



START

9713508.1108

0045928

Department of Energy
Richland Operations Office
P.O. Box 550
Richland, Washington 99352

OCT 10 1996

97-EAP-020

Mr. Moses N. Jaraysi
200 Area Unit Supervisor
Nuclear Waste Program
State of Washington
Department of Ecology
1315 West Fourth Avenue
Kennewick, Washington 99336-6018

Mr. Joseph J. Witczak
Unit Supervisor
Regulatory and Technical Support
Nuclear Waste Program
State of Washington
Department of Ecology
P.O. Box 47600
Olympia, Washington 98504-7600



Dear Messrs. Jaraysi and Witczak:

QUARTERLY NOTIFICATION OF CLASS 1 MODIFICATIONS TO THE HANFORD FACILITY RESOURCE CONSERVATION AND RECOVERY ACT PERMIT, DANGEROUS WASTE PORTION (QUARTER ENDING SEPTEMBER 30, 1996 — PERMIT CONDITION I.C.3.)

Condition I.C.3. of the Hanford Facility Resource Conservation and Recovery Act Permit (RCRA Permit), Dangerous Waste Portion (DW Portion), addresses Class 1 modifications as defined in Washington Administrative Code (WAC) 173-303-830(4)(a)(i)(A). This condition allows for quarterly notification of Class 1 modifications to be made to the State of Washington Department of Ecology (Ecology). These modifications are under implementation. A listing of these modifications is maintained in the Hanford Facility Operating Record. The Class 1 modifications are discussed as follows.

The Hanford Facility RCRA Permit (DW Portion) has been modified this quarter to update information in Part II and Part III (Enclosure). Part II modifications pertain to Condition II.A.4. Part III Class 1 modifications pertain to the 305-B Storage Facility. The Class 1 modifications are being made to ensure that all activities conducted are in compliance with the RCRA Permit (DW Portion).

Should Ecology determine that the enclosed modifications do not qualify as Class 1 modifications as defined in WAC 173-303-830, written authorization to continue operations is requested until the appropriate level of modification can be accomplished.

In accordance with a teleconference held with Moses Jaraysi of Ecology on March 3, 1995, a transmittal letter signed by the permittees is sufficient to

Messrs. Jaraysi and Witczak
97-EAP-020

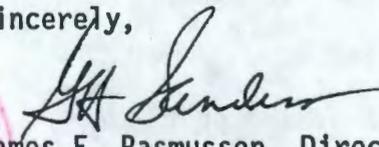
-2-

OCT 10 1996

authorize the submittal of the Quarterly Notification of Class 1 Modifications to the Hanford Facility RCRA Permit (DW Portion) and to meet the intent of Permit Condition I.F., Signatory Requirement.

Should you have any questions regarding this information, please contact Ellen M. Mattlin, U.S. Department of Energy, Richland Operations Office (RL), on (509) 376-2385; Susan M. Price, Fluor Daniel Hanford, Inc., on (509) 376-1653; or Harold T. Tilden II, Pacific Northwest National Laboratory (PNNL), on (509) 376-0499.

Sincerely,

for 

James E. Rasmussen, Director
Environmental Assurance, Permits,
and Policy Division
DOE Richland Operations Office

EAP:HMR



S.M. Price for

William D. Adair, Director
Environmental Protection
Responsible Party for
Fluor Daniel Hanford, Inc.

Glen R. Hovee for KCB

Kenneth C. Brog, Director
Environment, Safety, and Health
Pacific Northwest National Laboratory

Enclosure:
Class 1 Modifications to
the Hanford Facility
RCRA Permit (DW Portion)
(Quarter Ending
September 30, 1996)

cc w/encl:

EDMC, H6-08
R. Jim, YIN
D. Powaukee, NPT
R. Landon, BHI
L. Mihalik, BHI
S. Price, WHC
E. Flores, PNNL
H. Tilden, PNNL
J. Wilkinson, CTUIR

cc w/o encl:

K. Brog, PNNL
W. Dixon, WHC
M. Hughes, BHI
D. Lundstrom, Ecology
D. Sherwood, EPA
J. Stohr, Ecology

**QUARTERLY NOTIFICATION OF CLASS 1 MODIFICATIONS TO
THE HANFORD FACILITY RCRA PERMIT,
DANGEROUS WASTE PORTION
(Quarter Ending September 30, 1996)**

Page 1 of 4

**PART II CLASS 1 MODIFICATIONS:
GENERAL FACILITY CONDITIONS**

1. Hanford Facility RCRA (DW Portion) Condition II.A.4., Page 25, lines 21-24: Delete and replace with "The Permittees shall comply with the requirements of WAC 173-303-350(3) and -360(1) concerning the emergency coordinator, except that the names and home telephone numbers will be on file with the ~~single point-of-contact~~ Occurrence Notification Center, phone number (509) ~~373-3800 or 375-2400 as described in the Hanford Facility Contingency Plan 376-2900.~~"

Reason: The Occurrence Notification Center (ONC) not longer performs this function since it no longer is a 24-hour functioning entity.

9713508.1111

**PART III CLASS 1 MODIFICATIONS:
305-B STORAGE FACILITY UNIT-SPECIFIC CONDITIONS**

1. Pages 6-5 and 6-6, Figure 6-2; Weekly Inspection Checklist Form: Remove and replace with attached pages.

Reason: The inspection form was updated to reflect the current layout of the highbay waste storage area, and to be consistent with waste designations (other regulated material is now class 9).

9713508.1112

**PART III CLASS 1 MODIFICATIONS:
305-B STORAGE FACILITY UNIT-SPECIFIC CONDITIONS (cont.)**

Replacement pages for DOE-RL 90-01, Rev. 1
Chapter 6

Pages: 6-5 and 6-6

Weekly Inspection Form
305-B Chemical Waste Storage Unit

Inspector Name (print): _____ Inspector Signature: _____ Time/Date: _____

Co-Inspector Name (print): _____ Co-Inspector Signature: _____ Time/Date: _____

Waste Containment Locations (Y=Yes, N=No)

Earliest PCB Accumulation Date in Cell 2: _____

Cell:	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Oxidizer Acids	Poison, PCB Class 9	Caustic, WSDW Non-Reg	Flammable, Combustible, Aerosols	Flammable Building, Cylinders	Asbestos	Non-Flammable RMW	Flammable Drum Storage	Flammable RMW	Non-Reg Yard	WSDW, Class 9 Non-Reg. Drums	Oxidizer Drums	Acid Drums	Alkaline Drums
containers integrity good?	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____
containers properly sealed?	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____
containers properly labeled?	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____
containers properly segregated?	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____
floor free of major cracks/gaps?	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____
sumps empty and dry?	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____	_____

minimum aisle space present? _____ (44" leading to building exits, 36" all other aisles per NFPA 101, UBC 3315(b)1 and WAC 173-303)

inventory below 30,000 gallon design capacity? _____ Estimated Volume = _____ gallons

inventory below UBC Class B limits? _____ (<480 gallons 1-A, 1-B, 1-C total and/or <240 gallons 1B)

daily inspections logged? _____

Figure 6-2: Weekly Inspection Checklist Form 6-5

