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STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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November 3, 1992



Mr. Jim Bauer, Director  
U.S. Department of Energy  
P.O. Box 550, A5-15  
Richland, Washington 99352-0550

Dear Mr. Bauer:

Re: NOD List for 222-S Laboratory Dangerous Waste Permit  
Application, M-20-22.

Enclosed, please find the Notice of Deficiency Commentary for your 222-S Laboratory Dangerous Waste Permit Application DOE/RL-91-27, Rev. 0.

I propose that we schedule a Unit Manager's meeting to discuss this commentary on November 24, 1992, and in the afternoon so that I can minimize travel.

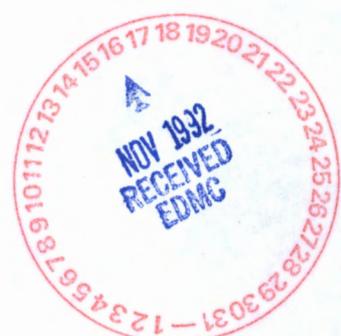
If you have any questions about this letter, please call me at (206) 438-7558.

Sincerely,

Gary Anderson, P.E.  
Environmental Engineer 3  
Nuclear and Mixed Waste Management

GA:dr  
Enclosure

- cc: Dan Duncan, EPA
- J.M.Hennig, DOE
- R.M.Hiegel, DOE
- David Jansen, Ecology
- Toby Michelena, Ecology
- Dave Nylander, Ecology
- Rick Oldham, WHC
- J.E. Rasmussen, DOE
- Doug Sherwood, EPA
- B. Austin, WHC ✓



DEPARTMENT OF ECOLOGY  
COMMENTS ON THE PART B PERMIT APPLICATION  
FOR THE 222-S LABORATORY COMPLEX

October 26, 1992

Comment Number	Page No., Section No., Line No.	Comment or Requirement
1.	1-5, 1.4., 41	<p><u>Comment</u>: The acceptable definition of "facility", as used in this application, should be compatible with the definition in the draft site-wide permit.</p> <p><u>Requirement</u>: Delete the present definition of Hanford Facility. Add the following: "The term facility means the contiguous land, structures, appurtenances and improvements on the land used for recycling, reusing, reclaiming, transferring storing, treating, or disposing of dangerous waste. The boundary of this Facility is the legal and physical description of all the land in Benton, Franklin, and Grant Counties included herein." Include the boundary description for all the land in the Hanford Reservation.</p>
2.	2-5, 2.1.3.3., 43	<p><u>Comment</u>: Although the nitric acid tanks are not regulated, the contents become waste if they leak or are spilled.</p> <p><u>Requirement</u>: Please discuss containment of any spilled nitric acid at either the outside or inside tank.</p>
3.	2-6., 2.1.3.3., 20	<p><u>Comment</u>: Suppose the waste in the 207-SL Retention Basin is found to be hazardous, what is its disposition?</p> <p><u>Requirement</u>: Show what happens when hazardous waste is found in the 207-SL Retention Basin.</p>
4.	3-10	<p><u>Comment</u>: Incompatible wastes are not discussed on this page or in this Section.</p> <p><u>Requirement</u>: Discuss incompatible wastes in this Section.</p>

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5. 4-25, 4.2.5., 41 Comment: This sentence does not go far enough. The requirements of WAC 173-303-640 do apply to the 219-S Waste Handling Facility. The requirements of WAC 173-303-640(11) are related to wastes FO20, FO21, FO22, FO23, FO26, and FO27.
- Requirement: Rewrite this sentence to conform to the regulations.
6. 6-3, 6.2.1. Comment: This Section does not mention the specific requirement of WAC 173-303-395(d) to have the Facility inspected by a fire prevention professional or fire marshal annually.
- Requirement: Change the inspection plan to include fire inspection by professional experts.
7. 6-4, 6.2.1. Comment: This sub-section does not list all the items to be inspected under the requirements of WAC 173-303-640.
- Requirement: Please include a tabulation of all check lists including items checked, type of check (visual, aural, etc.), frequency of inspection, result expected, etc., as an example. The tabulation in the Permit application for the 242-A evaporator is a model for all permit applications.
8. 11-1, 11.0, 40 Comment: Action levels for all contaminants of concern are background only, not risk based. State only wastes must be cleaned up to designation levels.
- Requirement: Delete all references to risk based standards unless used in the context of applying the nuclear and mixed waste programs soil cleanup policy.

9. 11-3,  
11.1.1.,  
33  
Portland cement concrete always cracks. Either this slab is randomly cracked or it has fabricated joints. These cracks or joints have the capacity to convey hazardous spills to the ground under the slab.  
  
Requirement: If there is any record or stain that shows a spill, sampling for hazardous substances must be done.
10. 11-4,  
11.1.1.2.,  
22  
Comment: SW-846 (EPA-1986) is an obsolete document.  
  
Requirement: Please quote the latest edition or State SW-846, latest edition, or some equivalent citation.
11. 11-6,  
11.1.1.2.2.,  
44  
Comment: Wipe samples indicate presence or absence of hazardous substances. Background is defined as a volumetric concentration.  
  
Requirement: How will one be compared to the other?
12. 11-12,  
11.1.4.4.2.,  
8  
Comment: The citation of the "most recent version of SW-846 (EPA-1986)" is incorrect since the latest edition of any reference cannot be dated as the previous edition.  
  
Requirement: Delete the parenthetical "(EPA-1986)."
13. 12-2,12.3.,  
40  
Comment: On-site transporter requirements described here are not the same as those described in the proposed site-wide permit.  
  
Requirement: On-site transporter requirements should be the same as those in the proposed site-wide permit.
14. 14-1, 14.0.,  
33  
Comment: The Washington Department of Ecology does not recognize the status "Co-operator", here or any other place in the application.  
  
Requirement: Substitute the word "Operator" or "Permittee" for the word "Co-operator" where used in this context.

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15. Appendices 3A and 3B This office has accepted the Hanford Site Liquid Effluent Characterization Program, Quality Assurance Program Plan, WHC-SD WM-QAPP-011, Rev. 2 as the standard procedure for sampling and analysis for characterization at the Hanford Facility.
- Requirement: Please be certain that all procedures shown in these Appendices conform to this document. It is understood that this procedure may have to be modified by the conditions imposed by certain sites.
16. Appendix 3A, Page 2, Section 3.1. Comment: The disposition of the lab packs is not mentioned here.
- Requirement: State the disposition of the lab packs.
17. Appendix 3A, Page 11, Sections 4.4. and 5. Comment: Is the "chain of possession" in Section 4.4. the same as the "chain of custody" in Section 5.?
- Requirement: Either explain the difference or make the wording uniform.
18. Appendix 3B, Page 14, Section 3.6. Comment: The data for entry into the sampling logbook does not include the matrix of the sample (i.e. soil, water, oil and etc.).
- Requirement: Please include the sample matrix in the data entered into the logbook.
19. Appendix 3B, Page 17, Section 3.8., Line 9 Comment: This Section says that off-site waste is not accepted at the 222-S Dangerous and Mixed Waste Storage Area. Page 1, Section 3.0., line 37, says that off-site samples are accepted.
- Requirement: Explain the apparent inconsistency.

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20. Appendix 3B, Page 20, Table 3.4., Footnote, and Other Places  
Comment: The 1986 edition of SW-846 is quoted.  
Requirement: Please use the latest version of SW-846.
21. Appendix 4A  
Comment: Some of the included drawings are illegible.  
Requirement: Please furnish legible drawings.
22. Appendices 4A, 4B, 4C, 4D  
Comment: These Appendices are not certified by a registered professional engineer. This certification is required by WAC-173-303-806 (4)(a)(i).  
Requirement: Have these items certified by a registered professional engineer.
23. Appendices 3A, and 3B  
Comment: These Appendices do not mention the document Hanford Site Liquid Effluent Characterization Program Quality Assurance Program Plan, WHC-SD-WM-QAPP-011. This document is currently being negotiated between Ecology, the Environmental Protection Agency, and the Department of Energy. When agreed upon, Ecology will regard it as the standard authority for sampling and analysis of liquid samples from all sources at the Hanford Reservation.
24. Appendix 7A, Page 13 of 83  
Comment: Drawing H-2-5170 is not included in the application, and if it were, it would not be the appropriate place to show the 218-W-7 Dry Waste Burial Ground.  
Requirement: Show this Facility on Dwg. H-13-000006.

25. Appendix 7A, Page 16 of 83
- Comment: This building plan does not show exterior doors, creating the impression the staff will evacuate through the walls.
- Requirement: The doors in the 222-S Laboratories be shown with standard architectural symbols.
26. Appendix 7A, Page 20 of 83, Section 3.0., First Bullet
- Comment: This paragraph directly contradicts the photograph on Page 14 of 14, Part A.
- Requirement: Implement the policy stated and avoid a visit from regulatory inspectors.
27. Appendix 7A, Page 19 of 83
- Comment: The Secondary Staging Area shown on this sketch, is directly downwind of the prevailing wind direction at this Facility.
- Move the Secondary Staging Area to a spot opposite the least prevailing wind direction.
- Requirement: The Manford Site Liquid Effluent Characterization Program Quality Assurance Program Plan should be the primary reference and source for Appendices 3A and 3B.

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# CORRESPONDENCE DISTRIBUTION COVERSHEET

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Subject: NOD LIST FOR 222-S LABORATORY DANGEROUS WASTE PERMIT APPLICATION,  
M-20-22

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