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DEPARTMENT OF ECOLOGY

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April 26, 1991

RECEIVED MAY 03 1991 CORRESPONDENCE CONTROL

Mr. Steven H. Wisness
Hanford Project Manager
U.S. Department of Energy
P.O. Box 550
Richland, Washington 99352

Re: Notice of Deficiency (NOD) for the 305-B Storage Facility

Dear Mr. Wisness:

This letter transmits Ecology's comments on the 305-B Radioactive Mixed Waste Storage Facility Part B Permit Application NOD Response Table of January 30, 1991. The response table and permit application were reviewed for compliance with final facility status standards in the state Dangerous Waste Regulations (Chapter 173-303 WAC).

I am requesting that USDOE/PNL respond to these comments by redrafting the permit application. This response should be submitted no later than June 25, 1991. Should you have questions or concerns regarding this notice, please contact Megan Lerchen at (206) 438-3089.

Sincerely,

Timothy L. Nord
Hanford Project Manager

Enclosure

cc: P. Day - EPA Richland
D. Duncan - EPA, Seattle
D. Nylander - Ecology, Kennewick
T. Veneziano - AR

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DEPARTMENT OF ECOLOGY
NOTICE OF DEFICIENCY FOR
THE 305-B STORAGE UNIT PART B
PERMIT APPLICATION DRAFT TEXT
REVISIONS OF JANUARY 1991
April 26, 1991

The following comments correspond to the numbers from the 305-B Storage Facility Part B Permit Application NOD Response Table of July 26, 1990.

5. **USDOE/WHC Proposal:** The draft text states, "Flammable RMW ... is stored in ... individual secondary containment structures."

   Ecology Response: Secondary containment in over-90-day storage facilities must be permanent. See number 23.

6. **USDOE/WHC Proposal:** "Impervious" gloves are mentioned.

   The text also discusses actions to be taken if incompatible materials are mixed. There is no mention of any action to prevent future mixing of incompatible materials.

   Ecology Response: It would be more appropriate to describe gloves as "resistant." Impervious suggests that the gloves would not transmit any material.

   If it is discovered that incompatible materials are mixed, it will be necessary to correct the underlying cause. For example, if the compatibility chart is incorrect, then it must be revised or, conversely, if the wastes were incorrectly designated, then the generator's waste designation must be subjected to greater levels of scrutiny.

8. **USDOE/WHC Proposal:** Replace existing Figure 2-3 with new Figure 2-3.

   Ecology Response: This does not satisfy this deficiency comment. This figure (or figures) must clearly show exits, loading docks, and access routes between floors. Walls and barriers must be clearly differentiated in the design drawings. In addition, containment systems, including trenches, sumps, and sloping of floors must be illustrated with dimensions.

17. **USDOE/WHC Proposal:** Verification of waste designation by inspection, "to verify the information on the request form, such as number, sizes, and types of containers, location of waste, etc., and to check for proper containerization of waste." Typical discrepancies are described as, "... not as described on waste form or lack of supporting data to verify waste characteristics."

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

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18. **USDOE/WHC Proposal:** The proposed text states, "Waste shipments received at the 305-B unit containing manifest discrepancies are not accepted unless the discrepancy or discrepancies can be resolved with the generating unit at the time the shipment is received. ... If the discrepancy cannot be resolved within 15 days of receipt of the shipment, the 305-B unit will file the report required by WAC 173-303-370(4)(b) ...."

    Ecology Response: The quoted text contains inconsistent statements. Clarify what procedures and time-frames are applicable in resolving manifest discrepancies. Also describe what will be done if waste verification analyses results in discovery of waste designation discrepancies.

23. **USDOE/WHC Proposal:** Flammable RMW will be stored in temporary secondary containment devices.

    Ecology Response: As stated in the previous NOD, "Drip pans or other temporary structures are not acceptable as secondary containment devices by Ecology for over-90 day storage facilities. Permanent secondary containment as specified in WAC 173-303-630(7)(a) is required."

27. **USDOE/WHC Proposal:** Labeling of containers is described, but not in detail.

    Ecology Response: Container labeling must be described in detail. Refer to the 616 Nonradioactive Dangerous Waste Storage Facility Part B Permit Application for guidance.

30. **USDOE/WHC Proposal:** Storage of flammable RMW containers in, "individual secondary containment devices, such as drip pans or pallets with secondary containment, adjacent to the cabinet."

    Ecology Response: Temporary secondary containment structures are not acceptable in an over-90 day storage facility. See number 23.

33. **USDOE/WHC Proposal:** A sampling program for wastes is discussed. This discussion states, in part, "... a random number of samples will be collected and analyzed statistically using the procedures specified in Section 9.2 of SW-846 (EPA 1986)."

    Ecology Response: Section 9.2 of SW-846 describes a process for developing a sampling and analysis plan. Development of such a plan is what has been requested in past NOD's and unit manager's meetings for this unit. This topic has been partially remanded to the Hanford Facility-Wide Part B Permit. USDOE and its contractors must develop and implement a sampling and analysis plan for designation of solid wastes. Simple reference to a process for development of such a plan is not adequate.

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38. **USDOE/WHC Proposal:** Addition of a brief description and manufacturer's literature regarding several different chemically resistant floor sealants. No criteria for reapplying the sealant are discussed. The exact products used are not stated.

Ecology Response: State which product(s) was used to seal the floors. The schedule for reapplication of the sealant and the criteria for any off-schedule repairs must be presented.

41. **USDOE/WHC Proposal:** Storage areas in the high bay area previously occupied by the research module have been added. Incompatible waste areas are segregated by 3½" x 6" angle iron bolted to the floor.

Ecology Response: This does not fulfill the requirement of WAC 173-303-630(9)(c); the storage areas for incompatible wastes must be separated, "... by means of a dike, berm, wall, or other device." It is unfortunate that the building modification plans were not submitted to Ecology prior to installation of these unacceptable devices, however, a satisfactory segregation device must be installed. Before further building modifications are conducted, plans should be submitted to Ecology for review.

47. **USDOE/WHC Proposal:** Addition of a statement that, "Groundwater monitoring may be required at the 305-B unit if applicable regulations change, the scope of operations change, or if required under a WDOE/EPA corrective action order."

Ecology Response: WDOE is not the correct abbreviation for Ecology and is inconsistent with the usage throughout the permit application. Compliance with any enforcement action by Ecology is mandatory. Furthermore, if there is a spill with potential for groundwater contamination at the 305-B unit, then groundwater monitoring as stipulated under WAC 173-303-645 is required. Revise the permit application with specific plans for complying with the requirements of WAC 173-303-645 in the event of a spill.

50. **USDOE/WHC Proposal:** Replacing the checklists depicted in Figures 6-2 and 6-3.

Ecology Response: The following are some problems with the replacement checklists:

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

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

88. **USDOE/WHC Proposal:** No provision of closure cost estimates will be made because the 305-B Unit is a federally owned facility.

Ecology Response: Closure cost estimates must be provided annually as agreed upon within the scope of the Hanford Sitewide Part B Permit.

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Author	Addressee	Correspondence No.
TL Nord, Ecology	SH Wisness, DOE-RL	9101766

Subject: Notice of Deficiency (NOD) for the 305-B Storage Facility

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