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Department of Energy

Richland Field Office

P.O. Box 550

Richland, Washington 99352

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93-RPS-266

JUL 16 1993

Mr. George C. Hofer
Hanford Project Manager
U.S. Environmental Protection Agency
Region 10
1200 Sixth Avenue
Seattle, Washington 98101

Ms. Dru Butler, Program Manager
Nuclear and Mixed Waste Program
State of Washington
Department of Ecology
P.O. Box 47600
Olympia, Washington 98504-7600

Dear Mr. Hofer and Ms. Butler:

RESPONSE TO THE HANFORD FACILITY DANGEROUS WASTE PERMIT APPLICATION, HANFORD CENTRAL WASTE COMPLEX-RADIOACTIVE MIXED WASTE STORAGE FACILITY, REVISION 0, NOTICE OF DEFICIENCY (TS-2-4)

Enclosed is a notice of deficiency (NOD) response table for the Hanford Facility Dangerous Waste Permit Application, Hanford Central Waste Complex-Radioactive Mixed Waste (HCWC-RMW) Storage Facility. The HCWC-RMW Storage Facility Dangerous Waste Permit Application, Revision 0 was submitted to the State of Washington Department of Ecology (Ecology) and the U.S. Environmental Protection Agency (EPA) for review on October 31, 1991, in accordance with the Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) Milestone M-20-05. This permit application is currently in the second NOD review cycle. Of the original 170 comments, 44 remain unresolved. The response table has been prepared to address the 44 unresolved review comments transmitted in a letter from Ms. E. A. Wiley, Ecology, to Mr. C. E. Clark, the U.S. Department of Energy, Richland Operations Office (RL), dated March 12, 1993. 28361



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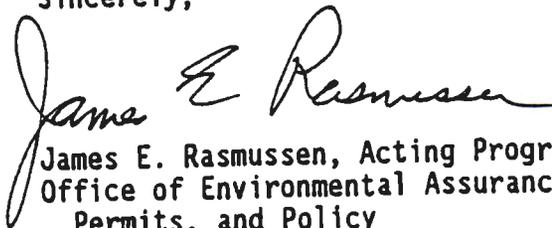
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Should you have any questions, please contact Mr. C. E. Clark of RL on (509) 376-9333 or Mr. R. C. Bowman of the Westinghouse Hanford Company on (509) 376-4876.

Sincerely,



James E. Rasmussen, Acting Program Manager
Office of Environmental Assurance,
Permits, and Policy
DOE Richland Operations Office

EAP:CEC



R. E. Lerch, Deputy Director
Restoration and Remediation
Westinghouse Hanford Company

Enclosure:
NOD Response Table

cc: R. C. Bowman, WHC, w/encl.
R. E. Lerch, WHC, w/o encl.
S. M. Price, WHC, w/o encl.
Administrative Records, H6-08, w/encl.

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1.	<p><u>Page 1-1, line 35.</u> <u>Comment:</u> This line states that waste from the Radioactive Mixed Waste Storage Facility (RMW) will be processed at the Waste Receiving and Processing Facility (WRAP) beginning in 1996.</p> <p><u>Requirement:</u> Add a qualifier to this sentence stating that <u>if</u> the WRAP facility is ready in 1996, it will begin receiving waste from the Radioactive Mixed Waste Storage Facility (RMW). This more accurately reflects the uncertain time schedules associated with any large project.</p> <p><u>DOE-RL/WHC Response:</u> Text will be revised to read: "When the WRAP Facility Module 1 becomes operational (anticipated 1996)..."</p>	03/12/93
2.	<p><u>Page 1-1, line 43.</u> <u>Comment:</u> Are wooden pallets still being used at the RMW? During the joint inspection by EPA and the Department it was observed that several of the pallets had broken under the pressure of the banding being used. In some cases this had placed the load in a potentially unstable position. The proposed solution to this problem by DOE/WHC was to increase the strength of the pallets, either by using a heavier grade of wooden pallet or by using a synthetic pallet.</p> <p><u>Requirement:</u> Please state how the pallet breakage problem has been resolved, and provide the details on the type and strength of pallet being used at the RMW. Also, it is appropriate to speak in this same reply to the type of banding material being used at the RMW.</p> <p><u>DOE-RL/WHC Response:</u> Wooden pallets still are being used at the RMW Storage Facility. New pallets have been ordered with a stronger reinforced frame. In addition, slats on new pallets afford greater strength. Pallets are constructed from #1 pallet board and each pallet can hold a minimum weight of 4,000 pounds (1,818 kilograms). Wooden pallets have been purchased in the following dimensions: 48 inches by 48 inches (122 centimeters by 122 centimeters), 56 inches by 56 inches (142 centimeters by 142 centimeters), and 62 inches by 62 inches (158 centimeters by 158 centimeters). Depending on the ordered size, pallet constructions consist of three to four 2 by 4 stringers with eight to nine 1 by 6 top and bottom boards using two 0.5-inch screw nails with three nails per joint.</p>	03/12/93

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	<p>Strapping material used to band containers to pallets have ranged from 0.5-inch (1.3-centimeters) synthetic material to 1-inch (2.54-centimeters) heavy duty metal strapping. Currently, the RMW Storage Facility is using 0.5-inch by 0.02-inch (1.3-centimeters by 0.05-centimeters) heavy duty metal strapping.</p> <p>The 183-H Solar Evaporation Basin waste (which came out of trench 24) had been stored outside on the Mixed Waste Storage Pad since 1986. New pallets have been ordered and these containers will be repalleted.</p> <p>The pallet breakage observed is confined to the leading edge of the outside topboard due to the pressure applied by the banding material from the bulging containers. This breakage is not considered to present any adverse effects to the integrity of the pallet.</p>	
3.	<p><u>Page 1-2, line 8.</u> <u>Comment:</u> This line states that storage of radioactive waste is not within the scope of this permit application. Since mixed waste is defined as being radioactive, this statement must be intended to speak to radioactive waste that does not also designate as dangerous waste.</p> <p><u>Requirement:</u> Clarify that mixed waste is addressed by this application, but that radioactive only waste is not, unless it results in a waste compatibility problem.</p> <p><u>DOE-RL/WHC Response:</u> (Hanford Facility Permit comment III.I.B.a.) These additions clarify that Ecology's jurisdiction is over the hazardous components of mixed waste, not the radioactive components, in accordance with RCRA Section 6905(a), 10 CFR Part 962, and the EPA's Notice Regarding State Authorization to Regulate the Hazardous Components of Radioactive Mixed Wastes under RCRA, 51 Fed. Reg. 24,504 (July 3, 1986); also refer to RCW 70.105.109 (Ecology might regulate mixed wastes "to the extent it is not preempted by federal law").</p>	

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The AEA vests the DOE with the responsibility to assure the development, utilization and control of atomic energy for military and for all other purposes vital to the common defense and security [42 U.S.C. § 2012(a)]. The AEA also provides that The processing and utilization of source, byproduct, and special nuclear material must be regulated in the national interest and in order to provide for the common defense and security and to protect the health and safety of the public [42 U.S.C. 2012(d)]. In accordance with the AEA, the DOE and its predecessor agencies have developed a comprehensive program for the regulation of source, special nuclear, and byproduct materials in both product and waste forms.

In 1976, Congress enacted the RCRA, a comprehensive cradle-to-grave management scheme, administered by the EPA and authorized states, for the generation, treatment, disposal, and recycling of hazardous waste. The scope of the RCRA program is delineated by the definitions of "solid waste" and "hazardous waste". The RCRA 1004(5) defines the term "hazardous waste" as a subset within the universe of "solid wastes", which are defined in Section 1004(27).

The definition of "solid waste" in RCRA expressly excludes "source, special nuclear, or byproduct materials" as defined by the AEA. Those excluded materials are regulated under the AEA either by the DOE or the Nuclear Regulatory Commission. Because the materials are not solid wastes, the materials cannot be hazardous wastes because all hazardous wastes must first meet the definition of a solid waste.

In 1987, the DOE, after consultation with the EPA and other interested parties, issued a Final Interpretive Rule (10 CFR Part 962) regarding the definition of "byproduct material" set forth in Section 11(e)(1) of the AEA (May 1, 1987, 52 FR 15937) for purposes of RCRA applicability. Under the rule, the AEA term "byproduct material" means:

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any radioactive material yielded in or made radioactive by exposure to the radiation incident to the process of producing or utilizing special nuclear material.

The Final Rule clarifies the DOE's obligation under RCRA as applied to "radioactive mixed waste" i.e., those radioactive waste substances that are also "hazardous" within the meaning of RCRA. The Final Rule states that "the words 'any radioactive material' as used in the term 'byproduct', refer only to the actual radionuclides dispersed or suspended in the waste substance. The nonradioactive hazardous component of the waste will be subject to regulation under the Resource Conservation and Recovery Act." The principle effect of the Final Rule is that handlers of radioactive mixed wastes, such as the DOE, are subject to dual regulations; the handler must comply with both the requirements of the AEA for the radioactive component and RCRA regulations for the management of the nonradioactive hazardous waste component.

The Preamble to the DOE's May 1, 1987 byproduct rule recognizes that the DOE is the federal agency responsible for authoritatively construing the requirements of the AEA, as that Act applies to DOE facilities.

... it seems apparent that RCRA was intended to have some applicability to materials that were already regulated under the AEA. Section 1006(a) of RCRA, ..., specifies that as to 'any activity or substance' subject to the AEA, RCRA regulation must yield, but only to the extent of inconsistent requirements of the AEA. The archetypal substances that can fairly be described as "subject to" the AEA are substances containing source, special nuclear and byproduct material, to which the AEA expressly is directed. (52 FR at Col. 1, page 15940).

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The preamble explains the effect of language of RCRA and AEA as follows:

Read together, DOE believes that the definitional exclusion and the language of section 1006(a) are correctly understood to provide for the regulation under RCRA of all hazardous waste, including waste that is also radioactive. RCRA does not apply to the radioactive component of such a waste however, if it is source special nuclear or byproduct material. Instead, the AEA applies to that radioactive component. Finally, if the application of both regulatory schemes proves conflicting in specific instances, RCRA yields to the AEA (emphasis added) (Id. at Col. 2, para 1).

In addition the preamble states:

While DOE does not anticipate that adoption of today's final rule will lead to frequent cases of 'inconsistency', section 1006(a) provides critical assurance that the implementation of the final rule will create no impediment to the maintenance of protection of radiological hazards as well as DOE's accomplishment of its other statutory responsibilities under the AEA (emphasis added) (Id. at Col. 2, Para 2).

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The DOE's byproduct rule therefore appropriately recognizes the dual AEA/RCRA regulation of mixed waste while preserving the exclusion of the source, special nuclear, and byproduct component of the waste from regulation under RCRA, and also recognizes the supremacy of AEA authority in the event of a conflict. This approach has been most recently confirmed by the EPA's Clarification Notice of September 23, 1988, entitled Clarification of Interim Status Qualification Requirements for the Hazardous Components of Radioactive Mixed Waste (53 Fed. Reg. 37,045). In the September 23, 1988 Notice, the EPA committed to a strategy of minimizing the impact of RCRA regulations by developing an approach for joint regulation of radioactive mixed waste "that will affect program implementation in the least burdensome manner practicable." In terms of the inconsistency issue, the EPA recognized that "implementation of the dual regulatory program for radioactive mixed waste management might result in instances where compliance with both sets of regulations is not only infeasible but undesirable." In cases where there was an actual inconsistency, the EPA acknowledged that the AEA would take precedence, and the inconsistent RCRA requirement would be inapplicable.

The FFACO likewise contemplates that the DOE, not Ecology, will have authority over radioactive waste pursuant to the AEA. The FFACO at Article V defines mixed waste as follows:

Radioactive Mixed Waste" or "Mixed Waste" are wastes that contains both hazardous waste subject to RCRA, as amended, and radioactive waste subject to the Atomic Energy Act of 1954, as amended.

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Under Article I, Jurisdiction, the parties agreed that the state of Washington would regulate the generation, treatment, storage and disposal of hazardous waste pursuant to the state HWMA and regulations governing the management of hazardous wastes (WAC 173-303). As explained above, RCRA excludes source, special nuclear, and byproduct materials from its definition of solid (and therefore hazardous) wastes. Article I further states that "nothing in this Agreement shall be construed to require DOE to take any action pursuant to RCRA which is inconsistent with the requirements of the Atomic Energy Act of 1954, as amended." FFACO, Art. I, ¶ 5. The DOE's authority to regulate radioactive materials was therefore clearly preserved in the FFACO. The FFACO provides for CERCLA removal actions at certain operable units. Radioactive materials fall within CERCLA's definition of hazardous substance. This does not, however, bestow any authority on Ecology to regulate radioactive materials as a hazardous waste under the RCRA permit.

Therefore, any assertion by Ecology that the source, special nuclear, or byproduct component of a mixed waste is subject to regulation under RCRA or Ecology's Dangerous Waste Regulations is inconsistent with and preempted by federal law as well as being inconsistent with the FFACO. It would also be outside the scope of activities which can be subject to regulation at a federal facility pursuant to Section 6001 of RCRA (42 U.S.C. 6961).

Text will be revised to read: "Because dangerous waste does not include the source, special nuclear, and by-product material components of mixed waste, radionuclides are not within the scope of WAC 173-303 or of this permit application. The information on radionuclides is provided only for general knowledge where appropriate."

Ecology Comment: This issue is still being reviewed by Ecology and will be submitted under separate cover.

DOE-RL/WHC Response 2: Disposition of this comment is dependant upon resolution of this Hanford Facility issue.

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4.	<p><u>Page 1-3, line 13.</u> <u>Comment:</u> This line states that radionuclides are not within the scope of this permit application, but the information is included for general knowledge.</p> <p><u>Requirement:</u> This sentence must be deleted.</p> <p><u>DOE-RL/WHC Response:</u> Refer to disposition number 3.</p> <p><u>Ecology Comment:</u> Refer to comment number 3.</p> <p><u>DOE-RL/WHC Response 2:</u> Refer to DOE-RL/WHC Response 2 for comment number 3.</p>	
5.	<p><u>Page 1-5, line 24.</u> <u>Comment:</u> This section describes the types of contractors employed by the DOE at the Hanford Facility, but does not provide the names of the current contractors.</p> <p><u>Requirement:</u> The names of the current contractors employed for the various activities listed must be identified in this section. Ecology suggests adding to the end of each bulleted item the following example listing: "currently Westinghouse Hanford Company". This should be done for each appropriate contractor, e.g., WHC, PNL, KEH, and HEHF.</p> <p><u>DOE-RL/WHC Response:</u> Text will remain unmodified. Contractors might change. Therefore, this will eliminate the need to revise the permit if contractors are changed.</p>	03/12/93
6.	<p><u>Page 1-5, line 40.</u> <u>Comment:</u> The first sentence in this definition goes beyond the needs of this permit application. It is only necessary to indicate in this section how the term is used in the permit application, not to discriminate between the radioactive and dangerous components of the waste streams. The definition of dangerous waste is clearly defined in WAC 173-303-040, and it is not appropriate to alter or add to it in a permit application.</p> <p><u>Requirement:</u> Delete the first sentence in this definition.</p> <p><u>DOE-RL/WHC Response:</u> Refer to disposition number 3. Text will be revised. A new sentence will appear after radioactive on Page 1-5, Line 43. "Dangerous waste does not include the source, special nuclear, or by-product material components of mixed waste".</p>	03/12/93

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7.	<p><u>Page 1-6, line 12. Comment:</u> This definition of the hanford Facility is in conflict with the definition of the Hanford Facility contained in the Draft hanford Facility Dangerous Waste Permit. Also, see the following comment/requirement.</p> <p><u>Requirement:</u> This definition must be changed to match the definition contained in the Draft Hanford Facility Dangerous Waste Permit, or deleted from this section.</p> <p>*DOE-RL/WHC Response: Please note that the Hanford Facility definition has been revised since submittal of the NOD response table on October 9, 1992. The revised Hanford Facility definition is as follows:</p> <p>Hanford Facility--A single Resource Conservation and Recovery Act (RCRA) facility identified by the U.S. Environmental Protection Agency (EPA)/state of Washington Department of Ecology (State) Identification Number WA7890008967 that consists of over 60 treatment, storage, and disposal (TSD) units conducting dangerous waste management activities. These TSD units are included in the <i>Hanford Facility Dangerous Waste Part A Permit Application</i> (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 by the U.S. Government and operated by the U.S. Department of Energy, Richland Operations Office (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).</p>	03/12/93*

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8.	<p><u>Page 1-6, line 31.</u> <u>Comment:</u> On-site shipments are those shipments originating and terminating within the Hanford Facility as defined in the Draft hanford Facility Dangerous Waste Permit.</p> <p><u>Requirement:</u> Revise this definition to comply with the above statement, and the revised definition of the hanford Facility, contained in the previous comment.</p> <p>DOE-RL/WHC Response: Refer to disposition number 7.</p> <p><u>Ecology Comment:</u> From the way this definition is written (page 1-6, line 31), it can be implied that waste from an off-site DOE facility may be considered onsite if it is run by RL. Waste which is going to WIPP might fall under this category. The above definition does not designate the difference between off-site and on-site in regards to transportation of waste. The definition of on-site as is provided in the Hanford Facility draft Site-Wide permit must be used.</p> <p>DOE-RL/WHC Response 2: There is currently no Hanford Facility Permit to follow. Currently, DOE-RL is considering the need to pursue acquiring separate EPA/State identification numbers for generating and/or TSD activities that are conducted on land that is not contiguous with the Hanford Facility. Disposition of this comment is dependant upon resolution of this Hanford Facility issue.</p>	
9.	<p><u>Page 1-7, line 1.</u> <u>Comment:</u> This section states that notifications regarding class I modifications to the permit for RMW will be submitted once yearly, and incorporated into the permit following review.</p> <p><u>Requirement:</u> Ecology is currently developing the procedures for class I modifications to the permit. It is currently expected that notifications of class I modifications will be submitted four (4) times yearly (once each quarter). This section of the permit application will comply with the requirements for class I modifications as determined by the facility-wide permit. Ecology will provide this information as soon as it becomes available.</p> <p>DOE-RL/WHC Response: Text could be modified in the future if and when Ecology provides direction.</p>	
	<p><u>Ecology Comment:</u> Ecology will provide direction regarding class I modifications as soon as more information becomes available.</p>	

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	DOE-RL/WHC Response 2: No response required at this time.	
10.	<p><u>Page 2-1, line 32.</u> <u>Comment:</u> This sentence states that radioactive waste is not within the scope of this permit.</p> <p><u>Requirement:</u> See comment number 3.</p> <p>DOE-RL/WHC Response: Refer to disposition number 3.</p> <p><u>Ecology Comment:</u> Refer to comment 3.</p> <p>DOE-RL/WHC Response 2: Refer to DOE-RL/WHC Response 2 for comment number 3.</p>	
11.	<p><u>Page 2-2, line 38.</u> <u>Comment:</u> The language in this section pertaining to the facility boundaries, status of owner/operators, and exclusion of BPA, WPPSS, etc. is not consistent with the language in the Draft Hanford Facility Dangerous Waste Permit (Hanford Permit).</p> <p><u>Requirement:</u> This section must be revised to comply with the conditions of the Draft Hanford Permit. Specifically, the boundaries of the facility, and the status of the owner/operators must be changed to reflect the conditions of the Draft Hanford Permit.</p> <p>DOE-RL/WHC Response: Refer to disposition number 7.</p>	03/12/93
12.	<p><u>Page 2-3, line 28.</u> <u>Comment:</u> This sentence begins with the words "Heads of field documents can determine...". It is not clear what is meant by "Heads of field documents".</p> <p><u>Requirement:</u> This sentence should be rewritten to clearly state who or what can determine whether other alpha contaminated wastes must be handled as transuranic waste.</p> <p>DOE-RL/WHC Response: Per U.S. Department of Energy Order 5820.2A, Definition Number 39, the text will be revised to "...Heads of Field Elements..."</p>	03/12/93

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13.	<p><u>Page 2-4, line 9.</u> <u>Comment:</u> Is the ultimate fate of all low-level mixed waste burial at the Hanford Facility?</p> <p><u>Requirement:</u> Please provide more detail regarding the fate of low-level mixed wastes. In particular, include a discussion of the treatment options, Land Disposal Restrictions that are applicable to this waste stream, transportation, and the burial options for the waste.</p> <p><u>DOE-RL/WHC Response:</u> This level of detail is beyond the scope of the HCWC-RMW Storage Facility Dangerous Waste Permit Application. Text will remain unmodified.</p>	03/12/93
14.	<p><u>Page 2-4, line 43.</u> <u>Comment:</u> This section has been provided to EPA's Toxic Substance Control Act compliance section for review.</p> <p><u>Requirement:</u> Any comments on the compliance issues surrounding the storage of PCB's at this unit will be included in future NOD's. Are there state-only PCB wastes stored at this unit? State-only PCB wastes are those wastes which contain greater than one (1) part per million (ppm) PCBs and less than 50 ppm PCBs.</p> <p><u>DOE-RL/WHC Response:</u> There are state-only PCB's stored at the RMW Storage Facility. This waste contains between <u>greater than one part per million</u> and less than 50 parts per million (1 part per million > x > 50 parts per million).</p>	03/12/93
15.	<p><u>Page 2-4, line 46.</u> <u>Comment:</u> The section in parentheses of this sentence says that chapter 13, section 13.8, is the section dealing with PCB storage. However, section 13.8 deals with the Wild and Scenic Rivers Act of 1969. Section 13.7 addresses PCB storage under the Toxic Substance Control Act of 1976.</p> <p><u>Requirement:</u> Change the reference in the sentence to the appropriate section of chapter 13.</p> <p><u>DOE-RL/WHC Response:</u> Text will be revised.</p>	03/12/93

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16.	<p>The National Fire Protection Association (NFPA) has set standards for the separation of lockers storing flammable liquids, and for the designation of the area where these lockers are located.</p> <p><u>Requirement:</u> Include in the text the separation of the Low-flash-point modules, and the boundaries of the area designated for the siting of these modules within the RMW. Also add to the figures in this chapter a diagram, similar to figure 2-3, that shows the separations of the modules, the area boundary designated for flammable liquids storage, and the location of adjacent structures and access routes.</p> <p>DOE-RL/WHC Response: The text will be revised to include the separation of the Low-Flash-Point Mixed Waste Storage Modules. A graphic will be added to Chapter 2.0 delineating the separation of the Low-Flash-Point Mixed Waste Storage Modules, the area boundary, etc. The minimum spacing for the Low-Flash-Point Mixed Waste Storage Modules is based on a formula extracted from the National Fire Protection Association (NFPA) 80A. For the Low-Flash-Point Mixed Waste Storage Modules with 24-foot (7.3 meters) widths, the minimum side to side separation is 33.4 feet (10.2 meters); the minimum end to end separation is 22 feet (6.7 meters).</p>	03/12/93
17.	<p><u>Page 2-5, line 35.</u> <u>Comment:</u> The approximate weight of the Low-Flash-Point Mixed Waste Storage Modules is shown as 22,000 pounds each. However, the specifications provided by the manufacturers in appendices 4A-6, 4A-9, and 4A-10 show a weight of 8,800 to 9,700 pounds for each module.</p> <p><u>Requirement:</u> Please explain this significant difference in the text and the appendices in regard to the weight of the storage modules.</p> <p>DOE-RL/WHC Response: The indicated weights of 8,800 pounds (4,000 kilograms) to 9,700 pounds (4,409 kilograms) represents the shipping weight of different modules. Each Low-Flash-Point Mixed Waste Storage Module has a designed storage 'weight' capacity of approximately 20,000 pounds (9,091 kilograms).</p>	03/12/93

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18.	<p><u>Page 2-6, line 28.</u> <u>Comment:</u> There is no mention made in this section whether or not the mixed waste storage pad has a protective coating to prevent spills from permeating the concrete.</p> <p><u>Requirement:</u> Add to the text in this section a description of the protective coating added to the concrete pad to prevent contaminants from entering the concrete.</p> <p>DOE-RL/WHC Response: The text will be revised to include "...the Mixed Waste Storage Pad is provided with an impervious epoxy sealant to prevent contaminants from entering the concrete. Information on the epoxy sealant is located in Appendix 4A-8."</p>	03/12/93
19.	<p><u>Page 2-9, line 1.</u> <u>Comment:</u> It is important that Ecology remain involved in the development of the new additions to the RMW. By working with DOE/WHC, Ecology can point out potential compliance problems with the new units, and thus save time and effort by preventing or mitigating retrofitting of the new construction. Ecology appreciates the recent DOE/WHC efforts to keep communication open regarding design and construction activities at the RMW, and encourages the continuation of this exchange. Once the permit for this unit is issued, as an addition to the Draft Hanford Permit, new additions to the RMW may require a modification of the permit.</p> <p>DOE-RL/WHC Response: No response required.</p>	03/12/93
20.	<p><u>Page 2-9, line 41.</u> <u>Comment:</u> The legal description is missing from Appendix 2A.</p> <p><u>Requirement:</u> The legal description should be included in both a textual description and a map. Legal boundaries of the TSD unit site must be included on the topographic map pursuant to WAC 173-303-806(4)(a)(xviii)(G). Surface waters must also be included pursuant to WAC 173-303-806(4)(a)(xviii)(C).</p> <p>DOE-RL/WHC Response: A legal description will be provided when available.</p> <p><u>Ecology Comment:</u> A legal description will be provided when available.</p> <p>DOE-RL/WHC Response 2: Accept.</p>	

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21.	<p><u>Page 2-10, line 1.</u> <u>Comment:</u> This short paragraph does not adequately meet the requirements of WAC 173-303-806(4)(a)(xi).</p> <p><u>Requirement:</u> This section must either be expanded to fulfill the requirements of WAC 173-303-(4)(a)(xi), or add the <u>Hanford Plant Standards, Standard Design Criteria-4.1</u>, as an appendix for review by Ecology. This is required to assess compliance with the above WAC citation.</p> <p>DOE-RL/WHC Response: This text is verbatim from the 616 NRDSWF Dangerous Waste Permit Application, which has been accepted by Ecology.</p>	03/12/93
22.	<p><u>Page 2-12, line 8.</u> <u>Comment:</u> The figure referenced by this paragraph describing the roads (figure 2-14) does not address the specific traffic patterns around the RMW, rather it addresses the traffic flows around the 200 West area.</p> <p><u>Requirement:</u> This section must be expanded to include more specific information on the traffic flows in and around the RMW. Also, the design load bearing capacity of the roads around the RMW are not listed, as required by WAC 173-303-806(4)(a)(x). These capacities must also be added to this section.</p> <p>DOE-RL/WHC Response: Text will be modified to reference Section 2.4.1 for load bearing capacities and Appendix 2A for current traffic patterns.</p>	03/12/93
23.	<p><u>Page 2-13, line 13.</u> <u>Comment:</u> No sampling of the water to be released is proposed. It is possible that an undetected release to the pad will contaminate the stormwater. How will this possibility be dealt with? Sampling and analyses for pH and radioactive contamination would be quick and simple field tests. If the pad was known to be clean, and no waste was stored on the pad during accumulation of precipitation, no testing would be required. How is the known or suspected contaminated waste water to be collected?</p> <p><u>Requirement:</u> This section should provide for some type of field screening of the waste prior to release to the french drain. The removal of known contaminated waste must also be addressed in this section.</p>	

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	<p>DOE-RL/WHC Response: Refer to disposition number 3 regarding radioactive contamination. This text is verbatim from the 616 NRDWSF Dangerous Waste Permit Application, which has been accepted by Ecology.</p> <p><u>Ecology Comment:</u> The 616 permit does indeed require sampling of water prior to release to the environment. Since this is a storage area for dangerous and mixed waste, some type of field screening must provided prior to release to the French drain.</p> <p>DOE-RL/WHC Response 2: Clarification - the Mixed Waste Storage Pad only stores radioactive and/or mixed waste, not dangerous waste (nonradioactive).</p> <p>Text will be revised to indicate that if contamination is suspected, an analysis of pH and radioactive contamination will be performed.</p>	
24.	<p><u>Page 2-14, line 23. Comment:</u> Are there drainage ditches, trenches, or the like, where water pools or is intentionally collected? To where do the gutters on the buildings release?</p> <p><u>Requirement:</u> Please answer the above questions in section 2.5.3. Provide any additional site and/or design drawings with the reply.</p> <p>DOE-RL/WHC Response: Water is pooled intentionally on the Mixed Waste Storage Pad and the Waste Receiving and Staging Area to permit cleanliness verification before release to the environment (Refer to disposition number 23).</p> <p>Run-off (e.g., rain, snowmelt, etc.,) from the RMW Storage Facility buildings and uncovered ground is directed away from the structures and down slope and is absorbed by the soil or evaporates rapidly.</p> <p>Refer to Appendix 4A for construction specifications and design drawings.</p>	

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	<p>Ecology Comment: Does "cleanliness verification" mean that the pooled water is sampled to detect contamination? Describe the verification process.</p> <p>DOE-RL/WHC Response 2: Water is pooled intentionally only on the Mixed Waste Storage Pad to permit cleanliness verification before release to the environment. If contamination is suspected, an analysis of pH and radioactive contamination will be performed.</p>	
25.	<p><u>Page 2-16, line 7.</u> Comment: The last line in this section should be deleted. WAC 173-303-283(3)(h) is applicable to the RMW. RMW is required to comply with WAC 173-303-283 in full, however, the nature of RMW as a storage facility generally constitutes compliance with WAC 173-303-283(3)(h).</p> <p>Requirement. Delete the last line of this section.</p> <p>DOE-RL/WHC Response: This text is verbatim from the 616 NRDWSF Dangerous Waste Permit Application, which has been accepted by Ecology.</p>	03/12/93
26.	<p><u>Page 2-17, line 28.</u> Comment: Releases to secondary containment in excess of 10 gallons, or which require implementation of the contingency plan, must be immediately reported to Ecology. Releases to secondary containment under 10 gallons must be immediately recorded in the operating record, pursuant to WAC 173-303-145(2)(d).</p> <p>Requirement. This information and the means to comply with it must be added to section 2.7.</p> <p>DOE-RL/WHC Response: This text is nearly verbatim from the 616 NRDWSF Dangerous Waste Permit Application, which has been accepted by Ecology. This information is located in Chapter 4.0, Section 4.1.1.8.</p>	

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	<p>Ecology Comment: Information on spills and discharges will comply with the requirements of WAC 173-303-145. This must be indicated in the section on spills and discharges.</p> <p>DOE-RL/WHC Response 2: Permit conditions concerning releases of dangerous waste should be drawn from the language at WAC 173-303-810(14)(f), which exists specifically for inclusion in permits (see other dangerous waste permit issued in the State of Washington). DOE-RL/WHC will comply with the requirements of WAC 173-303-145 pursuant to the Dangerous Waste Regulations and does not believe that abstraction from -145 for use in their permit is necessary to compel compliance. Please note that WSR 92-15-036 (effective thirty-one days after filing on July 7, 1992) amended WAC 173-303-145, eliminating 173-303-145(2)(c) and (d) entirely (removing the language specifying quantity thresholds and requirements for releases to secondary containment). The language in WAC 173-303-145 now states that "this section shall apply when any dangerous waste or hazardous substance is intentionally or accidentally spilled or discharged into the environment (unless otherwise permitted) such that human health or the environment is threatened, regardless of the quantity of dangerous waste or hazardous substance." The -145 language adds nothing to the general permit condition requirement found at WAC 173-303-810(14)(f) which requires that a permittee report any noncompliance which may endanger health or the environment. Section -810(14)(f) also provides for reporting of details on releases and dispositioning of material.</p>	
27.	<p><u>Page 2-18, line 1.</u> Comment: In their comments on the Draft Hanford Permit, DOE/WHC stated that it was restrictive and unnecessary to define which group within the WHC would be required to provide the reports to Ecology. They suggested that references to the Occurrence Notification Center be removed from the permit. Ecology has concurred, and has removed the reference from the latest draft of the permit.</p> <p>Requirement. It is required that the owner/operator report immediately, but the particular group doing the reporting was originally submitted by DOE/WHC, and Ecology included it to make it clear where the responsibility lies for this action. WHC and DOE must decide whether they are going to include this information in their permit applications or not.</p> <p>DOE-RL/WHC Response: Text will be revised. This information will be removed from future permit application submittals.</p>	03/12/93

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28.	<p><u>Page 2-18, line 40.</u> <u>Comment:</u> Transporters must also report pursuant to WAC 173-303-145. The stated requirement is drawn from WAC 173-303-270.</p> <p><u>Requirement.</u> Add to this section a statement that transporters will also comply with WAC 173-303-145.</p> <p>DOE-RL/WHC Response: The Hanford Facility has no jurisdiction over the transporters of offsite dangerous waste shipments.</p>	03/12/93
29.	<p><u>Page 2-19, line 1.</u> <u>Comment:</u> The specific locations of the information fulfilling the elements of this section must be noted. To date, Ecology has found that the DOE/RL and WHC emergency plans are deficient in the area of spill mitigation following a release.</p> <p><u>Requirement.</u> Cite the specific locations of the information necessary to complete these sections (i.e., it is not sufficient to reference to Chapter 7.0). The specific sections of the documents referenced by chapter 7.0 must be cited in each appropriate section.</p> <p>DOE-RL/WHC Response: The Building Emergency Plan for the Central Waste Complex is updated at least annually. To reference sections could require unnecessary modification(s) to the permit. Refer to Table of Contents in the Building Emergency Plan for the Central Waste Complex for location of information.</p>	

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	<p>Ecology Comment: Ecology requires that the specific section for the mitigation and control of spills be noted. Editorial changes are not permit modifications.</p>	
	<p>DOE-RL/WHC Response 2: There is no WAC 173-303 regulation(s) requiring that specific sections of supporting documents such as those located in an appendix (e.g., Building Emergency Plan for the Central Waste Complex) be identified in the text portion (Chapters 1.0 - 15.0) of a Part B permit application. The reader is referenced to Chapter 7.0 which references the reader to Appendix 7A. The reader can look at the Table of Contents in the Building Emergency Plan for the Central Waste Complex to locate the specific sections addressing mitigation and control of spills. Also, editorial changes are considered a permit modification. According to WAC 173-303-830 Appendix I, administrative and informational changes (of which this type of change would be) would be considered a Class I modification. The procedure DOE-RL is proposing would eliminate unnecessary permit modifications and eliminate unnecessary text because this information is already available in the Table of Contents for the Building Emergency Plan for the Central Waste Complex.</p>	
30.	<p><u>Page 2-19, line 21.</u> Comment: It is Ecology's decision whether WAC 173-303-145(3)(a)(iii) applies to the RMW or not.</p> <p>Requirement. Delete the last line of this paragraph.</p>	03/12/93
	<p>DOE-RL/WHC Response: This text is verbatim from the 616 NRDFS Dangerous Waste Permit Application, which has been accepted by Ecology.</p>	
31.	<p><u>Page 2-19, line 25.</u> Comment: The on-site manifest system must follow the system established by the Draft Hanford Permit, On-Site Transportation, permit condition II.Q. Refer to the latest edition of the Draft Hanford Permit for guidance.</p>	
	<p>Requirement. After review, include the requirements for the on-site manifest system in this section of the permit.</p>	

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<p>DOE-RL/WHC Response: (Hanford Facility Permit comment II.Q) 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. Furthermore, onsite transfers of dangerous waste meet all substantive requirements of 49 CFR Parts 100-177; these regulations are applicable only to offsite transport. Waste handling at the Hanford Facility is consistent with that which is protective of human health and the environment.</p> <p><u>Ecology Comment:</u> Ecology will regulate all tracking mechanisms at the site. Ecology will concur only if the established tracking mechanisms are similar to those which are stated in Hanford Site Wide Draft Permit condition II.Q.</p> <p>DOE-RL/WHC Response 2: There is currently no Hanford Facility Permit to follow. Disposition of this comment is dependant upon resolution of this Hanford Facility issue.</p>	03/12/93	
<p>32. <u>Page 2-20, line 26.</u> <u>Comment:</u> WAC 173-303- and 40 CFR 264 are the sections that define the manifest requirements for Hanford. Ecology has not reviewed the acceptance criteria used by WHC, so we are unable to either confirm or deny that WAC 173-303 manifest requirements are met by this document.</p>	03/12/93	
<p><u>Requirement.</u> A statement must be added to this section indicating that the manifest requirements of WAC 173-303 are complied with, as well as how they are implemented.</p>		
<p>DOE-RL/WHC Response: Text will be revised to provide additional detail on offsite waste shipment manifesting.</p>		

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33.	<p><u>Page 2-21, line 48.</u> <u>Comment:</u> There are no provisions for waivers of the manifesting requirements of WAC 173-303.</p> <p><u>Requirement.</u> This paragraph must be reworded to be more specific concerning the intent of the waivering process, or alternatively, deleted. However, it is not possible to "waive" the manifest requirements. Off-site waste must be accompanied by a manifest as described in Chapter 173-303 WAC, and on-site waste must be accompanied by a manifest as described in the Draft Hanford Permit.</p> <p><u>DOE-RL/WHC Response:</u> This paragraph is addressing the shipment of onsite transfers, which are accompanied by waste tracking forms, not an EPA manifest. Refer to disposition number 31.</p> <p><u>Ecology Comment:</u> It is not clear from the paragraph written regarding waivers, that this exemption is provided only for onsite transfers of waste. Be more specific so that the paragraph on waivers will not be misconstrued.</p> <p><u>DOE-RL/WHC Response 2:</u> Text will be modified to indicate that the waiver provisions are only applicable to onsite waste shipments.</p>	
34.	<p><u>Page 2-23, line 24.</u> <u>Comment:</u> Noncompliant shipments that cannot be transported must be addressed in the contingency plan (WAC 173-303-350(3)(b) and WAC 173-303-370(5)(c)).</p> <p><u>Requirement.</u> Add to the contingency plan the procedures to be followed if a damaged shipment cannot be transported. Notification of DOE/RL and Ecology is appropriate, but the procedures for stabilizing, isolating, and containing the damaged shipment must be explained in full, as well as the process for notifying Ecology and DOE/RL.</p> <p><u>DOE-RL/WHC Response:</u> Text will be modified when the Building Emergency Plan for the Central Waste Complex is revised.</p>	03/12/93

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35.	<p><u>Page 3-1, line 7.</u> <u>Comment:</u> Once again the language regarding radioactive waste is included in the text.</p> <p><u>Requirement.</u> See comment and requirement number 3.</p> <p><u>DOE-RL/WHC Response:</u> Refer to disposition number 3.</p> <p><u>Ecology Comment:</u> Refer to comment number 3.</p> <p><u>DOE-RL/WHC Response 2:</u> Refer to DOE-RL/WHC Response 2 for comment number 3.</p>	
36.	<p><u>Page 3-1, line 27.</u> <u>Comment:</u> The WAC 173-303-9904 and -9905 lists are not included in the description of the types of waste that could be stored at the RMW.</p> <p><u>Requirement.</u> Update this section to include all potential waste streams that may be stored at the RMW.</p> <p><u>DOE-RL/WHC Response:</u> Text will be revised to include WAC 173-303-9904 and -9905.</p>	03/12/93
37.	<p><u>Page 3-1, line 30.</u> <u>Comment:</u> By use of the word "mixed", Ecology assumes the permittee means dangerous waste that also contains radioactive components, and not that the waste is "stirred" or "combined".</p> <p><u>Requirement.</u> Rephrase this sentence to clearly state the intention of the permittees.</p> <p><u>DOE-RL/WHC Response:</u> Text will be revised to read "mixed waste".</p>	03/12/93
38.	<p><u>Page 3-1, line 41.</u> <u>Comment:</u> Polychlorinated biphenyls (PCBs) are regulated under the Toxic Substances Control Act (TSCA), which is currently administered by the Environmental Protection Agency (EPA).</p> <p><u>Requirement.</u> Additional information must be submitted by the permittee to determine compliance with TSCA, pursuant to WAC 173-303-806(4)(a)(xix) and 40 CFR 270.14(b)(20).</p>	03/12/93

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	DOE-RL/WHC Response: It is inappropriate for a RCRA permit application to address TSCA in sufficient detail to "determine compliance." Additionally, Ecology has no regulatory authority over TSCA. Demonstration of compliance with TSCA requirements is under 40 CFR 270.14(b)(20).	
39.	<p>Page 3-2, line 27. <u>Comment:</u> WAC 173-303-300(5) requires a Waste Analysis Plan that includes sampling.</p> <p><u>Requirement.</u> The Draft Hanford Permit requires the submittal of a Facility-wide Waste Analysis Plan. This plan, once approved, sets the standard for the unit-specific Waste Analysis Plan. Please refer to it and make the necessary changes to this chapter in order to comply.</p> <p>DOE-RL/WHC Response: (Hanford Facility Permit comment II.D) The commenters have three concerns relative to Section II.D in general. (1) There is no specific regulatory requirement for a separate facility wide waste analysis plan. The compilation of unit-specific plans meets all the regulatory requirements, and therefore meets the requirements of a facility waste analysis plan. (2) It is unprecedented that if a document is not written to Ecology's expectations in the second revision it becomes a noncompliance issue. (3) No reasonable explanation is given for why unit-specific waste analysis plans will be used only for "back up" in the interim period before the units are incorporated into the permit. This entire section should be deleted. Justification for these three concerns follows.</p> <p>Each TSD unit on the Hanford Facility has a unit-specific waste analysis plan that meets all of the regulatory requirements stipulated in WAC 173-303-300. Ecology's regulations require that a dangerous waste facility operator must confirm his or her knowledge of the wastes managed before treating, storing, or disposing of the waste. The relevant regulations found at WAC 173-303-300(1) "GENERAL WASTE ANALYSIS," state: <i>Purpose. This section requires the facility owner or operator to confirm his knowledge about a dangerous waste before he stores, treats, or disposes of it. The purpose for the analysis is to insure that a dangerous waste is managed properly. Because the regulations only require permits for TSD waste management activities, and all of the Hanford Facility TSD units have unit-specific waste analysis plans that meet all of the regulatory requirements, there is no need for a separate facility wide waste analysis plan.</i></p>	03/12/93

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The specific regulatory requirement for a waste analysis plan is found at WAC 173-303-300(5), which states: *Waste analysis plan. The owner or operator shall develop and follow a written waste analysis plan which describes the procedures he will use to comply with the waste analysis requirements of subsections (1), (2), (3), and (4) of this section. He must keep this plan at the facility, and the plan must contain at least:*

- (a) *The parameters for which each dangerous waste will be analyzed, and the rationale for selecting these parameters;*
- (b) *The methods of obtaining or testing for these parameters;*
- (c) *The methods for obtaining representative samples of wastes for analysis (representative sampling methods are discussed in WAC 173-303-110(2));*
- (d) *The frequency with which analysis of a waste will be reviewed or repeated to ensure that the analysis is accurate and current;*
- (e) *The waste analyses which generators have agreed to supply;*
- (f) *Where applicable, the methods for meeting the additional waste analysis requirements for specific waste management methods as specified in 40 CFR Part 265 Subparts F through R for interim status facilities and in WAC 173-303- 630 through 173-303-670 for final status facilities; and*
- (g) *For off-site facilities, the procedures for confirming that each dangerous waste received matches the identity of the waste specified on the accompanying manifest or shipping paper. This includes at least:*
 - (i) *The procedures for identifying each waste movement at the facility; and*
 - (ii) *The method for obtaining a representative sample of the waste to be identified, if the identification method includes sampling.*

As noted previously, each TSD unit on the Hanford Facility has a unit-specific waste analysis plan that meets the regulatory criteria in WAC 173-303-300(5). Again, the compilation of these plans will meet the requirements of a facility waste analysis plan.

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40.	<p><u>Page 3-4, line 20.</u> <u>Comment:</u> This section states that Solid Waste Engineering can approve the type of container that waste is shipped in from off-site or to an off-site facility. The Dangerous Waste regulations governing this activity are clearly listed in WAC 173-303-190, and any deviation from this section constitutes non-compliance.</p> <p><u>Requirement.</u> Any waste from off-site and any waste destined to be sent off-site must meet the packaging requirements of WAC 173-303-190. Reword this section to state the same.</p> <p>DOE-RL/WHC Response: Text will be revised to include "U.S. Department of Transportation-approved packages."</p>	03/12/93
41.	<p><u>Page 3-5, line 2.</u> <u>Comment:</u> An overall benefit of the sampling and lab analysis of mixed waste containers is increasing the safety of workers and the environment by knowing precisely what wastes are contained in a drum. It also prevents situations like the recent problems at the tank farm regarding waste designation and labeling, and possible problems like the 183-H drum swelling.</p> <p><u>Requirement.</u> Adherence to the Facility-wide waste analysis plan is required. This plan must meet the requirements of Chapter 173-303 WAC. It is anticipated that some sampling and analysis will take place at the RMW in the future.</p> <p>DOE-RL/WHC Response: Refer to disposition number 39. Also, refer to disposition number 42.</p>	03/12/93
42.	<p><u>Page 3-5, line 18.</u> <u>Comment:</u> What about the 183-H basins waste stream? It is clear that there was indeed incomplete knowledge of the materials and processes producing the waste.</p> <p><u>Requirement.</u> Ecology will require that there be some level of sampling and waste analysis carried out at the RMW prior to receiving a final status permit.</p>	03/12/93

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<p>DOE-RL/WHC Response: The 183-H Solar Evaporation Basins waste was adequately characterized. The expansion and corrosion problems of the 183-H Solar Evaporation Basins waste streams was due to the need for more rigorous packaging requirements.</p>	<p>Currently, annual audits are performed on offsite generators and onsite waste generating units. Waste is not accepted from offsite generators and onsite generating units who have not passed their audit. Refer to Chapter 3.0, Section 3.2, "Waste Analysis Plan" for details on the auditing process.</p>	
<p>The "some level of sampling and waste analysis" requirement extends Ecology's regulatory control beyond that required to ensure compliance and beyond the authority provided in the regulations. This requirement also unduly decreases management efficiency, and unduly increases costs. Analytical verification is specifically limited by WAC 173-303-300(3) to TSD units receiving offsite generated waste. Onsite waste is allowed by WAC 173-303-300(2) to be managed using "generator knowledge", i.e., documented characteristics and makeup of the waste material being submitted for treatment, storage, and/or disposal (Refer to Hanford Facility Permit comments II.D. and III.1.B.v.).</p>	<p>This issue is being resolved as part of the Hanford Facility permitting effort.</p>	
<p>43. <u>Page 3-5, line 21.</u> <u>Comment:</u> This line calls for the certification of the waste on the manifest prior to receiving the waste.</p>	<p><u>Requirement.</u> What are the specific requirements for certifying the waste? State the specific requirements in this section or add it in another section or an appendix.</p>	03/12/93
<p>DOE-RL/WHC Response: Refer to Chapter 3.0, Section 3.2.4.</p>		

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44.	<p><u>Page 3-5, line 25.</u> <u>Comment:</u> This line states that off-site and on-site generators must comply with the WHC waste acceptance criteria.</p> <p><u>Requirement.</u> The regulations governing waste designation and manifesting are covered in WAC 173-303. See the comment and requirement for number 31.</p> <p><u>DOE-RL/WHC Response:</u> Refer to disposition number 31.</p> <p><u>Ecology Comment:</u> Please indicate if the WHC waste acceptance criteria meets WAC 173-303-300 and 40 CFR criteria for waste analyses. These are the regulations which apply to this section of the permit application.</p> <p><u>DOE-RL/WHC Response 2:</u> The Hanford Site Solid Waste Acceptance Criteria was written to address the applicable WAC 173-303 and 40 CFR requirements. In addition, WAC 173-303 and 40 CFR are referenced where appropriate throughout the Hanford Site Solid Waste Acceptance Criteria. Ecology was provided a copy of this document as well as all subsequent revisions. Mr. T. B. Michelena of Ecology, and Mr. D. L. Duncan of the EPA were, and still are, on the distribution list. However, on June 14, 1993, the EPA transmitted NODs on the 616 NRWSF and 305-B Storage Unit waste analysis plans. Resolution of these comments might require that the Waste Acceptance Criteria be revised.</p>	
45.	<p><u>Page 3-5, line 35.</u> <u>Comment:</u> Generators are not solely responsible for waste analysis. The RMW, as a TSD, is also responsible for ensuring the accuracy of the manifests and waste shipments it receives, under the Chapter 173-303 WAC.</p> <p><u>Requirement.</u> Reword this statement to clarify that it is the permittees intent to make the generators responsible for waste designation and manifesting prior to shipment to the RMW, but that RMW is also responsible under the regulations for the wastes accepted. Alternatively, delete this sentence.</p> <p><u>DOE-RL/WHC Response:</u> Text will be revised to delete the word 'solely'. The RMW Storage Facility only inspects the documentation and containers for condition and labeling.</p> <p>Refer to disposition number 42.</p>	03/12/93

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46.	<p><u>Page 3-6, line 28. Comment:</u> The return of damaged or otherwise unacceptable waste shipments to the generator unit, whether on-site or off, is not allowed. In the letter from T. Nord to S. Wisness, dated 12/10/90, Ecology made it clear that the delivery of waste shipments to generator units is a violation of Chapter 173-303 WAC.</p> <p><u>Requirement.</u> The returning of any shipments to the generator units is not allowed. Only those off-site facilities or on-site units that have a valid interim status or final status to permit to treat, store, and/or dispose of dangerous wastes (including mixed wastes) may accept waste shipments. This option must be deleted.</p> <p><u>DOE-RL/WHC Response:</u> The regulations in WAC 173-303 require that both the generator and the TSD unit properly manage waste. The offsite generator and the onsite generating unit must transport dangerous waste to a TSD unit only. The TSD unit is required to only accept appropriately designated and documented waste. Even though much of the Hanford Facility waste is generated onsite, a TSD unit must have the authority to accept or reject waste. If a TSD unit accepts poorly documented waste, the TSD unit could be in violation of WAC 173-303. If the TSD unit only can accept and not reject, why does the TSD unit need to 'verify' the waste? If the waste is rejected, the waste could be returned to the offsite generator or the onsite generating unit where the waste would be placed in a 90-day storage area or a cleanup 'foot-print' area. These areas would be regulated. Text will remain unmodified.</p>	03/12/93

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47.	<p><u>Page 3-6, line 50.</u> <u>Comment:</u> Once again the permittees reference a waste acceptance criteria, presumably the WHC requirements.</p> <p><u>Requirement.</u> Chapter 173-303 WAC is the governing document for dangerous waste management activities, including waste acceptance at TSDs. If WHC submits the acceptance criteria to Ecology for review, and Ecology approves it, then it may be appropriate to reference this document. Until such time, Chapter 173-303 WAC must be referenced regarding waste acceptance criteria.</p> <p>DOE-RL/WHC Response: Refer to disposition number 32.</p> <p>Ecology Comment: Please denote if the waste acceptance criteria specified by WHC meets the WAC and 40 CFR requirements. Provide the document or copies of the section which demonstrate that this document is in compliance with State and Federal regulations.</p> <p>DOE-RL/WHC Response 2: Refer to DOE-RL/WHC Response 2 for comment number 44.</p>	
48.	<p><u>Page 3-10, line 15.</u> <u>Comment:</u> This paragraph continues DOE/WHCs contentions against performing sampling of the waste received at RMW.</p> <p><u>Requirement.</u> Refer to the previous comments regarding sampling and analysis at the RMW.</p> <p>DOE-RL/WHC Response: Refer to disposition numbers 39 and 42.</p>	03/12/93
49.	<p><u>Page 3-10, line 22.</u> <u>Comment:</u> Any sampling and test method not specifically approved in WAC 173-303-110 must be petitioned to Ecology and approved prior to use.</p> <p><u>Requirement.</u> Add wording to this sentence to affirm the above. Equivalent methods must be approved by Ecology prior to use, pursuant to WAC 173-303-110(5).</p> <p>DOE-RL/WHC Response: Text will be revised to reference WAC 173-303-110(5).</p>	03/12/93

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50.	<p><u>Page 3-10, line 31.</u> <u>Comment:</u> See the previous comments on verification sampling. <u>Requirement.</u> See previous requirements. DOE-RL/WHC Response: Refer to disposition numbers 39 and 42.</p>	03/12/93
51.	<p><u>Page 3-10, line 33.</u> <u>Comment:</u> The dates referenced on the sampling and analysis methods are outdated. It is more appropriate to state "as amended", rather than giving a date. <u>Requirement.</u> Remove the dates from these methods and add "as amended" to the references. This will save having to continually update the references. DOE-RL/WHC Response: Text will be revised to read "as amended".</p>	03/12/93
52.	<p><u>Page 3-10, line 45.</u> <u>Comment:</u> Chain-of-custody is discussed regarding radioactive wastes. <u>Requirement.</u> SW-846 also requires proper chain-of-custody protocols be followed, as do all of the test methods referenced. Add to this section that proper chain-of-custody will be followed for all sampling activities. DOE-RL/WHC Response: Text will be modified to include that appropriate chain-of-custody protocols will be followed for all referenced sampling methods. Refer to disposition number 3 regarding radioactive waste.</p>	03/12/93
53.	<p><u>Page 3-11, line 39.</u> <u>Comment:</u> Waste management control practices are discussed for off-site wastes. <u>Requirement.</u> See the previous comments on the Waste Analysis Plan and sampling at the RMW. DOE-RL/WHC Response: Refer to disposition numbers 39 and 42.</p>	03/12/93

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54.	<p><u>Page 3-12, line 17.</u> <u>Comment:</u> This section is lacking in detail.</p> <p><u>Requirement.</u> Expand this section to fully describe how the wastes are handled in accordance with WAC 173-303-630(8) and (9). In particular, how are wastes stored within the same building isolated from other containers with incompatible wastes. Be specific regarding the containment (diking, berming, etc.). Alternatively, reference another section of this application, if the information can be found there.</p> <p>DOE-RL/WHC Response: Text will be revised to incorporate the following information.</p> <p>Waste packages are segregated according to storage categories to prevent accidental commingling of incompatible waste. Each waste package is assigned to only one storage category (e.g., flammable storage, oxidizer storage, acid storage, caustic storage, combustible storage (class 11), nonmixed waste storage, flammable acid storage, flammable caustic storage, combustible acid (Class 11) storage, other mixed waste storage). Once waste packages are accepted for storage, the packages are transferred to an appropriate storage structure (e.g., Low-Flash-Point Mixed Waste Storage Modules, etc.) that is designated for the waste type and storage categories assigned to the waste package. Spacing and stacking requirements also will be adhered to (containers stacked no more than three high, compatible waste containers - minimum of 30-inch (76.2-centimeters) spacing, incompatible waste containers - minimum of 6-foot (1.83 meters) spacing,</p> <p><u>Ecology Comment:</u> The above stated is fine, except that on page 3-12, line 31, there is a reference to figure 3-1 as being a compatibility chart. This list is outdated, and USCG compatibility references are found in 46 CFR, 49 CFR and the Federal Register (HM-181). New compatibility charts and regulations were promulgated in 1991. These rules are in effect at this time, and must be complied with by 1995. This text must be modified to incorporate the updated requirements.</p> <p>DOE-RL/WHC Response 2: Accept. Text will be revised to incorporate the updated requirements which will be complied with by 1995 as required.</p>	

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55.	<p><u>Page 3-12, line 47. Comment:</u> It is not clear from this section that all waste stored in the RMW facility meets the LDR requirements under 40 CFR 268. This section does not address noncompliance of LDR waste at the RMW facility. Effective May 9, 1992 the two-year national capacity variance for RMW subject to LDR expires. Has DOE-RL applied for a date extension?</p> <p><u>Requirement.</u> Clarify if any radioactive mixed/hazardous waste subject to LDR has been stored for a period of over one year from that allowed in 268.50. Revise this section to indicate what will be done in the event that LDR restricted waste is accepted at the RMW facility. Clarify if an extension request has been submitted to EPA for LDR wastes.</p> <p>DOE-RL/WHC Response: Text will be revised to include: "As indicated in the 1992 Report on Hanford Site Land Disposal Restrictions for Mixed Wastes (DOE-RL 1992), the waste stored at the RMW Storage Facility is restricted from land disposal because it contains solvent waste (40 CFR 268.30) or by the Third-Third Promulgation (55 FR 106). The Third-Third Promulgation provided for a 2-year national capacity variance from the land disposal restrictions for mixed waste. This variance allowed for the continued storage of this waste until May 8, 1992. The Tri-Party Agreement allows for continued storage of this waste until sufficient treatment capacity is available in accordance with the schedules in the Tri-Party Agreement. All documentation associated with the land disposal restricted waste will be handled as described in Chapter 12.0, Section 12.4.2.2.7."</p>	03/12/93
56.	<p><u>Page T3-4, line 5. Comment:</u> The proper ASTM method for crushed or powdered material is ASTM D346-75, not D364.75.</p> <p><u>Requirement.</u> Correct the reference on this line to ASTM D346-75.</p> <p>DOE-RL/WHC Response: Text will be revised to read "ASTM D346-75."</p>	03/12/93

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57.	<p><u>Page T3-4, line 8.</u> <u>Comment:</u> There is another typo in the reference to the ASTM method. <u>Requirement.</u> Change the reference from ASTM D2234-76 to ASTM D2234-86. <u>DOE-RL/WHC Response:</u> Text will be revised to read: "ASTM D2234-89."</p>	
	<p><u>Ecology Comment:</u> The DOE response has a typo. The correct revision is ASTM D2234-86. Please correct.</p>	
	<p><u>DOE-RL/WHC Response 2:</u> Based on verification results, the correct ASTM is D2234-89, not D2234-86.</p>	
58.	<p><u>Page 4-1, line 19.</u> <u>Comment:</u> Alternate packages must be approved by the Department of Transportation (DOT). <u>Requirement.</u> Add to this section the requirement that alternate packaging will be in accordance with DOT regulations.</p>	03/12/93
	<p><u>DOE-RL/WHC Response:</u> Text deleted.</p>	
59.	<p><u>Page 4-2, line 19.</u> <u>Comment:</u> This section is correct in that state-only codes must be added to incoming drums beginning 1/92. Waste drums currently stored do not need to be changed until they are moved from their current positions in the RMW. <u>Requirement.</u> Add to this section the requirement that state-only codes will also be added to drums upon being moved, either to another building within the RMW, or to another TSD facility. <u>DOE-RL/WHC Response:</u> Text will be revised.</p>	03/12/93
60.	<p><u>Page 4-2, line 26.</u> <u>Comment:</u> "Other available methods" are discussed regarding securing lids on drums. <u>Requirement.</u> The "other available methods" must be discussed in full in this permit application prior to Ecology approval of any alternative method to the standard drum ring and locknut.</p>	03/12/93

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	<p>DOE-RL/WHC Response: The phrase "other available methods..." means to provide a reliable seal and for future improvements in sealing 55-gallon (208-liter) container lids. The text will be revised to read: "to meet U.S. Department of Transportation requirements".</p>	
61.	<p><u>Page 4-2, line 33.</u> <u>Comment:</u> Wooden pallets are discussed regarding the storage of drums.</p> <p><u>Requirement.</u> See comment and requirement number 2.</p> <p>DOE-RL/WHC Response: Refer to disposition number 2.</p>	03/12/93
62.	<p><u>Page 4-2, line 36.</u> <u>Comment:</u> This line states that, since drums are currently stacked 3 drums high, heavier drums are rotated to the bottom to ensure a low center of gravity.</p> <p><u>Requirement.</u> Please discuss in greater detail how it is determined which group of four drums is heavier, and is there any discrimination given to which of the four drums on a pallet is heaviest, lightest, etc. The current practice of stacking drums three tiers high may be continued for those containers which do not contain free liquids. Those containers which contain sufficient absorbents or are otherwise packaged in such a manner that no liquids would be released if a drum were to fall from the third tier may be stacked three (3) high. Drums containing liquids that would be released in this scenario may only be stacked two tiers high.</p> <p>DOE-RL/WHC Response: Container weight is required to be labeled on the top and sides of every container. Four 55-gallon (208-liters) containers banded to a pallet is a very stable unit, especially when stacked in rows with 30-inch (76.2-centimeter) wide aisle space for inspection. In addition, every attempt is made to keep containers of the same waste stream together in an effort to reduce weight variability. Therefore, palletized container weight is only a parameter of concern for floor loading. Acceptance and storage of unusually heavy containers [e.g., 5,000 pounds (2,273 kilograms)] are handled on a case-by-case basis. These containers require labeling stating "Bottom Tier Stacking Only". Containers containing liquids are packaged with twice the absorbent material, which greatly reduces the chances of a liquid spill in the event a container should tip over and rupture.</p>	03/12/93

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63.	<p><u>Page 4-2, line 47. Comment:</u> Upon receipt at the RMW, labels must be affixed identifying the contents of the drum. This points out the deficiency of not doing verification sampling at the RMW. If containers retrieved from the Low-Level Burial Grounds (LLBG) are not properly labeled, and potentially not labeled at all, how will the RMW handle this waste stream?</p> <p><u>Requirement.</u> There is insufficient information in this section regarding receipt of waste drums from the LLBG. More information regarding the handling of unlabeled, unknown, or partially labeled drums must be included in this permit application. Also, see the previous comments regarding sampling at the RMW.</p> <p>DOE-RL/WHC Response: Text will be revised to provide additional information on the handling of containers which are poorly labeled (e.g., weathered or deteriorated) or have limited verification (e.g., head gas analysis, document review)</p> <p>Refer to disposition numbers 39 and 42 regarding sampling at the RMW Storage Facility.</p> <p><u>Ecology Comment:</u> Please state how all State (WAC 173-303) and Federal (49 CFR) requirements regarding labeling and waste testing of drums will be followed.</p> <p>DOE-RL/WHC Response 2: At the time of retrieval, containers will be assayed, x-rayed, and the head space analyzed for volatiles and semi-volatile compounds. The x-ray system will be able to detect the presence of free liquids, as well as identify the type of waste in the container. In addition, records of the waste will provide process knowledge about the waste. This information will be used to identify the hazards; the appropriate labels will be applied to the containers before acceptance at the RMW Storage Facility for storage.</p> <p>The text will be revised to better explain the labeling strategy for retrieved containers.</p>	

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64.	<p><u>Page 4-3, line 8. Comment:</u> There is currently no containment for the Waste Receiving and Staging Area, since it handles radioactive only wastes.</p> <p><u>Requirement.</u> If this area is to be used for dangerous and mixed waste handling it must meet the WAC 173-303-395(4) requirements for containment. If it is intended for radioactive wastes only, then it will be a condition of the permit that no dangerous or mixed waste may be handled in this area.</p> <p>DOE-RL/WHC Response: Mixed waste containers are not stored on the Waste Receiving and Staging Area. Mixed waste will remain on the truck(s) if a problem is detected on the waste tracking forms or if an inspection reveals a problem with the container(s).</p> <p>Ecology Comment: WAC 173-303-395 (4) clearly states that loading and unloading areas must be designed, constructed, operated and maintained to contain spills and leaks that might occur during loading and unloading. Some type of containment is necessary in the staging area in case of accidental leaks during operations.</p> <p>DOE-RL/WHC Response 2: No mixed waste containers are stored, handled, loaded, unloaded, etc., on the Waste Receiving and Staging Area. Mixed Waste will remain on the truck(s) until waste tracking forms are checked against the shipment received and any problem detected are resolved. Once the waste tracking forms have been checked and any problems resolved, the truck will then relocate to one of the various radioactive and/or mixed waste storage buildings in the RMW Storage Facility for unloading. Therefore, WAC 173-303-395(4) is not applicable to the Waste Receiving and Staging Area because no mixed waste is handled within this area. If liquid dangerous waste is received at the RMW Storage Facility, the loading and unloading areas used do comply with WAC 173-303-395(4).</p>	
65.	<p><u>Page 4-3. Comment:</u> The wooden pallets that the drums sit on may be exposed to chemical hazards during and following the release of wastes. This exposure could damage the pallets and make them structurally unstable.</p> <p><u>Requirement.</u> Please describe in this section how the pallets will be assured of their integrity following a spill or release of wastes that impact the pallets.</p>	

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	<p>DOE-RL/WHC Response: Pallets contaminated from a spill or release of waste will be treated as waste accordingly. Pallets will be removed and segregated for storage and/or disposal based on the nature of the contaminate(s).</p>	
	<p><u>Ecology Comment:</u> How will the structural integrity of the pallets be determined if a spill occurs. If contaminants from a spill are at such low levels that disposal of the pallet is unnecessary, what precautions are taken to ensure that the pallets will be sturdy enough to continue to bear the weight of the drums.</p>	
	<p>DOE-RL/WHC Response 2: Many woods are not permeable in spite of their highly porous structure. Therefore, it is unlikely that a spill or release of waste will affect pallet strength unless external damage is observable. In the event of a spill or release of waste where the spread of chemical contaminants has been limited to no more than two adjacent slates of the wood pallet, structural integrity is maintained. In cases where a chemical spill or release of waste has reached the riser of the wooden pallet, the structural integrity could be compromised and the pallet will be disposed of. A visual inspection will be provided for each affected pallet.</p>	
66.	<p><u>Page 4-4, line 16. Comment:</u> Any overflow from secondary containment must be sampled for designation status.</p> <p><u>Requirement.</u> Describe in this section, or reference to the contingency plan section, how wastes that have escaped from secondary containment will be sampled and analyzed.</p>	
	<p>DOE-RL/WHC Response: Refer to Chapter 4.0, Section 4.1.1.7.</p>	
	<p><u>Ecology Comment:</u> This section is not detailed enough in explaining how spilled wastes will be sampled and/or treated. Please cite in section 4.1.1.7 or 4.1.1.8 a reference to the Building Emergency Plan, section 4.2-Identification of Hazardous Materials.</p>	
	<p>DOE-RL/WHC Response 2: The Building Emergency Plan for the Central Waste Complex will be revised to indicate that spilled waste will be sampled and analyzed if necessary.</p>	

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67.	<p><u>Page 4-4, line 34.</u> <u>Comment:</u> Leaks from containers are discussed.</p> <p><u>Requirement.</u> Containers that leak more than 10 gallons to secondary containment must be reported to Ecology in accordance with WAC 173-303-145.</p> <p><u>DOE-RL/WHC Response:</u> As per the revised WAC 173-303 requirements, leaks or spills to an engineered secondary containment system no longer need to be reported.</p> <p><u>Ecology Comment:</u> Ecology is following the draft Hanford Site-Wide Permit, section II.A.3 regarding spills, and WAC 173-303-145 (2) (c) (ii). All spills in excess of 10 gallons shall be reported to Ecology.</p> <p><u>DOE-RL/WHC Response 2:</u> There is currently no Hanford Facility Permit to follow. Disposition of this comment is dependant upon resolution of this Hanford Facility issue.</p>	
68.	<p><u>Page 4-4, line 49.</u> <u>Comment:</u> Reliance on process knowledge for wastes that have been spilled, mixed, diluted, stabilized, adsorbed, etc. is not appropriate.</p> <p><u>Requirement.</u> This section is inadequate. In this sentence in particular, the waste analysis plan in section 3.2 falls short of the required elements of a waste analysis plan. Sampling and analysis of the wastes described must be performed if the contents of the drums have been altered by dilution, mixing, etc. See the previous comments on the waste analysis plan.</p> <p><u>DOE-RL/WHC Response:</u> Refer to disposition numbers 39 and 42.</p>	03/12/93

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69.	<p><u>Page 4-5, line 31.</u> <u>Comment:</u> Visual inspection for contamination is not adequate.</p> <p><u>Requirement.</u> This section must have the addition of a minimum screening that will be done on liquids collected in the containment system. This could also be added to the waste analysis plan section or the contingency plan section.</p> <p>DOE-RL/WHC Response: Refer to disposition number 23.</p> <p><u>Ecology Comment:</u> Visual inspection of water is an inefficient form of examination for contaminants, unless one is looking for particulate contamination. Not all contaminants exhibit visual signs. Contamination by unknown constituents can only be detected by analytical processes. Verification analyses must be performed to determine if contaminants are present.</p> <p>DOE-RL/WHC Response 2: Refer to DOE-RL/WHC Response 2 for comment number 23.</p>	
70.	<p><u>Page 4-7, line 7.</u> <u>Comment:</u> More detail regarding activities related to ignitable and reactive waste handling must be added to this section. For example are non-sparking tools or used? Container bonding, intrinsically safe devices, etc. should also be listed if they are used.</p> <p><u>Requirement.</u> Increase the level of detail in this section, or reference to a section that contains the above information.</p> <p>DOE-RL/WHC Response: Text will be revised.</p> <p>The RMW Storage Facility expects to receive approximately 46 U.S. Department of Transportation-approved packages of alkali metal waste. This waste will be stored in safety storage modules (refer to disposition number 100) until a new storage unit can be constructed. These safety storage modules will be procured specifically for the storage of alkali metal waste [e.g., will have blow-out panels, will be all metal construction, will have no fire-water suppression system (sodium extinguishers will be available), etc.,] and will be physically separated per Uniform Fire Code (NFPA 1989).</p>	03/12/93

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71.	<p><u>Page T4-1.2, line 5.</u> <u>Comment:</u> During the inspection of the RMW in June of 1991, Ecology noted the accumulation of trash and wind-blown dirt in the containment area for the mixed waste storage pad. In conjunction with the area occupied by the wooden pallets, this debris is impacting the containment volume for the mixed waste storage pad.</p> <p><u>Requirement.</u> It is necessary to ensure that trash and dirt do not accumulate in the mixed waste storage pad. Measures should be taken in the inspection section of this permit application to address this problem. It may also be necessary to take some measures to prevent wind-blown dirt from entering the storage pad. Maintaining the mixed waste storage pad is vital to protecting the environment in the event of a release.</p> <p><u>DOE-RL/WHC Response:</u> All of the 55-gallon (208-liter) containers previously stored on the Mixed Waste Storage Pad have been placed into 85-gallon (322-liter) overpacks and relocated to the 2403-WA Radioactive and/or Mixed Waste Storage Building. The RMW Storage Facility intends to use available space in the enclosed storage structures (e.g., 2403-WA) for the storage of mixed waste.</p> <p>Inspection of the Mixed Waste Storage Pad is performed weekly and any housekeeping duties are performed as necessary.</p> <p>In addition, efforts are underway to install a structure over the Mixed Waste Storage Pad to prevent the accumulation of windblown sediments and the accumulation of rain water.</p>	03/12/93
72.	<p><u>Page 6-2, line 28.</u> <u>Comment:</u> The details required by WAC 173-303-320 and WAC 173-303-630(6) are not included in this section. This section must include a daily inspection of loading/unloading areas when they are in operation, the report sheet must include the information required by WAC 173-303-320(2)(d), and must include weekly inspections of the emergency equipment listed in the contingency plan. Each item listed in the contingency plan (Appendix 7A) must be documented by type, and be in adequate condition, and in the quantities listed. Also, there are no specific requirements for inspecting the floor coatings, which are the primary mechanism, in conjunction with the floor and curbing, to protect human health and the environment.</p>	03/12/93

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	<p><u>Requirement.</u> Refer to the <u>616 Nonradioactive Dangerous Waste Storage Facility Dangerous Waste Permit Application</u>, Revision 2, dated 10/31/91 for guidance. Add the information required above to this section. Revise the forms used for the inspections.</p> <p>DOE-RL/WHC Response: The current frequency for inspections of all the structures at the RMW Storage Facility is weekly [as specified in WAC 173-303-360(6)]. This frequency satisfies regulatory requirements and is based on the rate of possible deterioration of equipment and containers. Inspection frequency could be increased should conditions warrant.</p> <p>In the current inspection checksheet (Chapter 6.0, Page F6-1), item number 6 addresses the inspection of the containment curbing and flooring.</p>	
73.	<p><u>Page 6-5, line 34.</u> <u>Comment:</u> This section does not adequately address the requirements of WAC 173-303-340(2). Portable two-way radios are apparently relied on for providing access to communication equipment, but are barely mentioned.</p> <p><u>Requirement.</u> Review the requirements of WAC 173-303-340(2) and add the required information to this section. Particular attention should be paid to the requirement for "immediate access" to communication equipment.</p> <p>DOE-RL/WHC Response: All nuclear operators working in the RMW Storage Facility structures carry two-way portable radios. Also, a public address system is located in the 2403-WA Radioactive and/or Mixed Waste Storage Building. Also, there is a public address system in the 272-WA Building. Portable radios and word-of-mouth are used to provide communication where public address is not available. There also is a telephone in the 2403-WA Radioactive and/or Mixed Waste Storage Building and at both Staging Areas.</p>	03/12/93
74.	<p><u>Page 6-6, line 44.</u> <u>Comment:</u> This line states that there are portable extinguishers in or near all of the buildings at the RMW. Why are there only two extinguishers at the Low-flash-point (lfp) mixed waste storage modules?</p> <p><u>Requirement.</u> Explain in this section the rationale for having only two extinguishers at the lfp modules, or make a change and increase the number of portable extinguishers at the modules.</p>	03/12/93

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	<p>DOE-RL/WHC Response: The NFPA-10 requires one 20-pound (9.1-kilogram) ABC portable fire extinguisher to be available to personnel located within 75 feet (22.9 meters) maximum travel distance and to be protected against the weather. The two portable fire extinguishers satisfy this requirement.</p>	
75.	<p><u>Page 6-8, line 9.</u> <u>Comment:</u> An approved unloading area is mentioned.</p> <p><u>Requirement.</u> State where these "approved waste unloading areas" are, and how they are intended to meet Chapter 173-303 WAC.</p> <p>DOE-RL/WHC Response: Waste containers are unloaded near the entrances to the various RMW Storage Facility structures and waste containers are unloaded in accordance with WAC 173-303-806(4)(a)(vii)(A).</p>	03/12/93
76.	<p><u>Page 6-8, line 9.</u> <u>Comment:</u> More detail is necessary regarding loading and unloading and movement of containers.</p> <p><u>Requirement.</u> Include in this section information on how containers are handled individually i.e., moved by hand, overhead lift, hand truck, etc. Also, how are the containers kept upright, especially while on the pallets? How are containers secured to the pallets?</p> <p>DOE-RL/WHC Response: Text will be modified to include the following.</p> <p>The Low-Flash-Point Mixed Waste Storage Modules use a portable unloading platform. This portable unloading platform is placed in front of a Low-Flash-Point Mixed Waste Storage Modules that is to receive a waste shipment. The truck is backed into place, and the containers are moved from the truck to the Low-Flash-Point Mixed Waste Storage Modules across the portable unloading platform.</p> <p>In general, transport vehicles are positioned near the receiving building in a manor that provides an unobstructed work area for a powered forklift to off load the containers. Containers are placed into the storage buildings using an appropriate container handling device (e.g., forklift, handtruck, or pallet jack). Containers are stacked four to a pallet and banded to the pallet (refer to disposition numbers 2 and 62).</p>	03/12/93

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77.	<p><u>Page 6-8, line 48.</u> <u>Comment:</u> Loss of the fire alarm system does constitute a contingency event that must be dealt with. It is not acceptable to leave a storage unit of this size without fire protection for any period of time.</p> <p><u>Requirement.</u> State in this section what actions will be taken in the event that the fire alarm system fails due to loss of power or other means.</p> <p><u>DOE-RL/WHC Response:</u> Text will be revised. Chapter 6.0, Section 6.4.4, incorrectly states that the loss of power would result in deactivation of the fire alarms. The fire alarm systems are equipped with battery backup capabilities that automatically will operate should there be a loss of normal electrical power.</p> <p><u>Ecology Comment:</u> If a loss of power does not affect the fire alarm system, why then is this stated? Does the battery backup system automatically engage when a loss of power results, or does it need to be manually engaged? If the system is automatic, this must be stated in the Permit Applications.</p> <p><u>DOE-RL/WHC Response 2:</u> All fire alarms are supplied with a 60-hour battery backup system, which automatically engages when there is a failure of the normal power supply. The text will be revised to describe the backup capability of the alarms.</p>	
78.	<p><u>Page 6-9, line 5.</u> <u>Comment:</u> Personnel protection equipment is not adequately addressed in this section, particularly in regard to spill response.</p> <p><u>Requirement.</u> Expand the discussion of personnel protection equipment, or reference another section that does. More detail is needed regarding equipment other than respirators.</p> <p><u>DOE-RL/WHC Response:</u> Text will be revised to reference Appendix 7A - Building Emergency Plan for the Central Waste Complex.</p>	03/12/93

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79.	<p><u>Page 6-10, line 15.</u> <u>Comment:</u> This section has been provided to EPA's TSCA compliance section for review.</p> <p><u>Requirement.</u> Comments on the TSCA compliance issues at this unit will be provided in future NOD's.</p> <p>DOE-RL/WHC Response: No response required at this time.</p> <p><u>Ecology Comment:</u> This comment was referred to EPA.</p> <p>DOE-RL/WHC Response 2: No response required at this time.</p>	
80.	<p><u>Page 6-10, line 35.</u> <u>Comment:</u> Incompatible wastes will not be stored together unless "proper precautions" are taken.</p> <p><u>Requirement.</u> Define these "proper precautions" in full and explain how they will prevent the contact of incompatible wastes</p> <p>DOE-RL/WHC Response: Refer to disposition number 54.</p> <p><u>Ecology Comment:</u> Refer to comment number 54.</p> <p>DOE-RL/WHC Response 2: Refer to DOE-RL/WHC Response 2 for comment number 54.</p>	
81.	<p><u>Page F6-1.</u> <u>Comment:</u> The inspection checklist must be expanded.</p> <p><u>Requirement.</u> Refer to the 616 NRDWSF Part B Permit Application, Revision 2, for guidance. In addition, it will be necessary to create a checklist that includes all of the equipment listed in the contingency plan. This checklist will become a part of the weekly inspection checklist. This equipment must be individually inspected and documented by type, and be in adequate condition, and in the quantities listed.</p>	

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	DOE-RL/WHC Response: Refer to disposition number 72.	
	<u>Ecology Comment:</u> The inspection checklist for the Central Waste Complex must be consistent with the 616 NRDWSF permit application.	
	DOE-RL/WHC Response 2: The inspection checklist for the HCWC-RMW Storage Facilities will be expanded to a level comparable to the checklist used in the 616 NRDWSF Permit.	
82.	<p><u>Page 7-1, line 4. Comment:</u> This section states that the WAC 173-303 requirements are "satisfied" in the documents listed. It is presumptuous to say that the requirements are met in these documents prior to approval by Ecology.</p> <p><u>Requirement.</u> Change the word "satisfied" to "addressed."se</p> <p>DOE-RL/WHC Response: This text is verbatim from the 616 NRDWSF Dangerous Waste Permit Application, which has been accepted by Ecology.</p>	03/12/93
83.	<p><u>Page 7-1, line 11. Comment:</u> Any changes to the Building Emergency Plan should be cleared with Ecology before it is assumed that Ecology will have no interest or authority over the sections revised. In addition, the BEP will be an enforceable part of the permit, and as such will be subject to the modification requirements of WAC 173-303-830.</p> <p><u>Requirement.</u> The wording in this section must be modified to affirm the above.</p> <p>DOE-RL/WHC Response: Ecology is correct in requiring the Building Emergency Plan for the Central Waste Complex be subject to the requirements of WAC 173-303-830; however, on Page 7-1, Lines 11 through 16 indicate that revisions made to portion(s) of the contingency plan documents that are not governed by the requirements of WAC 173-303 [Occupational Safety and Health Administration (29 CFR 1910) and U.S. Department of Energy Orders], will not be considered as a modification for review or approval by Ecology.</p> <p>Current text is appropriate.</p>	03/12/93

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84.	<p><u>Section 7A, all.</u> <u>Comment:</u> This section is difficult to reference since there are no line numbers.</p> <p><u>Requirement.</u> Add line numbers to appendix 7A and any other sections of the permit, other than figures, that are not currently line numbered.</p> <p>DOE-RL/WHC Response: Line numbers are not a standard format for Building Emergency Plans. Text will remain unmodified.</p>	03/12/93
85.	<p><u>Page 7A-2.</u> <u>Comment:</u> Much of the information included in section 1.4 could be moved to the facility description section of the permit application (chapter 2.0). There are details in this section that are important to include in the permit application, but the facility description for the contingency plan does not need to be this lengthy.</p> <p><u>Requirement.</u> Condense the facility description in the BEP, and move the remaining information to chapter 2.0.</p> <p>DOE-RL/WHC Response: This section has been condensed in the latest revision of the Building Emergency Plan. Refer to attached Building Emergency Plan for the Central Waste Complex.</p>	03/12/93
86.	<p><u>Page 7A-3/figure.</u> <u>Comment:</u> What are, or were, the protective barrier test facilities shown on this figure?</p> <p><u>Requirement.</u> Please describe these facilities and state their current status and relation to the RMW. This figure may need to be revised.</p> <p>DOE-RL/WHC Response: The referenced drawing has been replaced with an updated version. Refer to the attached Building Emergency Plan for the Central Waste Complex.</p>	03/12/93

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87.	<p><u>Page 7A-4/figure.</u> <u>Comment:</u> The figure on this page is all but illegible.</p> <p><u>Requirement.</u> Enlarge this figure to make it legible. It may be more appropriate to make this into two pages.</p> <p>DOE-RL/WHC Response: The referenced drawing has been revised with an updated version. Refer to attached Building Emergency Plan for the Central Waste Complex.</p> <p><u>Ecology Comment:</u> The revised version of the Building Emergency Plan displays a totally different drawing than that indicated in the original version. Was the original drawing deleted?</p> <p>DOE-RL/WHC Response 2: The original drawing has been replaced. The updated drawing accurately reflects the current configuration of the RMW Storage Facility.</p>	
88.	<p><u>Page 7A-6.</u> <u>Comment:</u> Under the heading toxic, it is mentioned that PCBs may also be stored in the 2402 series buildings.</p> <p><u>Requirement.</u> Do the 2402 series buildings meet the TSCA requirements for PCB storage? Any description of how they meet the standards must be included in chapter 2.0.</p> <p>DOE-RL/WHC Response: Refer to disposition number 38.</p>	03/12/93
89.	<p><u>Page 7A-16, figure.</u> <u>Comment:</u> Judging from the wind rose provided for this area, it is very likely that a plume emitted from a fire/explosion/release at the RMW could endanger both staging areas (i.e., the wind often blows out of the NW). If the main staging area is at 272-WA, a better alternate would be north of the facility near 23rd street.</p> <p><u>Requirement.</u> Re-evaluate the location of the staging areas and determine the appropriate main and alternate locations.</p> <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 may direct evacuation and assembly as the situation warrants.</p>	03/12/93

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90.	<p><u>Page 7A-18.</u> <u>Comment:</u> This section does not "provide a generalized idea of the types and amounts of hazardous materials and wastes stored in the CWC. On the contrary, this section refers the reader to the following sections (3.0.1 and 3.0.2) which refer the reader to section 3.0.</p> <p><u>Requirement.</u> These sections must be revised to show more clearly what types of wastes may be encountered during a contingency/emergency event at the RMW. How will the BED know what type of waste is involved in an emergency event?</p> <p>DOE-RL/WHC Response: This format problem has been corrected in the current version of the Building Emergency Plan for the Central Waste Complex. Refer to attached Building Emergency Plan for the Central Waste Complex. Refer to disposition number 91 for response on types of hazards.</p>	03/12/93
91.	<p><u>Page 7A-18.</u> <u>Comment:</u> Once again the text states that the BED will have access to "detailed information acquired in determining the material involved", but does not state what the source of the information is. Apparently a lot of the information is going to come from the list of possible materials involved, but these lists will be very large, and where the specific waste has been stored will not be provided with sufficient accuracy. The other possibility is that the information will be retrieved from the drums themselves, which may be impossible for some spills, and certainly for fires or explosions.</p>	

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	<p><u>Requirement.</u> See the previous requirement.</p> <p>DOE-RL/WHC Response: The types of waste might be specified to a point, but the types of waste change constantly with shipments. While individual structures are designed and labeled as to what waste types (refer to disposition number 54) the structures contain (refer to figures in attached Building Emergency Plan for the Central Waste Complex), the building emergency director's best source for delineating actual substances and amounts is the shipping manifests for offsite shipments or waste tracking forms for waste moved onsite.</p> <p>Ecology Comment: The manifests will contain the type of waste which is received at the site, but where will the information be kept on the specific area where these wastes are stored? Is there a log book or computer system which will furnish this information? This information must be easily accessed in case of an emergency situation.</p> <p>DOE-RL/WHC Response 2: The 'cradle-to-grave' tracking required for waste is maintained by WHC on the computerized Solid Waste Information Tracking System (SWITS). This gives the Building Emergency Director ready access to all available information about the contents and location of the waste packages.</p>	
92.	<p><u>Page 7A-19. Comment:</u> Sampling may be necessary for releases other than to soils.</p> <p><u>Requirement.</u> Expand the possible range of items that may be sampled with the sampling plan to include matrices for groundwater, surface water, and air, the waste management equipment.</p> <p>DOE-RL/WHC Response: Sampling methods will be listed in the next revision of the Building Emergency Plan for the Central Waste Complex. Currently, sampling is conducted in accordance with WAC 173-303-110, "Sampling and Testing Methods," and SW-846, "Test Methods for the Evaluation of Solid Waste, Physical/Chemical Methods." Refer to Chapter 3.0 of the HCWC-RMW Storage Facility Dangerous Waste Permit Application.</p>	

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	<p>Ecology Comment: Methods for aqueous samples must be included in the revision to the Building Emergency Plan.</p> <p>DOE-RL/WHC Response 2: If the need arises to perform aqueous samples, the appropriate approved methodology will be determined. The Building Emergency Plan for the Central Waste Complex will be modified to address this.</p>	
93.	<p><u>Page 7A-19.</u> Comment: The isolation and stabilization is a proper step, but the details need to be added.</p> <p>Requirement. Add the details on how the contaminated area will be isolated and contained. Also, include measures to address groundwater and surface water.</p> <p>DOE-RL/WHC Response: Text will be modified in accordance with WAC 173-303 when the Building Emergency Plan for the Central Waste Complex is revised.</p>	03/12/93
94.	<p><u>Page 7A-19.</u> Comment: The sampling and analyses, in addition to following the criteria for the methods used, must adhere to the Facility-wide quality assurance/quality control requirements listed in the Draft Hanford Permit.</p> <p>Requirement. All sampling and analyses done under this permit application will be done in accordance with the above.</p>	

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DOE-RL/WHC Response: (Hanford Facility Permit comment II.E.) In the instance of the Hanford Facility Quality Assurance/Quality Control (QA/QC) Plan, Ecology has taken a management tool provided as an example of the DOE-RL's commitment to QA and converted it to a costly and inefficient Permit document bound to the modification process under WAC 173-303-830. The QA/QC Plan relates not only to the individual final status TSD units, but to a variety of operations. This plan goes beyond any regulatory requirements that may be related to its provisions, but in a generic manner. As a management tool, it is subject to numerous, even continuous changes to ensure its relevancy and responsiveness to QA/QC imperatives which, when unrelated to the regulatory compliance issues, should be not be subjected to the permit modification process. Additionally, the changes proposed in the following section are ambiguous and confusing at best when read as permit conditions. The commenters attempt to provide Ecology with the fullest possible disclosure has been put to an unforeseen and inappropriate use.

In addition, there is no regulatory basis to require a QA/QC Plan as a permit condition or attachment. Specifically, there is no specific reference to a QA/QC document in WAC 173-303-300, -395, -600, -806, or -810. There being no regulations specifying a QA/QC document or its contents, any attempt to incorporate such a plan into a final status permit or comment on or change an internal management tool is beyond the scope of appropriate regulatory action. The plan changes made by the conditions are subjective and argumentative. A QA/QC plan as a guidance document is a dynamic management tool subject to frequent or immediate modification in response to various indications of a need to ensure that quality operations and processes are continuously conducted. The addition or treatment of a comprehensive guidance document like the QA/QC plan in point, commits the document to an extraordinary and time consuming process when changes are required that do nothing to add to the protection of human health and the environment. A QA/QC plan does not regularly appear as an attachment in other permits previously issued in EPA Region 10.

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The individual changes made within this condition are also subjective and without regulatory basis. The changes are unsubstantiated in that the Fact Sheet submitted with the Draft Permit is required to provide justification for each condition within a permit. Not only were none provided, the Fact Sheet misrepresents that the QA/QC "...plan is intended to set the basic requirements that all areas of the Hanford Facility will meet...". The document actually states it will "...set forth the minimum requirements for TSD units for which a final facility status permit has been, or will be, sought." The Fact Sheet also inaccurately states that the Plan did not fully comply with the regulations when there are no regulations governing such a document. The plan document was included in the permit application to demonstrate that a QA/QC program is in place at the Hanford Facility to ensure the hazardous and dangerous waste management activities to be covered under the Permit met appropriate QA/QC requirements. The commonality of various TSD units does not equate to equal application of all QA/QC guidelines. As a result, individual TSD units and projects have or will have QA/QC plans of their own. No rationale or objective basis has been provided to support making the modifications set forth in the Permit conditions upon which enforcement actions may be taken applicable to this type of document.

The subjectivity of the conditions reflect more of an individual writing style toward a quality assurance plan rather than objective identification of any actual deficiencies related to a regulatory requirement. The Permit should not be burdened with subjective or editorial type comments as conditions. Such actions are neither efficient nor cost effective. The complexity of the Hanford Facility makes this permit an extraordinarily complex document that is adversely impacted by including the QA/QC plan and the changes required by this section of the permit as conditions.

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Many of the conditions are erroneous because they impose specific program guidance, such as the Contractor Laboratory Program (CLP) and SW-846, as mandatory conditions for programs not covered by those documents. A variety of projects are covered by this plan, the majority of which do not require either CLP or SW-846. Putting SW-846 in as a mandatory requirement is improper in itself. It is a guidance document that has been ruled to have no binding effect and is open to attack in any particular case. Citing such specific requirements is more appropriately left to individual TSD units or project requirement. In fact, the FFACO specifies that QA/QC for samples be in accordance with the Data Quality Objectives (DQO) for each sample, which is conclusive evidence of the fact that QA/QC requirements are project specific. Furthermore, Ecology, EPA and the DOE-RL have been working on a more comprehensive "Data Quality Strategy for Hanford Site Characterization" that will be more project specific, and will be a more appropriate document to ensure regulatory compliance.

Ecology Comment: The QA/QC plan in the Permit is consistent with EPA documents which are currently in existence. If RL is in compliance with all EPA QA/QC requirements as specified for methods used, there should be no problem with RL to comply with the QA/QC plan as stated. The QA/QC plan refers only to sampling and analyses operations. The QA/QC specified in the permit are basic analytical procedures. These procedures are normally performed, and the permit requires that these procedures be documented. The reason for documentation is so that Ecology can perform a data validation on data packages coming from laboratories to ensure compliance to EPA protocols. RL must comply with the Site-Wide Permit Dated January 15, 1992 on all QA/QC requirements.

DOE-RL/WHC Response 2: There is currently no Hanford Facility Permit to follow. Disposition of this comment is dependant upon resolution of this Hanford Facility issue.

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95.	<p><u>Page 7A-20.</u> <u>Comment:</u> Ecology is the agency authorized to determine the appropriate cleanup measures for releases from the RMW.</p> <p><u>Requirement.</u> State that Ecology must approve any cleanup activity taken pursuant to a release from the RMW.</p> <p>DOE-RL/WHC Response: This information is contained in Appendix B Contingency Plan, of the Building Emergency Plan for the Central Waste Complex. Refer to the attached Building Emergency Plan for the Central Waste Complex.</p>	03/12/93
96.	<p><u>Page 7A-22.</u> <u>Comment:</u> Seismic events may also lead to loss of integrity of secondary containment, and loss of electrical service to the RMW.</p> <p><u>Requirement.</u> Add these possibilities to subsection 3.3.1.</p> <p>DOE-RL/WHC Response: Text will be modified when the Building Emergency Plan for the Central Waste Complex is revised.</p>	03/12/93
97.	<p><u>Page 7A-22.</u> <u>Comment:</u> Volcanic events may also lead to deposits in secondary containment that may reduce or eliminate the containment volumes.</p> <p><u>Requirement.</u> Add these possibilities to subsection 3.3.2.</p> <p>DOE-RL/WHC Response: Text will be modified when the Building Emergency Plan for the Central Waste Complex is revised.</p>	03/12/93
98.	<p><u>Page 7A-22.</u> <u>Comment:</u> The lfp modules are "resilient" to winds up to 100 miles per hour, but not mention is made of the possibility of overturned drums.</p> <p><u>Requirement.</u> At what wind speeds is it likely the LFP modules would move enough to cause the drums within to overturn?</p>	03/12/93

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	<p>DOE-RL/WHC Response: The probability of the Low-Flash-Point Mixed Waste Storage Modules overturning in a wind storm is highly unlikely because the modules are staked to the ground and tied down with wire cable, which prevents the Low-Flash-Point Mixed Waste Storage Modules from movement. Therefore, the possibility of a container moving or overturning is highly unlikely.</p>	
99.	<p><u>Page 7A-23.</u> <u>Comment:</u> The definition of hazardous materials is not clear.</p> <p><u>Requirement.</u> It would be helpful to add examples of what is considered hazardous material, since it appears to be more than just dangerous waste and mixed waste, or simply state that hazardous materials is limited to dangerous waste and mixed waste.</p> <p>DOE-RL/WHC Response: Text will be modified to read "radioactive and/or mixed waste" when the Building Emergency Plan for the Central Waste Complex is revised.</p> <p><u>Ecology Comment:</u> The original question stated that the definition of hazardous material was not clear. Please provide a more detailed explanation of hazardous waste.</p> <p>DOE-RL/WHC Response 2: Hazardous wastes are defined as those solid wastes designated by 40 CFR 261, and regulated as hazardous waste by the EPA. Source, special nuclear material, and byproduct materials as defined by the <i>Atomic Energy Act of 1954</i>, as amended, are specifically excluded from the definition of hazardous waste.</p>	
100.	<p><u>Page 7A-24.</u> <u>Comment:</u> Subsection 3.4.5 shows no thermal hazards or reactions apply to the RMW. What about water reactive wastes? It is not possible that water from the sprinkler system could react with a spill of water reactive wastes, which often generate heat?</p> <p><u>Requirement.</u> State whether the above scenario is possible and what precautions and emergency measures are in place to respond to it. If it is not possible, state what preventive measures are in place to prohibit it.</p>	03/12/93

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	<p>DOE-RL/WHC Response: Water reactive waste currently is not stored at the RMW Storage Facility; however, this waste is scheduled to be stored in safety storage modules in the near future. These safety storage modules will not be equipped with a water sprinkler system. Firefighting equipment (e.g., sodium extinguisher) for alkali metals (e.g., sodium) will be obtained before reactive waste is stored in the safety storage modules at the RMW Storage Facility. Refer to disposition number 70.</p>	
101.	<p><u>Page 7A-24. Comment:</u> Potential liquid hazards are not addressed at all in section 3.4.6.</p> <p><u>Requirement.</u> There are more possible hazards in regard to liquid chemical fires, and liquid hazards in general, then are listed here. Expand this section to consider more of the potential problems associated with liquid fires and releases.</p> <p>DOE-RL/WHC Response: Liquid waste stored at the RMW Storage Facility could include containers with lab packs (e.g., vials of liquids packaged with solids) or containers containing solvent-soaked rags that are packed with absorbent material. Text will be modified when the Building Emergency Plan for the Central Waste Complex is revised.</p>	03/12/93
102.	<p><u>Page 7A-25. Comment:</u> The compactor exhaust fans are mentioned in subsection 3.5.1.</p> <p><u>Requirement.</u> Where are the compactor exhaust fans located, and are they considered a part of the RMW operations? What type of releases are possible from these fans? Be as detailed as possible.</p> <p>DOE-RL/WHC Response: The 213-W Dry Waste Compactor has been deleted from the current Building Emergency Plan for the Central Waste Complex. Refer to the attached Building Emergency Plan for the Central Waste Complex.</p>	03/12/93
103.	<p><u>Page 7A-26. Comment:</u> Incidents that are required to be reported under the WAC 173-303-360 reporting requirements are defined in the Draft Hanford Permit. This defines when Ecology considered the contingency plan to have been implemented.</p> <p><u>Requirement.</u> The FMW will comply with the reporting requirements of the Draft Hanford Permit in regard to the definition of contingency plan implementation.</p>	03/12/93

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	<p>DOE-RL/WHC Response: (Hanford Facility Permit comment II.A.2.d) This comment arbitrarily defines how and what incidents will be deemed emergencies for purposes of deciding whether to implement the contingency plan. The emergency coordinator responding to an incident must determine whether an emergency is in progress based on the specific scenario. Compliance with WAC 173-303-360(2)(k) can be accomplished by incorporating the proposed language in the comment to Draft Permit condition II.A.1. The condition as drafted establishes a gauge for incident classification based on the level of protection used by personnel. This approach ignores WAC 173-303-350, which states that the contingency plan is for <i>use in emergencies or sudden or nonsudden releases which threaten the public health and the environment</i>. Compliance with this condition will result in management inefficiency and will undermine the intent of the contingency plan. Spills are often mitigated and cleaned up in protective clothing as a standard precaution. Other permits issued by the Department are void of the arbitrary designations found in this condition [Texaco, WAD009276197, Condition II.I.4; Shell, WAD009275082, Condition II.I.4].</p>	
104.	<p><u>Page 7A-27.</u> <u>Comment:</u> The HAZMAT team will do the sampling for unknown hazardous wastes.</p> <p><u>Requirement.</u> Is the HAZMAT team trained and familiar with the required sampling and analysis procedures? Explain the training undertaken by the HAZMAT team members to ensure knowledge of the proper sampling and analyses protocols.</p> <p>DOE-RL/WHC Response: While the Hanford Fire Department HAZMAT team is trained to do sampling for dangerous waste only, the HAZMAT team does not sample radioactive and/or mixed waste spills at the RMW Storage Facility. The details regarding training and qualifications are not appropriate for inclusion in the Building Emergency Plan for the Central Waste Complex. The HCWC-RMW Storage Facility Dangerous Waste Permit Application Chapter 8.0 (Personnel Training) addresses personnel training.</p>	03/12/93

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105.	<p><u>Page 7A-27.</u> <u>Comment:</u> Allowable exposures for hazardous materials are not included in this section. These exposures must follow Occupational Safety and Health Administration (OSHA) guidelines. If there are no established limits set under OSHA, then limits set by the American Conference of Governmental Industrial Hygienists (ACGIH) will be followed.</p> <p><u>Requirement.</u> Add information to this section that addresses exposures to hazardous materials, and reflects the above requirements.</p> <p>DOE-RL/WHC Response: This information is available in the office support area (272-WA Building) for the RMW Storage Facility. This information could include "Material Safety Data Sheets" for materials currently stored at the RMW Storage Facility.</p>	03/12/93
106.	<p><u>Page 7A-27.</u> <u>Comment:</u> Section 5.1, Building Emergency Organization, refers the reader to Appendix A, which refers the reader to the Facility-wide permit application, which refers to the DOE/RL emergency plan. None of these documents contain the names of the emergency coordinator or the alternates.</p> <p><u>Requirement.</u> The current names and numbers of the emergency coordinator and the alternates, at a minimum, must be submitted to the Occurrence Notification Center and Ecology. As agreed to in the facility-wide permit meetings, these names and numbers do not need to be included in the permit for the RMW.</p> <p>DOE-RL/WHC Response: Text will remain unmodified.</p> <p>Ecology Comment: Although the text will remain unmodified, the names of the emergency coordinator and the alternates must be submitted to the Occurrence Notification Center and Ecology.</p> <p>DOE-RL/WHC Response 2: Disposition of this comment is dependant upon resolution of this Hanford Facility issue.</p>	

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107.	<p><u>Page 7A-28.</u> <u>Comment:</u> Are there any fire-fighting capabilities for alkali metals at the RMW?</p> <p><u>Requirement.</u> State whether alkali metal fire response is available at the RMW, or that no alkali metals are stored at RMW.</p> <p>DOE-RL/WHC Response: Refer to disposition numbers 70 and 100.</p>	03/12/93
108.	<p><u>Page 7A-29.</u> <u>Comment:</u> The table on this page is incorrectly formatted.</p> <p><u>Requirement.</u> Review the table and make the necessary corrections.</p> <p>DOE-RL/WHC Response: The text has been revised. Refer to the attached Building Emergency Plan for the Central Waste Complex.</p>	03/12/93
109.	<p><u>Page 7A-30.</u> <u>Comment:</u> The use of a Public Address system is mentioned. Is the PA available and working at all of the buildings, considering the construction activities taking place at the RMW?</p> <p><u>Requirement.</u> State which areas are accessed by the public address system and which areas are currently working.</p> <p>DOE-RL/WHC Response: The public address system for the RMW Storage Facility is located in the 2403-WA Radioactive and/or Mixed Waste Storage Building and is fully functional and maintained as such. Also, there is a public address system in the 272-WA Building. Portable radios and word-of-mouth provide communication when the public address system is not available. There also is a telephone in the 2403-WA Radioactive and/or Mixed Waste Storage Building and at both Staging Areas.</p>	03/12/93
110.	<p><u>Page 7A-30.</u> <u>Comment:</u> See the previous comments on the absence of names in appendix A. The note that follows this states that if the BED cannot be reached, appropriate emergency response personnel will be contacted.</p> <p><u>Requirement.</u> Explain how DOE/WHC propose to meet the requirements of WAC 173-303-360(1) if there are occasions when the BED cannot be reached.</p>	

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	DOE-RL/WHC Response: Refer to disposition number 106.	
	<u>Ecology Comment</u> : Refer to comment 106.	
	DOE-RL/WHC Response 2: Disposition of this comment is dependant upon resolution of this Hanford Facility issue.	
111.	<p><u>Page 7A-30. Comment</u>: The use of portable radios once again appears to be the primary means for communicating with field personnel.</p> <p><u>Requirement</u>. The use of portable radios must be explained more fully. The previous comments on portable radios and communications. Do employees always carry portable radios when working alone at the RMW or are otherwise out of the immediate vicinity of a communications device? See the requirements in WAC 173-303-340(2).</p> <p>DOE-RL/WHC Response: All Nuclear Process Operators working in the RMW Storage Facility structures either carry two-way portable radios or are in voice communication with someone who has a two-way radio. Also, refer to disposition number 109.</p>	03/12/93
112.	<p><u>Page 7A-31. Comment</u>: The notification requirements of WAC 173-303-360 are not fulfilled by this section.</p> <p><u>Requirement</u>. This section must be expanded to address WAC 173-303-360 reporting requirements. If the necessary information is in another part of the contingency plan, it should be referenced here.</p> <p>DOE-RL/WHC Response: This information is addressed in the HCWC-RMW Storage Facility Dangerous Waste Permit Application, Chapter 2.0, Section 2.7.</p>	03/12/93
113.	<p><u>Page 7A-31. Comment</u>: Table 5.4.1 is incorrectly formatted. Also in the first response action their is a recommendation for employees to get their car keys if time permits. Leaving a decision like this open to the individuals discretion may cause considerable confusion during an evacuation. Someone in the emergency organization with specific knowledge should make the decision whether it is safe to take the time to retrieve keys.</p>	03/12/93

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	<p><u>Requirement.</u> Correct the format in Table 5.4.1 and consider the appropriateness of having individuals make the decision of how quickly to evacuate the area. Also, how will the BED direct personnel not to evacuate with the fire gong going off?</p> <p>DOE-RL/WHC Response: Text has been revised. Refer to the attached Building Emergency Plan for the Central Waste Complex.</p> <p>Response actions will be as conditions dictate. Because there are no evacuation buses, vans, and trucks, private vehicles will provide the evacuation transportation.</p> <p>Text will be modified regarding the evacuation when a fire alarm is sounded when the Building Emergency Plan for the Central Waste Complex is revised.</p>	
114.	<p><u>Page 7A-32.</u> <u>Comment:</u> Is the PAX system only in the 272-WA building? If so it does not meet the requirements of WAC 173-303-340.</p> <p><u>Requirement.</u> State the areas that are covered by the PAX system, and if they do not cover the entire RMW, what other system is in place to fulfill WAC 173-303-340.</p> <p>DOE-RL/WHC Response: Refer to disposition number 109.</p>	03/12/93
115.	<p><u>Page 7A-33.</u> <u>Comment:</u> See the previous comments on the PA system and the staging areas (comment numbers 112 and 87 respectively).</p> <p><u>Requirement.</u> See above.</p> <p>DOE-RL/WHC Response: Refer to disposition number 109.</p>	03/12/93
116.	<p><u>Page 7A-33.</u> <u>Comment:</u> The 272-WA area will be notified by the crash alarm system of a hostile attack. How will the RMW personnel be notified of this event?</p> <p><u>Requirement.</u> state how the RMW will be notified of this event. Will the RMW be connected to the crash phone system in the near future?</p>	03/12/93

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	DOE-RL/WHC Response: In the event of a Crash Alarm Telephone System notification requiring personnel response, personnel in the 272-WA Building will use radios, telephones, public address system, or word-of-mouth to notify personnel in the RMW Storage Facility.	
117.	<p><u>Page 7A-40.</u> <u>Comment:</u> The description of the process to turn the sprinkler system off at the 2403-WA building is incomplete.</p> <p><u>Requirement.</u> Complete the description.</p> <p>DOE-RL/WHC Response: Text will be modified to include instructions to place the appropriate post-indicator valve to the OFF position when the Building Emergency Plan for the Central Waste Complex is revised.</p>	03/12/93
118.	<p><u>Page 7A-46.</u> <u>Comment:</u> The spill response plan is lacking in detail. For Example, the description of the actions to be taken for a spill are: "If response is within the capabilities of the Building Emergency Response Organization, actions appropriate for the waste or material involved shall be initiated to contain and control the release."</p> <p><u>Requirement.</u> This section must be expanded. The primary emergency potential at the RMW is a spill or release of mixed waste. The specific actions to be taken in the event of a spill must be listed here, including identification, containment, stabilization, isolation, and cleanup of spilled wastes. The various categories of waste must have the actions to be taken outlined. For example, the response to acids is not necessarily the same response as used for flammables.</p> <p>DOE-RL/WHC Response: Text will be modified when the Building Emergency Plan for the Central Waste Complex is revised.</p>	03/12/93
119.	<p><u>Page 7A-49.</u> <u>Comment:</u> In subsection 6.5.3.2, part 1, the word "areal" must be placed before the word "extent".</p> <p><u>Requirement.</u> Make the word change. The new sentence must now state: "...and areal extent...".</p> <p>DOE-RL/WHC Response: Text will be modified when the Building Emergency Plan for the Central Waste Complex is revised.</p>	03/12/93

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120.	<p><u>Page 7A-49.</u> <u>Comment:</u> Subsection 6.5.3.2, part 2, the acronym SWSDR is used without a definition.</p> <p><u>Requirement.</u> Please include a definition for SWSDR in this section.</p> <p>DOE-RL/WHC Response: This acronym (SWSDR) will be deleted and replaced with "waste tracking forms" when the Building Emergency Plan for the Central Waste Complex is revised.</p>	03/12/93
121.	<p><u>Page 7A-49.</u> <u>Comment:</u> Subsection 6.5.3.2, part 8, the word "release" must be changed to "released".</p> <p><u>Requirement.</u> Make the appropriate change.</p> <p>DOE-RL/WHC Response: Text will be modified when the Building Emergency Plan for the Central Waste Complex is revised.</p>	03/12/93
122.	<p><u>Page 7A-50.</u> <u>Comment:</u> The stabilization of asbestos is not explained.</p> <p><u>Requirement.</u> Include the details on the process for stabilizing asbestos releases.</p> <p>DOE-RL/WHC Response: Asbestos is only a potential hazard if it is included in any of the waste containers. This information is included in the current Building Emergency Plan for the Central Waste Complex. Refer to attached Building Emergency Plan for the Central Waste Complex.</p>	03/12/93
123.	<p><u>Page 7A-51.</u> <u>Comment:</u> The primary problem with this section is the lag time between the initial release and the evacuation of the area. Although the affected area is evacuated immediately, the rest of the area is not evacuated until after a considerable time delay. Why?</p> <p><u>Requirement.</u> Please explain the rationale for this response delay.</p> <p>DOE-RL/WHC Response: Evacuation is not advisable until the direction of a plume is determined by the Building Emergency Director. Area evacuation might not be necessary in response to a spill or release. This determination is assessed by the Building Emergency Director.</p>	03/12/93

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124.	<p><u>Page 7A-52. Comment:</u> Once again there is the delay between the near vicinity evacuation and the area evacuation. Also, how can personnel get one barrier away from the CAM in the lfp module area?</p> <p><u>Requirement.</u> Provide the direction to personnel encountering a CAM going off in the lfp module area. State how they are to respond.</p> <p>DOE-RL/WHC Response: Refer to disposition number 123 for response to first portion of the comment. Refer to disposition number 3 regarding the use of a continuous air monitor systems. Continuous air monitor systems in the Low-Flash-Point Mixed Waste Storage Modules have been considered unnecessary and will be removed in the near future.</p> <p><u>Ecology Comment:</u> It is unreasonable to expect someone to hold their breath while running to an area which is one barrier away from the affected area of a release. If personnel are in an area where the potential exists for a release of hazardous material, protective gear such as face masks with respirators, should be carried at all times. This will ensure some type of protection in the event of a release, and if the nearest barrier is .25 mile or more away, personnel involved will have a better chance of escape.</p> <p>DOE-RL/WHC Response 2: Refer to DOE-RL/WHC Response 2 for comment number 3 regarding the use of a continuous air monitor systems supporting activities strictly related to radionuclides. All continuous air monitor systems have been considered unnecessary and have been removed from all storage structures at the RMW Storage Facility. However, if an employee should discover a spill or an off-normal situation where the structural integrity of a radioactive and/or mixed waste container is in question, the employee will vacate the area immediately and report the situation. Actions to resolve the situation will then be initiated.</p>	
125.	<p><u>Page 7A-54. Comment:</u> Section 8.0. The cleaning of emergency equipment must be accomplished prior to resuming operations at the RMW. Ecology must also be notified of the completion of the cleanup prior to the restart of operations.</p> <p><u>Requirement.</u> Add text to this section affirming the above.</p>	03/12/93

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	<p>DOE-RL/WHC Response: These items are addressed appropriately in the current Building Emergency Plan for the Central Waste Complex. Refer to the attached Building Emergency Plan for the Central Waste Complex. Ecology is required to be notified only when the RMW Storage Facility is shut down in response to emergency conditions. Minor spills and the resultant cleanup and return to normal operations are permitted without approval from Ecology.</p>	
126.	<p><u>Page 7A-54.</u> <u>Comment:</u> Section 9.0. The word "should" must be changed to "shall" throughout this section.</p> <p><u>Requirement.</u> Make the appropriate word changes.</p> <p>DOE-RL/WHC Response: Text will be modified when the Building Emergency Plan for the Central Waste Complex is revised.</p>	03/12/93
127.	<p><u>Page 7A-56, appendices.</u> <u>Comment:</u> The names and numbers of the emergency response organization have not been provided with the permit application referenced.</p> <p><u>Requirement.</u> These names and numbers must be provided to Ecology and kept at the Occurrence Notification Center, in accordance with agreements made during the facility-wide permit meetings.</p> <p>DOE-RL/WHC Response: Refer to disposition number 106.</p> <p><u>Ecology Comment:</u> Refer to comment 106.</p> <p>DOE-RL/WHC Response 2: Disposition of this comment is dependant upon resolution of this Hanford Facility issue.</p>	
128.	<p><u>Page 7A-58.</u> <u>Comment:</u> Section B.5.1. How are the alternate BEDs notified that they are responsible for emergency events? Are they rotated in regular shifts, or are they notified by the BED prior to assuming responsibility?</p> <p><u>Requirement.</u> Please state in this section how the alternates are notified of the transfer of authority.</p>	03/12/93

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<p>DOE-RL/WHC Response: The Building Emergency Director and alternates are the managers and supervisors of the HCWC-RMW Storage Facility. If the Building Emergency Director is not within the 200 Area, one of the alternates will be in charge in the event of an emergency by virtue of the fact that the alternate(s) are in charge of the HCWC-RMW Storage Facility in the BED's absence. When the HCWC-RMW Storage Facility is not operating (e.g., holidays, weekends, etc.), notification is made through the Occurrence Notification Center using the Emergency Assignment Roster and phone lists that are updated quarterly.</p>	03/12/93	
<p>129. <u>Page 7A-58.</u> <u>Comment:</u> Section B.5.3. See the previous comments on the receipt of off-site waste and the waste analysis plan. The response to damaged waste shipments that cannot be transported, pursuant to WAC 173-303-350(3)(b) and -370(5), is inadequate. This section must contain all the information necessary to respond to the potential problems regarding damaged waste shipments. For example, there is no mention made of where the over-packing activities will take place, or what protective clothing may be used by the personnel performing the work, whether sorbents may be used, and how the problem of seriously damaged drums that cannot be over-packed will be resolved.</p>	03/12/93	
<p><u>Requirement.</u> Expand this section to address the details of the response activities associated with damaged shipments. Referencing to other sections is sufficient, provided the referenced sections contain the information required.</p>		
<p>DOE-RL/WHC Response: Damaged shipment information will be included when the Building Emergency Plan for the Central Waste Complex is revised.</p>		
<p>130. <u>Page 7A-59.</u> <u>Comment:</u> The distribution of the BEP is discussed.</p>	03/12/93	
<p><u>Requirement.</u> Please provide a list of the organizations that have received a copy of this BEP and are expected to respond when necessary to emergencies at the RMW.</p>		
<p>DOE-RL/WHC Response: Any organization(s) who has to respond to an emergency at the RMW Storage Facility is identified in the Building Emergency Plan for the Central Waste Complex. Ecology's request for a list of organizations that have a copy of the Building Emergency Plan for the Central Waste Complex is not necessary to regulate this unit.</p>		

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131.	<p><u>Page 7A-60.</u> <u>Comment:</u> The first paragraph on this page says that the BED will identify the "...amount, and real extent of any released materials."</p> <p><u>Requirement.</u> Change the word "real" to "areal".</p> <p>DOE-RL/WHC Response: Text will be modified when the Building Emergency Plan for the Central Waste Complex is revised.</p>	03/12/93
132.	<p><u>Page 7A-60.</u> <u>Comment:</u> The third paragraph states that if the facility has had a "...release, fire, or explosion that could threaten human health or the environment outside the facility, ...". The WAC 173-303-360 does not limit this response to threats outside the facility.</p> <p><u>Requirement.</u> Delete the words "outside the facility" from this sentence. Emergency responses, including this section, will be implemented for conditions that threaten human health and the environment whether within the facility or outside of it.</p> <p>DOE-RL/WHC Response: Text will be modified when the Building Emergency Plan for the Central Waste Complex is revised.</p>	03/12/93
133.	<p><u>Page 7A-60.</u> <u>Comment:</u> Those events that Ecology considers as having required implementation of the contingency plan are listed in the Draft Hanford Permit. This clearly defines those events that must be reported under WAC 173-303-360(2)(k).</p> <p><u>Requirement.</u> Make a reference in this section to the reporting requirements within the Draft Hanford Permit regarding the written reporting requirements of WAC 173-303-360(2)(k).</p> <p>DOE-RL/WHC Response: Refer to disposition number 103.</p>	03/12/93

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134.	<p><u>Page 8-34, line 12.</u> <u>Comment:</u> This section states that training records must be handled in accordance with the Privacy Act of 1976.</p> <p><u>Requirement.</u> Ecology is mandated to handle records which qualify for protected status under the Privacy Act in accordance with that act, as it applies to the Resource Conservation and Recovery Act, section 3007, and 70.105.RCW and WAC 173-303-810(15). It is not appropriate for the permittees to attempt to regulate Ecology through a permit application. This section must be deleted.</p> <p>DOE-RL/WHC Response: (Hanford Facility Permit comment II.C.2.b.) The RL and WHC recognize that regulators have a valid need for access to training records. Notwithstanding that, training records are listed within the DOE's "systems of records" required under the <i>Privacy Act of 1974</i>. As such, Ecology and the EPA are required to acknowledge and respect the DOE's responsibilities under that law as well. Access will not be withheld and such records may be copied, if necessary, to meet regulatory requirements once compliance with the <i>Privacy Act</i> is met.</p>	03/12/93
135.	<p><u>Page 10-1, all.</u> <u>Comment:</u> The Waste Minimization Plan should include the information outlined in the June 12, 1989 Notice 54FR 25056 which provided "<u>Draft Guidance to Hazardous Waste Generators on the Elements of a Waste Minimization Program</u>". This was guidance to generators of regulated hazardous waste on what constitutes a "program in place" to comply with the certification requirements of sections 3002(b) and 3005(h) of the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act (RCRA) and the hazardous and Solid Waste Amendments of 1984 (HSWA). This certification requires the generators to implement programs to reduce the volume and the toxicity of hazardous waste to the extent economically practicable. The Waste Minimization Program for the RMW should address the following areas:</p> <ol style="list-style-type: none"> a. Top Management Support: Top Management Support should ensure that waste minimization is a company-wide effort. b. Characterization of Waste Generation: A waste accounting system to track the types, amounts, and hazardous constituents of wastes, and the dates they are generated. 	03/12/93*

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c.	Periodic Waste Minimization Assessments: Materials should be tracked that eventually become waste from the point of receipt at which they become a waste.	
d.	A Cost Allocation System: All managers and departments should be charged "fully-loaded" waste management costs for the wastes they generate, factoring in liability, compliance, and oversight costs.	
e.	Encouragement of Technology Transfer: Technical information should be exchanged on waste minimization from other parts of the facility, from other firms, trade associations, State and university technical assistance programs or professional consultants. Techniques which have been evaluated should be documented.	
f.	Program Evaluation: Conduct periodic reviews of program effectiveness. These reviews will provide feedback and identify potential areas for improvement.	
<p>Additional guidance can be found in "<u>Waste Minimization Opportunity Assessment Manual</u>", EPA/625/7-88/003, dated July 1988, which will assist with the development of a Waste Minimization Plan for the RMW.</p>		
<p><u>Requirement.</u> The Waste Minimization Plan for RMW does not address all the areas outlined in the above guidance and therefore should be revised to be consistent with this guidance as well as the Hanford Federal Facility Waste Minimization Plan. This plan must address the minimization of hazardous waste at the RMW. This Waste minimization assessment is to be included in the Waste Minimization Plan for RMW.</p>		
<p>*DOE-RL/WHC Response: Please note that this response has been revised since submittal of the NOD response table on October 9, 1992. The new response is as follows:</p>		
<p>A certification by the permittee that a waste minimization program is in place will be filed in the Hanford Facility operating record annually.</p>		

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136.	<p><u>Page 11-1, line 5.</u> <u>Comment:</u> This line states that this closure plan is in compliance with WAC 173-303-610. It is up to Ecology to determine whether or not a permit application is in compliance with Chapter 173-303 WAC, and it is presumptuous to make this statement in a permit application.</p> <p><u>Requirement.</u> Delete this line, or modify it to state that this section is <i>intended</i> to meet the requirements of WAC 173-303-610.</p> <p>DOE-RL/WHC Response: To be consistent with the wording of the 616 NRDWSF Dangerous Waste Permit Application, the sentence will be changed to read: "Closure of the RMW Storage Facility will comply with WAC 173-303-610 regulations for the closure of TSD units."</p>	03/12/93
137.	<p><u>Page 11-1, line 10.</u> <u>Comment:</u> This sentence and the sentence beginning on line 12 regarding spills are statements of opinion, not fact.</p> <p><u>Requirement.</u> These lines must either be deleted or modified to reflect that these are goals of the operations at RMW.</p> <p>DOE-RL/WHC Response: The sentence will be revised to read: "Spills and other unusual occurrences are required to be handled promptly and to be well documented." Also, to be consistent with the wording of the 616 NRDWSF Dangerous Waste Permit Application, the following text will be added: "The RMW Storage Facility is not anticipated to become extensively contaminated (the use of the word contaminated refers to contamination by dangerous chemicals regulated by Ecology); therefore, the closure approach will be clean closure."</p> <p><u>Ecology Comment:</u> The sentence on line 10 needs to be deleted. It cannot at this time be determined if the RMW storage facility is a clean, well-maintained storage unit. Ecology agrees with the change to line 12, but delete line 10.</p> <p>DOE-RL/WHC Response 2: The RMW Storage Facility is operated as a clean, well-maintained storage unit. Text will remain unmodified.</p>	

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138.	<p><u>Page 11-1, line 15.</u> <u>Comment:</u> This line must be modified to say that <i>if</i> the clean closure performance standards are met, there will be no post-closure requirements placed on the unit.</p> <p><u>Requirement.</u> Modify the text as necessary.</p> <p>DOE-RL/WHC Response: To be consistent with the terminology of the 616 NRDWSF Dangerous Waste Permit Application, the sentence will be revised to read: "Consistent with the criteria that must be met to clean close a TSD unit, no postclosure activities will be necessary."</p>	03/12/93
139.	<p><u>Page 11-1, line 17.</u> <u>Comment:</u> This section is also presumptuous about achieving clean closure performance standards.</p> <p><u>Requirement.</u> Replace the first use of the word "will" with "must". This sentence will then accurately state: "This chapter describes the performance standards that must be met and closure activities that will be conducted to achieve clean closure."</p> <p>DOE-RL/WHC Response: This sentence is verbatim from the 616 NRDWSF Dangerous Waste Permit Application, which has been accepted by Ecology.</p>	03/12/93
140.	<p><u>Page 11-2, line 14.</u> <u>Comment:</u> Pursuant to the Nuclear and Mixed Waste Management Program's interim policy titled <u>Soil Cleanup/Remediation for Hanford(SCR)</u>, soil will be either cleaned to background levels, meet the standards listed in the policy under option B, or be closed as a landfill. Limiting remediation of the soil to only constituents associated with the RMW is in conflict with the SCR. Any contaminants in the soils around the RMW will be remediated at the time of closure of the RMW, except for spills and releases which must be immediately remediated.</p> <p><u>Requirement.</u> Rewrite the soil closure sections of this chapter to comply with the SCR.</p>	03/12/93

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	<p>DOE-RL/WHC Response: Applying an option from the Soil Cleanup/Remediation for Hanford issued by Ecology to the closure plan would not be appropriate because it is the opinion of DOE-RL and WHC that the Soil Cleanup Policy issued by Ecology technically is flawed (Letter from R. D. Izatt of DOE-RL, to N. Pierce of Ecology, Nuclear and Mixed Waste Management Program Interim Soil Cleanup Policy, dated April 3, 1992). The WAC-173-303-610(2) states clean up levels only for the dangerous waste or residues of the dangerous waste managed at the RMW Storage Facility. Only dangerous waste managed at the RMW Storage Facility or residue of the dangerous waste stored at the RMW Storage Facility will be of concern.</p>	
141.	<p><u>Page 11-4, line 42.</u> <u>Comment:</u> Section 11.1.4.4.1. Ecology has some concerns with the approach of washing the walls prior to sampling and then sampling the wash water for contaminations. This washing will dilute the waste stream, making it difficult to determine the location and concentration of contamination. This is particularly true of the characteristic wastes, specifically caustics. Also, by removing the waste in this manner, the volume of wastes may be increased. For example, if a listed waste is contained in the wash water, the entire volume will be designated as a listed waste. This is inconsistent with waste minimization goals.</p> <p><u>Requirement.</u> It is more appropriate to do authoritative sampling of suspected and potential areas of contamination (known areas of past spills) prior to doing the washing. Review this section and propose an alternative sampling and decontamination program.</p>	

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	<p>DOE-RL/WHC Response: Text will be revised. Section 11.1.4.4.1 will be deleted. Also, the following sentence on Page 11-4, Lines 36 through 37 "Verification of the storage building will involve sampling of the walls and floors" will be deleted.</p> <p>The following text will be added to Section 11.1.4.4: "The walls of the storage buildings are not expected to be contaminated with dangerous waste. Any material spilled in the RMW Storage Facility is removed and verification samples are taken to ensure that no residue remains."</p> <p><u>Ecology Comment:</u> Will sampling the surface of suspected contaminated walls be conducted during the closure process? It cannot be assumed that the walls will not be contaminated. Dependant upon the extent of a possible spill and type of contaminants involved, some analytes may penetrate the walls of the complex. Some sort of sampling plan for these areas must be employed to assure maximum protection of health and the environment and minimum accumulation of waste. The specific procedures for this sampling plan must be submitted for approval by Ecology.</p> <p>DOE-RL/WHC Response 2: Authoritative wipe sampling will be conducted on the walls in areas of suspected contamination only. Sampling locations will be based on process knowledge and the results of radiation surveys and visual inspections.</p> <p>Text will be modified to address authoritative wipe sampling.</p>	
142.	<p><u>Page 11-6, line 32. Comment:</u> Section 11.1.4.5. Soil decontamination must comply with the SCR. In accordance with the SCR, the constituents of concern will not be limited to those from the RMW. <u>Requirement.</u> This section must be revised to reflect the standards of the SCR.</p> <p>DOE-RL/WHC Response: Refer to disposition number 140.</p>	03/12/93

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143.	<p><u>Page 11-7, line 24.</u> <u>Comment:</u> Section 11.1.4.7. Sampling and analysis quality control/quality assurance (QA/QC) is described in the Draft Hanford Permit.</p> <p><u>Requirement.</u> The QA/QC section must be revised to comply with the QA/QC requirements in the Draft Hanford Permit. In particular, the data validation requirements for clean closure must adhere to the Draft Hanford Permit.</p> <p>DOE-RL/WHC Response: Refer to disposition number 94.</p> <p><u>Ecology Comment:</u> Ecology requires that all clean closure data deliverables be comparable to those provided by laboratories conducting CLP analyses. These deliverables are required so that Ecology can ensure that the lab has followed all appropriate measures during analyses, and a data validation can be conducted if deemed appropriate.</p> <p>DOE-RL/WHC Response 2: As a result of the March 16, 1993, Issue Resolution Meeting on this subject, it was decided that the Data Quality Objective (DQO) process will be the method used to establish the type and quality of data needed.</p> <p>Text will be revised to address the DQO process.</p>	
144.	<p><u>Requirement.</u> This section must address the WAC 173-303-610(4)(a).</p> <p>DOE-RL/WHC Response: Text will be revised in Chapter 11.0, Section 11.1.4. to comply with WAC 173-303-610(4)(a).</p>	03/12/93
145.	<p><u>Page 11-10, line 44.</u> <u>Comment:</u> This section should state that <i>if</i> the clean closure performance standards are met, or other appropriate option under the SCR, the requirement for a survey plat <i>may</i> not be required for closure of the RMW.</p> <p><u>Requirement.</u> Revise the text as necessary.</p>	03/12/93

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	<p>DOE-RL/WHC Response: This text is nearly verbatim (with the following exception, 616 NRDWSF refers to dangerous waste, whereas the RMW Storage Facility refers to radioactive and/or mixed waste) from the 616 NRDWSF Dangerous Waste Permit Application, which has been accepted by Ecology.</p> <p>Refer to disposition number 140.</p>	
146.	<p><u>Page 11-11, line 1.</u> <u>Comment:</u> See the previous comment regarding closure requirements.</p> <p><u>Requirement.</u> This section must be revised to state that <i>if</i> the RMW achieves the clean closure performance standard, or other appropriate option under the SCR, the requirement for a notice to the local land authority <i>may</i> not be required.</p> <p>DOE-RL/WHC Response: This text is nearly verbatim (with the following exception, 616 NRDWSF refers to dangerous waste, whereas the RMW Storage Facility refers to radioactive and/or mixed waste) from the 616 NRDWSF Dangerous Waste Permit Application, which has been accepted by Ecology.</p> <p>Refer to disposition number 140.</p>	03/12/93
147.	<p><u>Page 11-11, line 9.</u> <u>Comment:</u> See the above comments.</p> <p><u>Requirement.</u> Revise this section as necessary.</p> <p>DOE-RL/WHC Response: This text is nearly verbatim (with the following exception, 616 NRDWSF refers to dangerous waste, whereas the RMW Storage Facility refers to radioactive and/or mixed waste) from the 616 NRDWSF Dangerous Waste Permit Application, which has been accepted by Ecology.</p> <p>Refer to disposition number 140.</p>	03/12/93

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148.	<p>Page 11-11, line 17. <u>Comment:</u> See the above comments.</p> <p><u>Requirement.</u> Revise this section as necessary.</p> <p>DOE-RL/WHC Response: This text is nearly verbatim (with the following exception, 616 NRDWSF refers to dangerous waste, whereas the RMW Storage Facility refers to radioactive and/or mixed waste) from the 616 NRDWSF Dangerous Waste Permit Application, which has been accepted by Ecology. Refer to disposition number 140.</p>	03/12/93
149.	<p>Page F11-1, figure. <u>Comment:</u> The flow path for the asphalt pad does not include radioactive surveying. This is the minimum which should be done in order to properly dispose of the pad.</p> <p><u>Requirement.</u> Add a section to the flow path for the asphalt pad showing radiation surveying will be performed prior to disposal.</p> <p>DOE-RL/WHC Response: Text will remain unmodified. Refer to disposition number 3.</p> <p>Ecology Comment: All components which are shown on Page F11-1 clearly indicate that a radiation survey is performed prior to decontamination. Why is the asphalt pad exempt from this requirement? The asphalt pad must also be surveyed to determine if there is any radioactivity present.</p> <p>DOE-RL/WHC Response 2: Refer to DOE-RL/WHC Response for comment number 3 regarding radionuclides. Text will be modified to show that a radiation survey will be performed on the Waste Receiving and Staging Area (asphalt pad) prior to determining the method of disposal. Radiation surveys will be performed in areas which have stored radioactive and/or mixed waste to ensure worker safety and to assist in determining areas of possible dangerous waste contamination. The results of the radiation survey will not be used in determining RCRA closure criteria.</p>	

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150.	<p><u>Page 12-5, line 16.</u> <u>Comment:</u> This statement is nonsensical. It says that if the RMW has to stop operations because of an emergency, the BED will notify DOE-RL that the facility is operational and emergency cleanup is complete! The intent is apparent to Ecology in the sentence, but the message has been garbled.</p> <p><u>Requirement.</u> Rewrite this section to conform to WAC 173-303-360(2)(i) and (j) requirements.</p> <p><u>DOE-RL/WHC Response:</u> This text is verbatim from the 616 NRDWSF Dangerous Waste Permit Application, which has been accepted by Ecology.</p> <p><u>Ecology Comment:</u> Although this text is verbatim from the 616 permit, as written, the sentence is out of context. This sentence states that cleanup operations are complete when they have been initiated. Rewrite the sentence to show that cleanup operations are underway.</p> <p><u>DOE-RL/WHC Response 2:</u> Text will be modified to read: If the RMW Storage Facility stops operations in response to a fire, an explosion, or a release that could present a hazard to human health or the environment, the building emergency director notifies DOE-RL. The DOE-RL will then notify Ecology and appropriate local authorities. When clean-up is completed, DOE-RL will notify Ecology and appropriate local authorities before operations are resumed.</p>	
151.	<p><u>Page 12-5, line 18.</u> <u>Comment:</u> It is often stated that notification will be via "line management".</p> <p><u>Requirement.</u> Please define this term and provide the full description of how notification is made.</p> <p><u>DOE-RL/WHC Response:</u> This text is verbatim from the 616 NRDWSF Dangerous Waste Permit Application, which has been accepted by Ecology.</p>	03/12/93

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152.	<p>Page 12-5, line 32. <u>Comment</u>: See comment 130.</p> <p><u>Requirement</u>. Delete the words "outside the Hanford Facility" from the end of this sentence.</p> <p>DOE-RL/WHC Response: This text is verbatim from the 616 NRDWSF Dangerous Waste Permit Application, which has been accepted by Ecology.</p> <p>Ecology Comment: Regardless of the fact that this is written verbatim from the 616 permit, "outside the Hanford Facility" is unacceptable. WAC 173-303-360 states that whenever there is a possible hazard to human health or the environment, the appropriate local, state and federal officials must be contacted. There is nothing that states this should only be done when this occurs outside the facility. Delete "outside the facility".</p> <p>DOE-RL/WHC Response 2: Text will be revised to read: 'outside the RMW Storage Facility.'</p>	
153.	<p>Page 12-6, line 1. <u>Comment</u>: Those incidents that Ecology considers as having required implementation of the contingency plan are defined in the Draft Hanford Permit Facility-wide contingency plan.</p> <p><u>Requirement</u>. Refer to this definition in this section regarding WAC 173-303-360(2)(k) reporting.</p> <p>DOE-RL/WHC Response: This text is verbatim from the 616 NRDWSF Dangerous Waste Permit Application, which has been accepted by Ecology. Refer to disposition number 103.</p>	03/12/93
154.	<p>Page 12-6, line 44. <u>Comment</u>: The Occurrence Notification Center has been referenced as the group responsible for notifications.</p> <p><u>Requirement</u>. See comment number 26.</p> <p>DOE-RL/WHC Response: Refer to disposition number 27.</p>	03/12/93

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155.	<p><u>Page 12-7, line 10.</u> <u>Comment:</u> The details of the spill reporting must be provided in this section. It is not sufficient to simply reference the WAC 173-303-145.</p> <p><u>Requirement.</u> Specifically address the different scenarios under WAC 173-303-145(2)(a),(b),(c), and (d) separately.</p> <p>DOE-RL/WHC Response: This text is verbatim from the 616 NRDWSF Dangerous Waste Permit Application, which has been accepted by Ecology.</p>	03/12/93
156.	<p><u>Page 12-7, line 25.</u> <u>Comment:</u> An equivalent delivery service? The WAC 173-303 specifically calls for registered mail.</p> <p><u>Requirement.</u> State what other equivalent service may be utilized.</p> <p>DOE-RL/WHC Response: This text is verbatim from the 616 NRDWSF Dangerous Waste Permit Application, which has been accepted by Ecology.</p>	03/12/93
157.	<p><u>Page 12-7, line 30.</u> <u>Comment:</u> A survey plat will be required if the RMW, upon closure, leaves dangerous waste in place and is closed as a landfill.</p> <p><u>Requirement.</u> Caveat the statement in this section with the above.</p> <p>DOE-RL/WHC Response: This text is verbatim from the 616 NRDWSF Dangerous Waste Permit Application, which has been accepted by Ecology.</p>	03/12/93
158.	<p><u>Page 12-7, line 34.</u> <u>Comment:</u> Post-closure reports will also be required if the RMW undergoes post-closure activities and is closed as a landfill.</p> <p><u>Requirement.</u> Qualify the statement in this section with the above.</p> <p>DOE-RL/WHC Response: This text is verbatim from the 616 NRDWSF Dangerous Waste Permit Application, which has been accepted by Ecology.</p>	03/12/93

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159.	<p><u>Page 12-8, line 16.</u> <u>Comment:</u> The inspection log must be kept for the period required in the Draft Hanford Permit. The inspection schedule (plan) must be kept at the RMW for the length of the operational life.</p> <p><u>Requirement.</u> Reword this section to accurately reflect the record-keeping requirements of the Chapter 173-303 WAC.</p> <p>DOE-RL/WHC Response: Current text is appropriate. The WAC 173-303-320(2)(d) states that the log or summary must be kept at the unit for at least 5 years from the date of inspection.</p>	03/12/93
160.	<p><u>Page 12-8, line 19.</u> <u>Comment:</u> This sentence does not reflect that Ecology approval is required prior to inclusion of changes.</p> <p><u>Requirement.</u> Add the words "upon approval by Ecology will be" between the words "and" and "added".</p> <p>DOE-RL/WHC Response: This text is verbatim from the 616 NRDWSF Dangerous Waste Permit Application, which has been accepted by Ecology.</p>	03/12/93
161.	<p><u>Page 12-9, line 5.</u> <u>Comment:</u> This line says that records of waste analysis are kept. By whom and where?</p> <p><u>Requirement.</u> Include what group(s) is/are responsible for maintaining these records and where they are located.</p> <p>DOE-RL/WHC Response: This text is verbatim from the 616 NRDWSF Dangerous Waste Permit Application, which has been accepted by Ecology.</p>	03/12/93
162.	<p><u>Page 12-9, line 13.</u> <u>Comment:</u> The Draft Hanford Permit requires occurrence reports to be kept in the operating record of the RMW.</p> <p><u>Requirement.</u> Add this condition to this section.</p> <p>DOE-RL/WHC Response: This text is verbatim from the 616 NRDWSF Dangerous Waste Permit Application, which has been accepted by Ecology.</p>	03/12/93

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163.	<p><u>Page 12-9.</u> <u>Comment:</u> The notification to off-site generators required by WAC 173-303-290(3) is not listed here for inclusion in the operating record.</p> <p><u>Requirement.</u> These notices must be maintained in the operating record pursuant to WAC 173-303-290(3). Add this to the operating records section.</p> <p><u>DOE-RL/WHC Response:</u> This text is verbatim from the 616 NRDWSF Dangerous Waste Permit Application, which has been accepted by Ecology.</p> <p><u>Ecology Comment:</u> It is stated in the operating record section of recordkeeping, that report records are included. Does this include the "required notices" which are a requirement of WAC 173-303-290. If not, where are the required notices kept that are specified by WAC 173-303-290.</p> <p><u>DOE-RL/WHC Response 2:</u> The required notification to offsite generators for waste storage and disposal is provided in the transmittal letter for the Storage/Disposal Approval Record (SDAR), which is issued to every offsite generator for every waste shipment. These records are maintained with the SDARs and are kept in the Solid Waste Management files, which are part of the permanent records.</p> <p>Text will be modified in Section 12.4.2.2 Operating Records, to address WAC 173-303-380(h) and WAC 173-303-290(3).</p>	
164.	<p><u>Page 12-9, line 31.</u> <u>Comment:</u> Waste Minimization records and LDR records must be made available to EPA and Ecology for review.</p> <p><u>Requirement.</u> Provide Waste Minimization records and LDR records to EPA and Ecology for review.</p> <p><u>DOE-RL/WHC Response:</u> This text is nearly verbatim from the 616 NRDWSF Dangerous Waste Permit Application, which has been accepted by Ecology.</p>	03/12/93

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165.	<p>Page 12-12, line 12. <u>Comment</u>: The Privacy Act language is included in this section. <u>Requirement</u>. See comment 132. DOE-RL/WHC Response: Refer to disposition number 134.</p>	03/12/93
166.	<p>Page 12-12, line 26. <u>Comment</u>: The Hanford Facility is also operated by the Westinghouse Hanford Company (WHC), and Battelle Memorial Institute/Pacific Northwest Labs (PNL). <u>Requirement</u>. WHC and PNL are officially recognized as operators of the Hanford Facility in the Draft Hanford Permit. 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 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 <u>overall</u> operation of a facility (WAC 173-303-040). Neither WHC nor PNL are responsible for the <u>overall</u> operation of either the Hanford Facility or any individual TSD unit within the Hanford Facility. The parties to the <i>FFACO</i> 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.</p>	03/12/93
167.	<p>Page T12-1.2. <u>Comment</u>: The table on this page refers to the Central Waste Complex (CWC) as the location of records, but does not state what building they are kept in. <u>Requirement</u>. State specifically what building and room the records are kept in. This must be shown for each item listed, unless they are all kept at the same location at the CWC.</p>	03/12/93

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	DOE-RL/WHC Response: This location might change over the years based on storage volume and room availability. To identify the exact location within the Hanford Central Waste Complex (or any other location on the Hanford Facility), could require unnecessary modification to the permit. Ecology, upon request, will have access to these records.	
168.	<p><u>Page T12-1.2.</u> <u>Comment:</u> There is a similar problem to the one stated above in regard to records kept at the Hanford Facility and the RMW.</p> <p><u>Requirement.</u> It must be stated specifically where these records are kept. See the previous comment.</p> <p>DOE-RL/WHC Response: Refer to disposition number 167.</p>	03/12/93
169.	<p><u>Page 13-1, line 44.</u> <u>Comment:</u> The language in this section is not in agreement with Ecology's position on mixed waste.</p> <p><u>Requirement.</u> This sentence must be deleted from the permit application.</p> <p>DOE-RL/WHC Response: Refer to disposition number 3.</p>	03/12/93
170.	<p><u>Page 15-5, line 9.</u> <u>Comment:</u> The State Hazardous Waste Management Act, 70.105 RCW is missing from this list of Federal and State acts.</p> <p><u>Requirement.</u> Add a reference to this act in this section.</p> <p>DOE-RL/WHC Response: Referenced is identified on Page 15-5, Line 23.</p>	03/12/93

CORRESPONDENCE DISTRIBUTION COVERSHEET

Author	Addressee	Correspondence No.
J. E. Rasmussen, RL R. E. Lerch, WHC (B. M. Barnes, WHC)	G. C. Hofer, EPA R. F. Stanley, Ecology	Incoming 9305702 Xref 9354494D

Subject: RESPONSE TO THE HANFORD FACILITY DANGEROUS WASTE PERMIT APPLICATION,
 HANFORD CENTRAL WASTE COMPLEX-RADIOACTIVE MIXED WASTE STORAGE
 FACILITY, REVISION 0, NOTICE OF DEFICIENCY (TS-2-4)

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