>DOE-RL/PNL Response No. 1: There is no external unloading or storage of dangerous waste at the 305-B facility; the item found outside was nonhazardous and thus outside the scope of this permit. The containment system for the loading areas of the high bay storage area will be further detailed in our response to comments 41 and 51.</p>	9/28/90

305-B STORAGE UNIT
PART B APPLICATION NOD RESPONSE TABLE
(REVISION 0)

No.	Comment/Response	Ecology Concurrence
59.	<p><u>Ecology Comment:</u> (Page 6-14, Section 6.4.2) The facility containment systems are discussed in relation to run-off. These containment systems are not adequately described or illustrated to support the assertion that there will be no run-off.</p> <p><u>Ecology Requirement:</u> Document that the secondary containment capacity is in compliance with WAC 173-303-630(7). See comment 15.</p> <p>DOE-RL/PNL Response No. 1: See response to comment 41.</p>	9/28/90
60.	<p><u>Ecology Comment:</u> (Page 6-14, Section 6.4.3) The facility containment systems are discussed in relation to water supplies. These containment systems are not adequately described or illustrated to support the assertion that there will be no contamination of water supplies.</p> <p><u>Ecology Requirement:</u> See comment 15.</p> <p>DOE-RL/PNL Response No. 1: See response to comment 41.</p>	9/28/90
61.	<p><u>Ecology Comment:</u> (Page 6-14, Section 6.4.4) The loss of power in the facility is discussed for "critical systems". There is no discussion of hazardous situations which could arise from loss of power (for example, buildup of flammable or toxic gases due to loss of ventilation).</p> <p><u>Ecology Requirement:</u> Describe operations and procedures for mitigating hazardous situations that may arise from an equipment or power failure. If these are described elsewhere in the permit application, a reference to the appropriate section may be sufficient. Refer to the 616 Nonradioactive Dangerous Waste Storage Facility Permit Application currently in development.</p> <p>DOE-RL/PNL Response No. 1: The loss of power scenario will be incorporated into the facility contingency plan and reference made from this section to it.</p>	9/28/90
62.	<p><u>Ecology Comment:</u> (Page 6-14, Section 6.4.5) The number of staff working in the facility at any one time has not been provided. There must be adequate protective items for the maximum number of employees present under WAC 173-303-806(4)(a)(viii)(E).</p> <p><u>Ecology Requirement:</u> Discuss how many staff members may be working in 305-B at any one time and how the available protective clothing is adequate.</p> <p>DOE-RL/PNL Response No. 1: A discussion of these subjects will be added to this section.</p>	9/28/90

9413137.1605

305-B STORAGE UNIT
PART B APPLICATION NOD RESPONSE TABLE
(REVISION 0)

No.	Comment/Response	Ecology Concurrence
63.	<p><u>Ecology Comment:</u> (Page 6-16, Section 6.5.1) Non-sparking tools are used to open ignitable waste containers but it is not stated that they will be used in areas where ignition of materials is a possibility.</p> <p><u>Ecology Requirement:</u> Add the use of non-sparking tools in flammable waste storage areas to the list of internal procedures (bullets, page 6-15) and modify the facility procedures if necessary.</p> <p>DOE-RL/PNL Response No. 1: The bullets will be modified and procedures changed to incorporate this comment.</p>	9/28/90
64.	<p><u>Ecology Comment:</u> (Page 6-16, Section 6.5.2) The permit application states that containers of ignitable waste are stored in flammable materials storage cabinets. It is not clear what the largest volume container for ignitable waste is.</p> <p><u>Ecology Requirement:</u> State what sizes and types of containers are stored in cabinets and shelves in the storage cells and which are stored in the high bay floor area. See comment 41.</p> <p>DOE-RL/PNL Response No. 1: See responses to comments 41, 42, and 46.</p>	9/28/90
65.	<p><u>Ecology Comment:</u> (Page 6-16, Section 6.5.2) It is not possible to evaluate compliance with WAC 173-303-630(8) for storage of ignitable or reactive waste with the information provided in the permit application.</p> <p><u>Ecology Requirement:</u> Clearly describe and illustrate the different locations and total waste volumes for different types of wastes and the types of containers in which they may be stored. See comments 41 and 42.</p> <p>DOE-RL/PNL Response No. 1: See responses to comments 41, 42 and 46.</p>	9/28/90
66.	<p><u>Ecology Comment:</u> (Page 7-1, Section 7.0) There is no discussion of the site-wide contingency plan for Hanford and how the 305-B contingency plan will be coordinated with the site-wide plan.</p> <p><u>Ecology Requirement:</u> Discuss the site-wide plan and explain how the 305-B contingency plan will be coordinated with the site-wide plan.</p> <p>DOE-RL/PNL Response No. 1: The facility contingency plan will be incorporated into the Building Emergency Plan for 305-B, providing automatic interface with the site-wide plan.</p>	

305-B STORAGE UNIT
PART B APPLICATION NOD RESPONSE TABLE
(REVISION 0)

No.	Comment/Response	Ecology Concurrence
	Pertinent details of the site-wide plan required under WAC 173-303-806(4)(a)(vii), such as MOUs with offsite agencies (see response to Comment 74) will be noted in this section. Further details on the site-wide plan will be made available through the sitewide Part B permit's contingency planning process.	
67.	<p><u>Ecology Comment:</u> (Page 7-1, Section 7.0) Under WAC 173-303-806(4)(a)(vii), the contingency plan must be the plan actually in use at the facility.</p> <p><u>Ecology Requirement:</u> Certify that this contingency plan is the one in use at the facility. State its document number and date of issue for reference.</p> <p>DOE-RL/PNL Response No. 1: See response to comment 66.</p>	9/28/90
68.	<p><u>Ecology Comment:</u> (Page 7-1, Section 7.0) The permit application states that this "plan <u>can</u> be amended ... whenever" a number of different situations arise, emphasis added. Note that under WAC 173-303-350(5), "The owner or operator <u>shall</u> ... immediately amend the contingency plan ..." in these cases, emphasis added.</p> <p><u>Ecology Requirement:</u> Edit the text accordingly.</p> <p>DOE-RL/PNL Response No. 1: The text will be modified to make this change.</p>	9/28/90
69.	<p><u>Ecology Comment:</u> (Page 7-1, Section 7.0) The application discusses changes to the Contingency Plan. Note that modifications to the permit are regulated under WAC 173-303-830. Two of the changes listed on lines 27 through 40 may be made as minor modifications under WAC 173-303-830(4); these are 1) change in emergency personnel, and 2) correction of typographical errors. The other changes listed are not minor modifications and as such are regulated under WAC 173-303-830(3) and must be made in compliance with WAC 173-303-840.</p> <p><u>Ecology Requirement:</u> Modify the text to reflect the above comment.</p> <p>DOE-RL/PNL Response No. 1: Modify the text to note the requirements of WAC 173-303-840 when certain changes are made to the facility contingency plan.</p>	9/28/90
70.	<p><u>Ecology Comment:</u> (Page 7-3, Section 7.4) There is no description of actions to be taken in the event that a dangerous waste shipment (which is damaged or otherwise presents a hazard to public health and the environment) arrives at the facility and is not acceptable, but cannot be transported pursuant to the requirements of WAC 173-303-370(5) (i.e., the container is damaged or shipping will present a hazard to public health or the environment). This</p>	9/28/90

305-B STORAGE UNIT
PART B APPLICATION NOD RESPONSE TABLE
(REVISION 0)

No.	Comment/Response	Ecology Concurrence
	<p>description must be provided in the contingency plan under the requirements of WAC 173-303-350(3)(b).</p> <p><u>Ecology Requirement:</u> Provide the procedure for handling containers in the condition described above.</p> <p>DOE-RL/PNL Response No. 1: This procedure will be added to the contingency plan.</p>	
71.	<p><u>Ecology Comment:</u> (Page 7-6, Section 7.4.4.4) In the event an evacuation is warranted, considerable time may elapse before the Building Emergency Director (BED) arrives at the scene and assesses dangers.</p> <p><u>Ecology Requirement:</u> Demonstrate personnel in the area will be adequately protected prior to the arrival of the BED. Describe measures that will be taken for protection while the BED or alternate is not present.</p> <p>DOE-RL/PNL Response No. 1: The contingency plan will be revised to show interim measures prior to arrival of the BED.</p>	
72.	<p><u>Ecology Comment:</u> (Page 7-13, Section 7.5.3) This section describes emergency equipment at the facility in general terms. Under WAC 173-303-350(3)(e), all emergency equipment at the facility must be listed.</p> <p><u>Ecology Requirement:</u> Provide this information in the form of a list which includes physical descriptions, amounts, capabilities, and locations.</p> <p>DOE-RL/PNL Response No. 1: This list will be prepared and added to the contingency plan.</p>	9/28/90
73.	<p><u>Ecology Comment:</u> (Page 7-13, Section 7.5.3) Supplies of absorbent pillows and other emergency spill response equipment are located in the high bay storage area adjacent to the main barrel storage area. These supplies could be included within a spill area and become difficult to safely access.</p> <p><u>Ecology Requirement:</u> Modify the storage arrangement for spill response supplies and other emergency equipment so that it would not be impacted in the event of a spill. Revise the permit application accordingly.</p> <p>DOE-RL/PNL Response No. 1: The placement of sorbent materials and drum repair kits within the secondary containment area is designed to facilitate emergency response in the event of a release incident. All personal protective equipment for response is located outside the high</p>	9/28/90

305-B STORAGE UNIT
PART B APPLICATION NOD RESPONSE TABLE
(REVISION 0)

No.	Comment/Response	Ecology Concurrence
	<p>bay so that anyone involved in emergency response will have opportunity to don the personal protective equipment prior to beginning response actions. The presence of the sorbent material in the storage area means that the material is easily accessed for spill response without need to make repeated trips between the contaminated and non-contaminated areas to transport the sorbent material. The text will remain unmodified.</p>	
74.	<p><u>Ecology Comment:</u> (Page 7-16, Section 7.6.3) Agreements with offsite medical facilities have not been mentioned.</p> <p><u>Ecology Requirement:</u> Describe any agreements or special arrangements with offsite medical facilities.</p> <p>DOE-RL/PNL Response No. 1: Memoranda of understanding (MOUs) are in effect with Kadlec Hospital in Richland, Our Lady of Lourdes Hospital in Pasco, and Kennewick General Hospital. These MOUs are contained in the sitewide contingency plan, and their existence will be noted in this section.</p>	9/28/90
75.	<p><u>Ecology Comment:</u> (Page 10-2, Section 10.4) The plan mentions sampling liquid accumulations in the containment systems to document that the substance is nondangerous. No elaboration of this sampling plan is given.</p> <p><u>Ecology Requirement:</u> The procedures for sampling, analyzing, and disposing of liquids and other materials accumulated in trenches or sumps must be described in greater detail. Also discuss verification of contaminant removal in the cases where the material was a dangerous waste.</p> <p>DOE-RL/PNL Response No. 1: The text will be revised to incorporate the spill cleanup procedures found in Section 4.1.1.8 and eliminate inference of a separate sampling plan for this type of incident.</p>	9/28/90
76.	<p><u>Ecology Comment:</u> (Page 10-2, Section 10.4) Office wastes generated at the facility are disposed of at the Hanford Site sanitary landfill.</p> <p><u>Ecology Requirement:</u> Although office wastes are not subject to the Dangerous Waste Regulations, they must be disposed of at a solid waste landfill which meets the minimal functional standards in chapter 173-304 WAC or other more stringent local standards. Document that wastes are disposed of in accordance with applicable laws and regulations and modify the text of the permit application accordingly.</p>	9/28/90

305-B STORAGE UNIT
PART B APPLICATION NOD RESPONSE TABLE
(REVISION 0)

No.	Comment/Response	Ecology Concurrence
	DOE-RL/PNL Response No. 1: The focus of this section is waste minimization, not disposal of office trash. The text will be revised to make this clear and eliminate references to disposal methods for nondangerous wastes, which are outside the scope of this permit application.	
77.	<p><u>Ecology Comment:</u> (Page 11-1, Section 11.0) The permit application states that this chapter is submitted in accordance with the requirements of WAC 173-303-610. The requirement for this chapter is actually in WAC 173-303-806(4)(a)(xiii).</p> <p><u>Ecology Requirement:</u> Edit the text accordingly.</p> <p>DOE-RL/PNL Response No. 1: The text will be revised.</p>	9/28/90
78.	<p><u>Ecology Comment:</u> (Page 11-1, Section 11.1) A closure schedule is required as part of the closure plan under WAC 173-303-610(3)(vii), but is not provided.</p> <p><u>Ecology Requirement:</u> Provide the schedule as required. Refer also to Figure 11-1 on page 11-10 of this permit application.</p> <p>DOE-RL/PNL Response No. 1: Section 11.1.6 will be expanded to include a "word description" closure schedule and reference Figure 11-1.</p>	9/28/90
79.	<p><u>Ecology Comment:</u> (Page 11-1, Section 11.1.1) The permit application states, "If there is any evidence of spills or leaks from the facility into the environment, samples will be taken and analyzed ..." It is not clear what type of "evidence" this is referring to. Note that there is past contamination, it is not always documented.</p> <p><u>Ecology Requirement:</u> In order to demonstrate that the site may be clean closed, the closure plan must show that undocumented spills or other sources of contamination have been taken into account. Therefore, the closure plan must allow for random sampling as well as "evidence of spills or leaks" to determine sampling locations.</p> <p>DOE-RL/PNL Response No. 1: A program for determining random sampling locations during closure will be created and included in the closure plan.</p>	9/28/90
80.	<p><u>Ecology Comment:</u> (Page 11-2, Section 11.1.1) Waste generated during closure will be "properly disposed of".</p> <p><u>Ecology Requirement:</u> State clearly what "properly disposed of" means.</p>	9/28/90

305-B STORAGE UNIT
PART B APPLICATION NOD RESPONSE TABLE
(REVISION 0)

No.	Comment/Response	Ecology Concurrence
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DOE-RL/PNL Response No. 1: The text will be edited to clarify how the fate of waste generated during closure will be determined. Details of the determination process for closure wastes will be addressed in the sitewide Part B permit document.

81. Ecology Comment: (Page 11-4, Section 11.1.4.2) The list of equipment and structures to be decontaminated is too restrictive. It must include all areas where waste has been handled (for example, the loading dock areas are not listed).
Ecology Requirement: Revise the list to include all areas which have the potential for becoming contaminated during the life of the facility operations.

DOE-RL/PNL Response No. 1: The list will be expanded.

82. Ecology Comment: (Page 11-4, Section 11.1.4.2.1) Use of radiation detection as the sole determination for contamination in the RMW storage areas is proposed. Baseline smears will have been documented prior to introduction of RMW.
Ecology Requirement: Sampling and testing for chemical contamination similarly to what is done in non-radiation areas will be required. Clarify why baseline radiation data will be presented; radiation contamination must be cleaned to background.

DOE-RL/PNL Response No. 1: This section will be revised to reference the sampling plan used in the other areas of the facility (Section 11.1.1) for use in this area as well, i.e. chemical indicators for indication of RMW contamination will be substituted for radioactive indicators. Appropriate procedures for working with RMW will be retained.

With regard to cleanup of radiation contamination, under Section 1004(27) of RCRA, source, special nuclear, and byproduct material, as defined in the Atomic Energy Act (AEA), is excluded from the definition of solid waste. In 10 CFR 962, the Department of Energy has declared that the chemical constituents of byproduct material will be subject to RCRA and that the radionuclides in the material will be subject to regulation under the AEA. Since Congress has specifically excluded source, special nuclear, and byproduct materials from the types of materials which can be regulated as solid wastes, a state may not exert regulatory authority over such materials as solid wastes.

Ecology Comment No. 2: USDOE/PNL will substitute chemical indicators for radioactive indicators for contamination in the RMW storage areas. In the original comment it was stated that sole use of radioactive indicators is not adequate and that verification sampling for

305-B STORAGE UNIT
PART B APPLICATION NOD RESPONSE TABLE
(REVISION 0)

No.	Comment/Response	Ecology Concurrence
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chemical contamination would also be required. Use of radiation detectors as real-time indicators of existing contamination seems an appropriate use of available technology during closure of the 305-B unit. The intent of verification sampling is to determine that chemical contamination (from the dangerous waste portion of the RMW) is no longer present -- something that radiation detection will not provide.

Ecology Requirement No. 2: Use available technology as appropriate. Do not let artificial regulatory distinctions prevent use of the best technology for a particular situation -- either or both chemical and radiological testing may be called for depending on the circumstances.

DOE-RL/PNL Response No. 2: Closure of the RMW storage areas will take place under radiation protection protocols, and radiological testing will probably be performed during the closure. However, due to historical use of the building as a radiation facility (and possible future use as same), it is inappropriate to rely on radiation samples for closure as a RCRA facility. As such, the closure plan will restrict itself to addressing the chemical testing requirements for RCRA facility closure.

83. Ecology Comment: (Page 11-5, Section 11.1.4.2.1) Verification sampling and analysis is not addressed in the decontamination procedures. 9/28/90

Ecology Requirement: Verification of decontamination is required in all cases where cleaning is performed, refer to Section 11.1.4.4.

DOE-RL/PNL Response No. 1: A reference to Section 11.1.4.4 will be included in this section.

84. Ecology Comment: (Page 11-7, Section 11.1.4.3) Grab samples of decontamination wastes will be collected using COLIWASA samplers. These samplers are only appropriate for homogenous materials. 9/28/90

Ecology Requirement: Discuss sampling methods for containers holding phase-separated materials.

DOE-RL/PNL Response No. 1: The COLIWASA was developed for EPA to ensure proper sampling of multiphasic materials in drums. The COLIWASA is specifically called for in WAC 173-303-110(2)(a)(vi) for sampling of containerized waste without qualification for phased materials. The text will remain unmodified.

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305-B STORAGE UNIT
PART B APPLICATION NOD RESPONSE TABLE
(REVISION 0)

No.	Comment/Response	Ecology Concurrence
85.	<p><u>Ecology Comment:</u> (Page 11-7, Section 11.1.4.3) Grab samples from decontamination waste drums will be sampled using a limited number of methods. In order to designate a material, the requirements of WAC 173-303-070 must be met.</p> <p><u>Ecology Requirement:</u> Revise the planned sampling and analysis to be in compliance with WAC 173-303-070.</p> <p>DOE-RL/PNL Response No. 1: The analytical plan presented in this section will be revised to reference WAC 173-303-070.</p>	9/28/90
86.	<p><u>Ecology Comment:</u> (Page 11-7, Section 11.1.4.3) Extraction procedure metals are discussed. Ecology will be requiring the use of TCLP in place of EP TOX.</p> <p><u>Ecology Requirement:</u> (shown as recommendation) Change the referral to TCLP instead of EP TOX. See comment 32.</p> <p>DOE-RL/PNL Response No. 1: The reference will be changed since the TCLP has already been adopted by EPA.</p>	9/28/90
87.	<p><u>Ecology Comment:</u> (Page 11-10, Figure 11-1) The schedule for closure does not seem to allow time for verification of decontamination.</p> <p><u>Ecology Requirement:</u> Revise the schedule to include verification sampling.</p> <p>DOE-RL/PNL Response No. 1: The schedule will be revised to include verification sampling required under Section 11.1.4.4.</p>	9/28/90
88.	<p><u>Ecology Comment:</u> (Page 11-13, Section 11.5) It is asserted that a closure cost estimate is not required because the 305-B storage facility is owned by the DOE. WAC 173-303-620(1)(c) exempts federal facilities from the requirements of closure cost estimates, however, under WAC 173-303-620(1)(c), "... operators of facilities who are under contract with the ... federal government must meet the requirements of this section". On page iii of this permit application it states, "Pacific Northwest Laboratory ... serves as co-operator of the 305-B storage facility ..." Specific requirements for financial assurance and liability coverage are under discussion at the Project Manager's level. Pending resolution of this issue, financial assurance and liability coverage is not required.</p> <p><u>Ecology Requirement:</u> Detailed closure cost estimates as required under WAC 173-303-620(3)(a) must be provided in the closure plan.</p>	

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305-B STORAGE UNIT
PART B APPLICATION NOD RESPONSE TABLE
(REVISION 0)

Ecology
Concurrence

No.	Comment/Response	
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DOE-RL/PNL Response No. 1: It is the view of DOE/PNL that the financial requirements of WAC 173-303-620 do not apply to PNL. Insofar as the legal operating status of the facility includes both DOE-RL and PNL (as co-operator), and does not expressly recognize PNL as the sole operator of any RCRA/dangerous waste facility, the government exemption applies. This view is consistent with 40 CFR 264.140(c), which exempts states and the federal government from the financial requirements of 40 CFR 264, Subpart H. The text will remain unmodified.

Ecology Comment No. 2: Closure cost estimates will not be provided.

Ecology Requirement No. 2: Closure cost estimates must be provided on an annual basis pursuant to WAC 173-303-620.

DOE-RL/PNL Response No. 2: This issue will be discussed further in the sitewide Part B permitting issues meetings. See response no. 1.

Ecology Comment No. 3: Closure cost estimates must be provided annually as agreed upon within the scope of the Hanford Sitewide Part B Permit.

DOE-RL/PNL Response No. 3: Closure cost estimates will be provided as specified in the DOE-RL/Ecology agreement.

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| 89. | <p><u>Ecology Comment:</u> (Page 12-2, Table 12-1) The retention times for a number of documents are not in compliance with the applicable regulations. For example, Table 12-1 states that annual reports will be kept for the life of the facility. Under WAC 173-303-210(2), annual reports must be kept for three years from the due date of each report, i.e., some of these reports must be kept past the end of the life of the facility.</p> <p><u>Ecology Requirement:</u> Revise this table so that all retention times are in compliance with the applicable regulations.</p> | 9/28/90 |
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DOE-RL/PNL Response No. 1: The table will be revised accordingly.

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| 90. | <p><u>Ecology Comment:</u> (Page 12-6, Section 12.4.1.1.1) "Manifest discrepancies" are discussed.</p> <p><u>Ecology Requirement:</u> Describe the criteria for a "manifest discrepancy".</p> | 9/28/90 |
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DOE-RL/PNL Response No. 1: The text has been modified to incorporate the text of WAC 173-303-370(4)(a) defining manifest discrepancies.

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305-B STORAGE UNIT
PART B APPLICATION NOD RESPONSE TABLE
(REVISION 0)

No.	Comment/Response	Ecology Concurrence
91.	<p><u>Ecology Comment:</u> (Page 12-6, Section 12.4.1.1.2) The receipt of unmanifested wastes may be less likely because the transporters also prepare the manifests, however, it still is possible for unmanifested waste to be delivered to the facility.</p> <p><u>Ecology Requirement:</u> Describe the procedure for receiving or refusing unmanifested waste.</p> <p>DOE-RL/PNL Response No. 1: A section describing these procedures has been added to Section 2.8. The language of section 12.4.1.1.2 has been revised to accommodate these procedures.</p>	9/28/90
92.	<p><u>Ecology Comment:</u> (Page 12-8, Section 12.4.1.5.1) Ecology is in the process of setting up a Nuclear and Mixed Waste office in Kennewick. There will be a contact person available for notification when this office is permanently staffed. Ecology will provide the appropriate information as soon as it is available.</p> <p><u>Ecology Requirement:</u> None noted</p> <p>DOE-RL/PNL Response No. 1: This information will be incorporated into the spill/release reporting procedure (Appendix 7A) when it is received.</p>	9/28/90
93.	<p><u>Ecology Comment:</u> (Page 12-9, Section 12.4.1.6.1) Reportable spill quantities are discussed. Under the provisions of WAC 173-303-145, all spills and discharges to the environment must be reported immediately.</p> <p><u>Ecology Requirement:</u> Delete text relating to reportable quantities for spills and discharges and revise spill reporting procedures accordingly.</p> <p>DOE-RL/PNL Response No. 1: The text has been modified to incorporate the spill reporting provisions shown in WAC 173-303-145, i.e. that any spill which threatens public health or the environment, unless permitted, will be reported regardless of quantity.</p> <p><u>Ecology Comment No. 2:</u> Spill reporting requirements and procedures will be revised.</p> <p><u>Ecology Requirement No. 2:</u> Ecology has determined that spills of dangerous waste greater than one pint in volume or one pound in weight must be reported to Ecology immediately unless the spill occurs inside a totally enclosed permanent structure with adequate air emissions controls. Reports should be made to Ecology's Kennewick office, (509) 546-2977. Refer to the Hanford Facility Part B Permit in development for additional guidance.</p>	

305-B STORAGE UNIT
PART B APPLICATION NOD RESPONSE TABLE
(REVISION 0)

No.	Comment/Response	Ecology Concurrence
	<p>DOE-RL/PNL Response No. 2: The text has been revised to incorporate the reporting criteria of WAC 173-303-145(2) for hazardous materials, and the above criteria for releases of dangerous waste to the environment.</p>	
94.	<p><u>Ecology Comment:</u> (Page 13-1, Section 13.0) Only federal laws are discussed. Several state laws are also applicable and must be identified pursuant to WAC 173-303-806(4)(a)(xix). <u>Ecology Requirement:</u> Discuss applicable state air, water, and other environmental laws such as the State Environmental Policy Act and WAC 173-304 Minimum Functional Standards for Solid Waste Handling.</p> <p>DOE-RL/PNL Response No. 1: An expanded list of applicable laws consistent with that submitted for other Hanford Site Part B permit applications, including the Clean Air Act, Clean Water Act, National Environmental Policy Act, and State Environmental Policy Act, will be added to Chapter 13.</p> <p><u>***Note: The following NOD was first noted in the NOD of September 28, 1990.***</u></p>	9/28/90
95.	<p><u>Ecology Comment:</u> (Page vii, Acronyms and Abbreviations) The lists of acronyms and abbreviations is not comprehensive. For example, it is not clear from these lists what is meant by "facility". <u>Ecology Requirement:</u> This section must be sufficiently comprehensive to prevent ambiguities in the terms used within the permit application. This section should be expanded to include a list of definitions where, at a minimum, terms such as "facility", "generator", "Hanford Site", "off-site", "on-site", and "unit" are clearly defined. Refer to WAC 173-303-040, Definitions.</p> <p>DOE-RL/PNL Response No. 1: Definitions of these terms have been added to Section 1.</p>	