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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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April 16, 1993

Mr. James D. Bauer, Acting Program Manager
Office of Environmental Assurance,
Permits, and Policy
U.S. Department of Energy
P.O. Box 550, A5-15
Richland, WA 99352-0550

Dear Mr. Bauer:

Re: 222S Lab NOD, Supplemental Items

Here is the official submittal of the NOD Responses that we discussed at our last unit
Unit Manager's meeting on March 23, 1993. In addition, I have added the additional
review comments on Appendices 3A and 3B of the Part B permit application.

If you have any questions about this letter, please call me at (206) 438-7558.

Sincerely,

Gary Anderson, P.E.
Nuclear and Mixed Waste Management

GA:lj

Enclosures

- cc: Becky Austin, WHC
- Dan Duncan, EPA
- Robert Hiegel, DOE
- Rick Oldham, WHC
- Doug Sherwood, EPA
- Joel Williams, Jr., WHC



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<u>No.</u>	<u>Comment/Response</u>	<u>Ecology Concurrence</u>
1.	<p><u>Page 1-5, Section 1.4, Line 41. Comment:</u> The acceptable definition of "facility", as used in this application, should be compatible with the definition in the draft site-wide permit.</p> <p><u>Requirement:</u> Delete the present definition of Hanford Facility. Add the following: "The term facility means the contiguous land, structures, appurtenances and improvements on the land used for recycling, reusing, reclaiming, transferring storing, treating, or disposing of dangerous waste. The boundary of this Facility is the legal and physical description of all the land in Benton, Franklin, and Grant Counties included herein." Include the boundary description for all the land in the Hanford Reservation.</p> <p>DOE-RL/WHC Response: Text will be revised to read: "Hanford Facility--A single RCRA Facility identified by the EPA/State Identification Number WA7890008976 that consists of over 60 TSD units conducting dangerous waste management activities. These TSD units are included in the Hanford Facility Dangerous Waste Part A Permit Application (DOE-RL 1988b). The Hanford Facility consists of the contiguous portion of the Hanford Site that contains these TSD units and, for the purposes of RCRA, is owned and operated by the U.S. Department of Energy (excluding lands north and east of the Columbia River, river islands, lands owned or used by the Bonneville Power Administration, lands leased to the Washington Public Power Supply System, and lands owned by or leased to the state of Washington). The Hanford Facility is a single facility for purposes of provisions regulating 'offsite' or 'onsite' waste handling."</p> <p>ECOLOGY Response: The DOE-RL/WHC Response is acceptable until such time as a superseding definition is established in the site-wide permit.</p>	
2.	<p><u>Page 2-5, Section 2.1.3.3, Line 43. Comment:</u> Although the nitric acid tanks are not regulated, the contents become waste if they leak or are spilled.</p> <p><u>Requirement:</u> Please discuss containment of any spilled nitric acid at either the outside or inside tank.</p>	

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	<p>DOE-RL/WHC Response: The nitric acid tanks are considered to store product and are not required to be regulated under the dangerous waste regulations. Spilled nitric acid will be handles in accordance with WAC 173-303-145.</p> <p>ECOLOGY Response: Ecology concurs with the DOE-WHC/RL response.</p>	
3.	<p><u>Page 2-6, Section 2.1.3.3, Line 20:</u> <u>Comment:</u> Suppose the waste in the 207-SL Retention Basin is found to be hazardous, what is its disposition?</p> <p><u>Requirement:</u> Show what happens when hazardous waste is found in the 207-SL Retention Basin.</p> <p>DOE-RL/WHC Response: Text will be added to include a general discussion of what happens if dangerous waste is detected in the 207-SL Basins.</p> <p>ECOLOGY Response: Ecology concurs with the DOE-WHC/RL response.</p>	
	<p><u>Page 3-10:</u> <u>Comment:</u> Incompatible wastes are not discussed on this page or in this Section.</p> <p><u>Requirement:</u> Discuss incompatible wastes in this Section.</p> <p>DOE-RL/WHC Response: Incompatible wastes are discussed in Section 4.1.4 (containers) and Section 4.2.8 (tanks).</p> <p>ECOLOGY Response: Ecology concurs with the DOE-WHC/RL response.</p>	
	<p><u>Page 4-25, Section 4.2.5, Line 41:</u> <u>Comment:</u> This sentence does not go far enough. The requirements of WAC 173-303-640 do apply to the 219-S Waste Handling Facility. the requirements of WAC 173-303-640(11) are related to wastes F020, F021, F022, F023, F026, and F027.</p>	

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	<p><u>Requirement:</u> Rewrite this sentence to conform to the regulations.</p> <p>DOE-RL/WHC Response: Text will be revised to specifically reference WAC 173-303-640(11).</p> <p>ECOLOGY Response: Ecology concurs with the DOE-WHC/RL response.</p>	
6.	<p><u>Page 6-3, Section 6.2.1:</u> <u>Comment:</u> This Section does not mention the specific requirement of WAC 173-303-395 (d) to have the Facility inspected by a fire prevention professional or fire marshal annually.</p> <p><u>Requirement:</u> Change the inspection plan to include fire inspection by professional experts.</p> <p>DOE-RL/WHC Response: Text will be added to Section 6.2 for annual inspection of areas that store ignitable or reactive waste by a professional person familiar with the Uniform Fire Code.</p> <p>ECOLOGY Response: Ecology concurs with the DOE-WHC/RL response.</p>	
7.	<p><u>Page 6.4, Section 6.2.1:</u> <u>Comment:</u> This sub-section does not list all the items to be inspected under the requirements of WAC 173-303-640.</p> <p><u>Requirement:</u> Please include a tabulation of all check lists including items checked, type of check (visual, aural, etc.), frequency of inspection, result expected, etc., as an example. The tabulation in the Permit application for the 242-A evaporator is a model for all permit applications.</p> <p>DOE-RL/WHC Response: Text will be modified to add inspection schedule checklists for the 219-S Waste Handling Facility and 222-S Dangerous and Mixed Waste Storage Area.</p>	

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	<p>ECOLOGY Response: Ecology concurs with the DOE-WHC/RL response.</p>	
8.	<p><u>Page 11-1, Section 11.0, Line 40:</u> <u>Comment:</u> Action levels for all contaminants of concern are background only, not risk based. State only wastes must be cleaned up to designation levels.</p> <p><u>Requirement:</u> Delete all reference to risk based standards unless used in the context of applying the nuclear and mixed waste programs soil cleanup policy.</p> <p>DOE-RL/WHC Response: Text will be modified to include proposed changes to WAC 173-303 on healthbased levels for contaminants. State-only waste will be cleaned up to designation levels.</p> <p>ECOLOGY Response: Ecology concurs with the DOE-WHC/RL response.</p>	
9.	<p><u>Page 11-3, Section 11.1.1, Line 33:</u> <u>Comment:</u> Portland cement concrete always cracks. Either this slab is randomly cracked or it has fabricated joints. These cracks or joints have the capacity to convey hazardous spills to the ground under the slab.</p> <p><u>Requirement:</u> If there is any record or stain that shows a spill, sampling for hazardous substances must be done.</p> <p>DOE-RL/WHC Response: Text will be modified to include a statement that spill sampling will be done if operating records show any spill(s) of dangerous waste. On page 11-6, Section 11.1.1.2.2, lines 33 through 42, a discussion is provided on visual signs of spillage (stains) and what course of action is to be taken.</p> <p>ECOLOGY Response: Ecology concurs with the DOE-WHC/RL response.</p>	
10.	<p><u>Page 11-4, Section 11.1.1.2, Line 22:</u> <u>Comment:</u> SW-846 (EPA-1986) is an obsolete document.</p>	

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Requirement: Please quote the latest edition or State SW-846, latest edition, or some equivalent citation.

DOE-RL/WHC Response: The SW-846 (EPA 1986) is the correct reference document to use. The November 1990 Final Update I package has not been promulgated by the EPA. The EPA methods hotline has indicated that SW-846, 1986 document, is still an active document.

ECOLOG Y Response: The Department of Energy requested that the Environmental Protection Agency, Region 10, establish the version of SW-846 applicable to the Hanford Reservation. On August 3, 1992, in a letter to June M Hennig, the EPA replied that the November 1990 was the correct version. Original comment stands.

11. Page 11-6, Section 11.1.1.2.2, Line 44: **Comment:** Wipe samples indicate presence or absence of hazardous substances. Background is defined as a volumetric concentration.

Requirement: How will one be compared to the other?

DOE-RL/WHC Response: The text will be modified to delete the reference to "background levels". Wipe samples will be analyzed using SW-846 ANALYTICAL METHODS.

ECOLOG Y Response: Ecology concurs with the DOE-WHC/RL response.

12. Page 11-12, Section 11.1.4.4.2, Line 8: **Comment:** The citation of the "most recent version of SW-846 (EPA-1986)" is incorrect since the latest edition of any reference cannot be dated as the previous edition.

Requirement: Delete the parenthetical "(EPA-1986)."

ECOLOG Y Response: Ecology concurs with the DOE-WHC/RL response.

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13.	<p><u>Page 12-2, Section 12.3, Line 40:</u> <u>comment:</u> On-site transporter requirements described here are not the same as those described in the proposed site-wide permit.</p> <p><u>Requirement:</u> On-site transporter requirements should be the same as those in the proposed site-wide permit.</p> <p>DOE-RL/WHC Response: There is no regulatory basis for this condition. This condition has been inappropriately written to impose requirements for onsite waste movement. The regulation in WAC 173-303-180 is applicable to generators who offer waste for transport off the site of generation. The WAC 173-303-370 is applicable to dangerous waste facilities that receive waste from <u>offsite</u>. There are no shipping paper requirements for <u>onsite</u> movements. Tracking mechanisms have been in place for the onsite movement of waste at the Hanford Facility for many years; this documentation is used to ensure that waste destined for further onsite or offsite management units is properly managed. Waste handling at the Hanford Facility is consistent with that which is protective of human health and the environment.</p> <p>ECOLOGY Response: Although the tracking mechanisms in place have recently resulted in the misplacement of 2,000 barrels of waste at the site, the DOE-WHC/RL response is acceptable until superseded by the Site Wide Permit.</p>	
14.	<p><u>Page 14-1, Section 14.0, Line 33:</u> <u>Comment:</u> The Washington Department of Ecology does not recognize the status "Co-operator", here or any other place in the application.</p> <p><u>Requirement:</u> Substitute the word "Operator" or "Permitee" for the word "Co-operator" where used in this context.</p> <p>DOE-RL/WHC Response: (Hanford Facility Permit comment II.H) Ecology's position misinterprets both the law and the relationship between the DOE-RL and its contractors. The DOE-RL is responsible for overall management and operation of the Hanford Facility, including policy, programmatic funding, scheduling decisions, and general oversight of the contractors' performance. The contractors are responsible for certain day-to-day activities</p>	

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such as waste analysis, waste handling, monitoring, container labeling, personnel training, and recordkeeping.

In Ecology's Dangerous Waste Regulations, "operator" is defined as the person responsible for the overall operation of a facility (WAC 173-303-040). The WHC is not responsible for the overall operation of either the Hanford Facility or any individual TSD unit within the Hanford Facility. The parties to the FFACO have agreed therein that the DOE owns and operates the Hanford Facility. The contractors' roles are more limited as specified under their contracts with the DOE-RL and should not be identified as responsible for all activities.

ECOLOGY Response: DOE-WHC/RL response is acceptable until such time as a superceding definition is established in the site wide permit.

15.

Appendices 3A and 3B: This office has accepted the Hanford Site Liquid Effluent Characterization Program, Quality Assurance Program Plan, WHC-SD WM-QAPP-011, Rev. 2, as the standard procedure for sampling and analysis for characterization at the Hanford Facility.

Requirement: Please be certain that all pcedures shown in these Appendices conform to this document. It is understood that this procedure may have to be modified by the conditions imposed by certain sites.

DOE-RL/WHC Response: The Hanford Site Liquid Effluent Characterization Program, Quality Assurance Program Plan was written specifically for the sampling of 33 streams identified in the plan. This plan is not a standard procedure for sampling and analysis on the Hanford Facility and not applicable to the 222-S Laboratory complex. The waste analysis plans for the 219-S Waste Handling Facility and the 222-S Dangerous and Mixed Waste Storage Area are based on the requirements in WAC 173-303-300, WAC 173-303-400, and 40 CFR 265.

ECOLOGY Response: Since the Hanford Site Liquid Effluent Characterization Program, Quality Assurance Program Pla, WHC-FD WM-QAPP-001, Rev. 2 is in strict accordance with

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EPA Procedures, and has been carefully negotiated between all parties to the Tri-Party Agreement, the writer assumed that it would be adapted for general use for reasons of efficiency and speed of approval. If the permittee wishes to go through the same negotiating process again, the Department of Ecology will do so. Both appendices 3A and 3B will be reviewed by our chemists and referred to the EPA for their review. further action deferred pending review.

16. Appendix 3A, Page 2, Section 3.1: Comment: The disposition of the lab packs is not mentioned here.

Requirement: State the disposition of the lab packs.

DOE-RL/WHC Response: A discussion of the disposition of labpacks is not required in this appendix. The Waste Analysis Plan for the Dangerous and Mixed Waste Storage Area (Appendix 3B) contains this discussion; also Sections 3.1.2.2 and 3.1.2.3 of Chapter 3.0

ECOLOGY Response: Ecology concurs with the DOE-WHC/RL response.

17. Appendix 3A, Page 11, Sections 4.4 and 5: Comment: Is the "chain of possession" in Section 4.4. the same as the "chain of custody" in Section 5.?

Requirement: Either explains the difference or make the wording uniform.

DOE-RL/WHC Response: Text will be modified to state 'chain-of-custody'.

ECOLOGY Response: Ecology concurs with the DOE-WHC/RL response.

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18.	<p><u>Appendix 3B, Page 14, Section 3.6:</u> <u>Comment:</u> The data for entry into the sampling logbook does not include the matrix of the sample (i.e. soil, water, oil and etc.).</p> <p><u>Requirement:</u> Please include the sample matrix in the data entered into the logbook.</p> <p>DOE-RL/WHC Response: Text will be modified to required identification of the sample matrix in the sampling logbook.</p> <p>ECOLOGY Response: Ecology concurs with the DOE-WHC/RL response.</p>	
19.	<p><u>Appendix 3B, Page 17, Section 3.8, Line 9:</u> <u>Comment:</u> This Section says that off-site waste is not accepted at the 222-S Dangerous and Mixed Waste Storage Area. Page 1, Section 3.0., line 37, says that off-site samples are accepted.</p> <p><u>Requirement:</u> Explain the apparent inconsistency.</p> <p>DOE-RL/WHC Response: The Hanford Site is assigned a single Waste Generator number. Samples taken on the Hanford Site are sent to offsite laboratories for analysis; unused sample portions are sent back to the Hanford Site (222-S Laboratory Complex) under the guidelines in WAC 173-303-071 (1) (i) (a). Section 3.1.2.6 discusses the acceptance of returned sample portions.</p> <p>ECOLOGY Response: Ecology concurs with the DOE-WHC/RL response.</p>	
20.	<p><u>Appendix 3B, Page 20, Table 3.4., Footnote, and Other Places:</u> <u>Comment:</u> The 1986 edition of SW -846 is quoted.</p>	

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Requirement: Please use the latest version of SW-846.

DOE-RL/WHC Response: Refer to disposition on comment number 10.

ECOLOGY Response: See comment number 10.

21. Appendix 4A: Comment: Some of the included drawings are illegible.

Requirement: Please furnish legible drawings.

DOE-RL/WHC Response: Legible drawings will be provided.

ECOLOGY Response: Ecology concurs with the DOE-WHC/RL response.

22. Appendices 4A, 4B, 4C, 4D: Comment: These Appendices are not certified by a registered professional engineer. This certification is required by WAC 173-303-806(4)(a)(i).

Requirement: Have these items certified by a registered professional engineer.

DOE-RL/WHC Response: Previous discussions with Ecology have shown that Ecology's interpretation of the language in WAC 173-303-806(4)(a) is that a registered professional engineer's certification is necessary only for those technical data that specifically are identified in WAC 173-303 as requiring such. There is no WAC 173-303 requirement specifically requiring certification of the design drawings in questions. The Doe-RL therefore contends that the interpretation implied in the NOD comment is inconsistent with Ecology's application of this requirement at other facilities.

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	<p>ECOLOGY Response: Your point is well taken. In addition, Appendix 4C was certified by a professional engineer. Ecology concurs with the DOE-WHC/RL response.</p>	
23.	<p><u>Appendices 3A and 3B:</u> <u>Comment:</u> These Appendices do not mention the document Hanford Site Liquid Effluent Characterization Program Quality Assurance Program Plan, WHC-SD-WM-QAPP-011. This document is currently being negotiated between Ecology, the Environmental Protection Agency, and the Department of Energy. When agreed upon, Ecology will regard it as the standard authority for sampling and analysis of liquid samples from all sources at the Hanford Reservation.</p> <p><u>Requirement:</u> The Hanford Site Liquid Effluent Characterization Program Quality Assurance Program Plan should be the primary reference and source for Appendices 3A and 3B.</p> <p>DOE-RL/WHC Response: Refer to disposition on comment number 15.</p> <p>ECOLOGY Response: See Comment No. 15.</p>	
24.	<p><u>Appendix 7A, Page 13 of 83:</u> <u>Comment:</u> Drawing H-2-5170 is not included in the application, and if it were, it would not be the appropriate place to show the 218-W-7 Dry Waste Burial Ground.</p> <p><u>Requirement:</u> Show this Facility on Dwg. H-13-000006.</p> <p>DOE-RL/WHC Response: Drawing H-13-000006 will be modified to show location of the 218-W-7 Dry Waste Burial Ground (taken out of service in 1976 and is now a CERCLA site).</p> <p>ECOLOGY Response: Ecology concurs with DOE-WHC/RL response.</p>	

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25.	<p><u>Appendix 7A, Page 16 of 83:</u> <u>Comment:</u> This building plan does not show exterior doors, creating the impressions the staff will evacuate through the walls.</p> <p><u>Requirement:</u> The doors in the 222- S Laboratories will be shown with standard architectural symbols.</p> <p>DOE-RL/WHC Response: Figure 1-9 of Appendix 7A will be modified to show egress points.</p> <p>ECOLOGY Response: Ecology concurs with the DOE-WHC/RL response.</p>	
26.	<p><u>Appendix 7A, Page 20 of 83, Section 3.0., First Bullet:</u> <u>Comment:</u> This paragraph directly contradicts the photograph on Page 14 of 14, Part A.</p> <p><u>Requirement:</u> Implement the policy stated and avoid a visit from regulatory inspectors.</p> <p>DOE-RL/WHC Response: The contradiction stated has been looked into and a determination made that the main body of their permit application and the building emergency plan need to be clarified as to the types and sizes of various approved U.S. Department of Transportation containers are used. Text will be updated to state that various sizes of approved U.S. Department of Transportation containers are used and stored at the 222-S Complex.</p> <p>ECOLOGY Response: Ecology concurs with the DOE-WHC/RL response.</p>	
27.	<p><u>Appendix 7A, Page 19 of 83;</u> <u>Comment:</u> The Secondary Staging Area shown on this sketch, is directly downwind of the prevailing wind direction at this Facility.</p> <p><u>Requirement:</u> Move the Secondary Staging Area to a spot opposite the least prevailing wind direction.</p>	

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<p>DOE-RL/WHC Response: The formally designated staging areas are established as the best assembly locations under most anticipated emergency situations. The staging areas are not so fixed as to prohibit deviation. In the event of an actual emergency, the building emergency director will direct evacuation and assembly as the situation warrants.</p>	<p>ECOLOGY Response: Ecology concurs with the DOE-WHC/RL response.</p>	
28.	<p><u>Appendix 3A, Section 3.5.4.</u> Are we to understand from this section that although arsenic, barium, cadmium, chromium, selenium and silver are discharged in "regulated concentrations", they do <u>not</u> show up in sample results?</p> <p><u>Requirement:</u> Please explain.</p>	
29.	<p><u>Appendix 3A, Section 4.4, 3rd paragraph.</u> This section mentions a laboratory procedure, but does not define it.</p> <p><u>Requirement:</u> Please submit the "laboratory approved procedures" for our review. Guidelines are not sufficiently specific.</p>	
30.	<p><u>Appendix 3A, Section 4.4, 3rd paragraph, 2nd bullet.</u> The distinction between the "sample identification code" and the "sample code" are not clear.</p> <p><u>Requirement:</u> Please explain.</p>	

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31.	<p><u>Appendix 3A, Section 4.4, Third paragraph, 3rd bullet, and Section 5.0, 3rd paragraph.</u> Approval of solid waste handling procedures and laboratory procedures are the prerogative of the United States Environmental Protection Agency and the Washington Department of Ecology. The Contractor's approval is insufficient.</p> <p><u>Requirement:</u> The conditions of approval should require approval by the regulatory agencies.</p>	
32.	<p><u>Appendix 3B, Section 3.5, 2nd paragraph.</u> Test methods are not found in Table 3.2.</p> <p><u>Requirement:</u> Please State Environmental Protection Agency Approved Test Methods in Table 3.2.</p>	

23. Appendix 3A, Section 3.5.4. Are we to understand from this section that although arsenic, barium, cadmium, chromium, selenium and silver are discharged in "regulated concentrations", they do not show up in sample results?

Requirement: Please explain.

24. Appendix 3A, Section 4.4, 3rd paragraph. This section mentions a laboratory procedure, but does not define it.

Requirement: Please submit the "laboratory approved procedures" for our review. Guidelines are not sufficiently specific.

25. Appendix 3A, Section 4.4, 3rd paragraph, 2nd bullet. The distinction between the "sample identification code" and the "sample code" are not clear.

Requirement: Please explain.

26. Appendix 3A, Section 4.4, Third paragraph, 3rd bullet, and Section 5.0, 3rd paragraph. Approval of solid waste handling procedures and laboratory procedures are the prerogative of the United States Environmental Protection Agency and the Washington Department of Ecology. The Contractor's approval is insufficient.

Requirement: The conditions of approval should require approval by the regulatory agencies.

27. Appendix 3B, Section 3.5, 2nd paragraph. Test methods are not found in Table 3.2.

Requirement: Please State Environmental Protection Agency Approved Test Methods in Table 3.2.

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Author: G. Anderson, Ecology Addressee: J. D. Bauer, RL Correspondence No.: Incoming 9303478

Subject: 222S LAB NOD, SUPPLMENTAL ITEMS

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		C. K. DiSibio	B3-15	
		J. F. Francik	T6-12	X
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		G. J. Warwick	T6-12	X
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		EDMC	H6-08	X
		JFW File/LB	H6-24	X
		RCRA File/GHL	H6-23	X

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