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START

DEPARTMENT OF ECOLOGY

March 26, 1993



TO: Toby Michelena
Nuclear and Mixed Waste Management Program

FROM: Megan Lerchen *Megan*
Nuclear and Mixed Waste Management Program

SUBJECT: Compliance Schedules for Waste Analysis Plans in Part B Permits

As you requested, I have reviewed all of the permits in the U. S. Department of Energy's (DOE) Hanford Site Comments Attachments for compliance schedules in their waste analysis plans. I was able to find four examples (some more marginal than others). The text of these are listed below by permit:

Envirosafe Services of Idaho, Inc.
Permit No. IDD073114654

II.C.2. The Permittee shall within one calendar year of the effective date of this permit, for every waste stream received, have on file at this site, Figure C-3, Waste Product Questionnaire, of Attachment 2 of this permit, as provided by the generator. The Permittee may revise Figure C-3, as designated in permit conditions II.C.2.a. and II.C.2.b. without first obtaining a permit modification under 40 CFR §270.41 and 40 CFR §270.42. The procedures designated under Permit Condition II.R. shall be followed to implement these revisions:

U.S. Army Fort Wainwright
Permit No. AK6210022426

II.C.1.c. Section C-1, page C-1, 2nd paragraph, the 2nd sentence is deleted and replaced by the following: "Within one month after the effective date of the permit and within one week after any permit modification to the

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hazardous waste codes which Fort Wainwright is permitted to receive, the Permittee shall inform each generating activity of the hazardous wastes it is permitted to receive and store.

II.C.1.y. In Appendix C-2 of Attachment 1, the Waste Analysis Plan for Wastes Generated On-Site, on page 6, 2nd paragraph, after the "No analytical results...are available.", the following sentence is added: "Fort Wainwright shall sample and chemically analyze the contents of each and every container of spent PD-680 solvent sludge that is generated on Fort Wainwright for at least the first twelve (12) months following the effective date of this permit to identify whether or not each individual container of solid waste exhibits and characteristic with EPA hazardous waste identification numbers D001 through D011 and D018 through D043, or is listed with EPA hazardous identification numbers F001 through F005, using at least the test methods specified in Table C-4 of Attachment 1 of this permit."

Shell Oil Company
Permit No. WAD009275082

- II.C.2. The Permittee shall analyze the wastes listed in Permit Condition II.C.1:
- a. for parameters in Table 13 of Permit Attachment 7, once every three years.
 - b. for parameters in Table 13 of Permit Attachment 7, when a change in crude oil supply from Alaska North Slope or San Joaquin Valley occurs, or when processing of products or wastewater would be expected to significantly alter the chemical composition of the waste.
 - c. for oil and grease, total organic carbon, total Kjeldahl nitrogen, available phosphorus, pH and percent oil/water/solids, each time the wastes are generated or once per year, whichever is less frequent.

MEL:dr