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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

1315 W. 4th Avenue • Kennewick, Washington 99336-6018 • (509) 735-7581

July 28, 1999

Mr. Hector Rodriguez
U.S. Department of Energy
P.O. Box 550, MSIN: A5-15
Richland, Washington 99352



Dear Mr. Rodriguez:

Re: Notice of Deficiency for Double Shell Tanks System and 204-AR Waste Unloading Station Draft B Permit Application

Enclosed is the Notice of Deficiency (NOD) for the Double Shell Tanks (DST) System and the 204-AR Waste Unloading Station draft Part B Permit Application. The NOD has been prepared for the draft Chapter 6, Procedures to Prevent Hazards, provided to the Washington State Department of Ecology (Ecology).

This NOD is to assist the U.S. Department of Energy (USDOE) in revising the chapter to meet the requirements for an adequate permit application. Ecology will consider a response table addressing the NOD comments. The final application will be reviewed in regard to these comments.

Upon submission, the certified permit application will be subject to the formal review and response process in accordance with the Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) and the Hanford Facility Dangerous Waste Permit.

If you have any questions, please feel free to contact me at (509) 736-3019.

Sincerely,

Jeanne Wallace, Double Shell Tank Permit Manager
Nuclear Waste Program

JJW:sdb
Enclosure

cc: Fred Ruck, FDH
Charles Mulkey, LMHC
Nina Menard, WMH
Mary Lou Blazek, OOE
Administrative Record: Double Shell Tank System and 204-AR Waste Unloading Station

Double Shell Tanks & 204-AR System Part B Draft Application
6.0 Procedures To Prevent Hazards
 Ecology Received Draft Chapter 1999

<u>Comment Number</u>	<u>Section Number, Page Number, and Comment</u> (Comments without section or page number were omitted from the chapter.)
Chapter 6	
1.	6-2, 28. Describe the items, or groups of items, to be inspected and the schedule for inspecting them. Be specific in identifying items to be inspected. For example, "personal protective equipment" is general, but listing "full face respirator" is specific.
2.	6-2, 30. Identify the types of problems to look for during inspections, for example, wet spots and other signs of leaks.
3.	6-2, 29. Describe the frequency of inspection for specific items on the schedule. Be specific: "at least every 30 days" or "at least every 7 days" rather than "weekly" or "monthly." Include inspection of loading/unloading areas.
4.	6-2, 28. Areas subject to spills, such as storage areas and loading/unloading areas, and major features of the site must be inspected daily when in use.
5.	6-2, 32. Describe where the schedule will be kept at the facility. Identify where the operating record is maintained. Indicate the location on map(s) or diagram(s).
6.	6.2. Describe the inspection log(s) used to record data from inspections and provide example logs. Show that the logs will include, at a minimum, the following: <ul style="list-style-type: none"> • date and time of inspection, • printed name and the handwritten signature of the inspector, • a notation of the observations made, • an account of spills or discharges in accordance with WAC 173-303-145, and • the date and nature of any repairs or remedial actions taken.
7.	6-2, 43. The schedule and procedure must demonstrate that, where a hazard is imminent or has already occurred, remedial action will be taken immediately.
8.	6-3, 26. The schedules and procedures must specify actual timelines for taking corrective measures for each type or category of problem encountered.
9.	6-3, 26. Schedules and procedures must identify which employee(s) is/are responsible for taking corrective action or ensuring other staff remedy the problem(s).
10.	6-3, 26. For major categories of problems, describe the remedies to be taken; for example, to repair cracks in the secondary containment of a storage/treatment area.
11.	6-2, 19. Specifically address all the checklist requirements for container and tank system inspections and corrective actions. See Sections F-2d and F-2d (2).
12.	6-2, 19. Address requirements for specific process or waste type inspections.
13.	6-2, 19. Identify where the log of inspections will be maintained. Explain how corrective action data sheets are tracked, and where are they maintained.
14.	6-5, 7. Explain what is done about the "source" of leakage from a tank. Describe procedures if a tank overflows.
15.	6-7, 6. Show the location of internal communication and alarm systems at the facility and ensure communications are coordinated from all areas.
16.	6-7, 6. Specifically address the units covered in this permit application.

17.	6-7, 6. The permit application needs to demonstrate that if there is even one employee on the premises while the facility is operating, that employee will have immediate access to external communications.
18.	6-7, 33. Expand the emergency equipment discussion to include spill control and decontamination.
19.	6-7, 33. Address the location or availability of emergency equipment in the dangerous and mixed waste storage areas.
20.	6-8, 6. Demonstrate that the facility has water at adequate volume and pressure for fire response. Specify if the Hanford Fire Department tests the fire control systems on site.
21.	6-9, 1. Address loading and unloading of waste from dangerous and mixed waste storage areas.
22.	6-9, 1. Describe spill response and containment procedures in loading and unloading areas.
23.	6-9, 1. Explain how spills will be contained within the TSD unit boundary.
24.	6-9, 21. Specify, if in the event of an equipment and/or power failure, which waste processing activities will cease. Indicate if alarms, tank level gauges, or ventilation systems are disabled if power failure occurs.
25.	6-9, 39. Identify the PPE located in each of the waste management areas.
26.	6-9, 39. Describe precautions taken to prevent personnel exposure to fumes.
27.	6-10, 6. Specify the location of flammable storage cabinets within the TSD unit boundary.
28.	6-10, 6. This section needs additional detail, refer to the regulatory requirements provided in WAC 173-303-806(c) and WAC 173-303-640(9).