



APR 14 2010

10-ESQ-125

Ms. Jane A. Hedges, Program Manager  
Nuclear Waste Program  
Washington State  
Department of Ecology  
3100 Port of Benton Blvd.  
Richland, Washington 99354

RECEIVED  
APR 19 2010  
EDMC

Dear Ms. Hedges:

RESPONSE TO NOTICE OF VIOLATION RESULTING FROM THE DANGEROUS WASTE PERMIT INSPECTION OF 242-A EVAPORATOR FACILITY BY THE WASHINGTON STATE DEPARTMENT OF ECOLOGY (ECOLOGY)

Reference: Ecology letter from S. Szendre to S. J. Olinger, ORP, and C. G. Spencer, WRPS, "Notice of Violation Resulting from the Dangerous Waste Permit Inspection of 242-A Evaporator Facility (242-A Evaporator) by the Department of Ecology (Ecology)," dated March 15, 2010. 00853915

Per the request of Ecology in the Reference, the joint response from the U.S. Department of Energy, Office of River Protection (facility owner/operator) and the Washington River Protection Solutions LLC (facility co-operator) to the notice of violation from the Dangerous Waste Permit Inspection of 242-A Evaporator Facility is attached. This letter includes:

1. Response to each finding and observation (Attachment 1);
2. Evidence of training verification (Attachment 2); and
3. Draft 242-A Dangerous Waste Permit Modification (Attachment 3).

Portions of the Draft 242-A Dangerous Waste Permit Modification that are Official Use Only, will be provided separately. Please note that we propose some changes to the corrective measures recommended in the Reference, as discussed with Ecology staff on April 8, 2010.

T2.6

**Attachment 1  
10-ESQ-125  
(6 Pages)**

**Response to Violations**

## **RESPONSE TO VIOLATIONS:**

### **1. Hanford Facility Resource Conservation and Recovery Act Permit, Dangerous Waste Portion, Revision 8C, Permit Condition II.C.1:**

“The Permittees will conduct personnel training as required by WAC 173-303-330. The Permittees will maintain documents in accordance with WAC 173-303-330(2) and (3).

The following are permit training violations not in compliance with the above described permit conditions:

- i. Eight 242-A Evaporator personnel were found deficient in dangerous waste management training required by the Permit in accordance with Permit Condition II.C.1. Permit conditions require that personnel are trained and the documents maintained in accordance with Permit Condition II.C.2, 242-A Permit Chapter 8, and WAC 173-303-330 (1) (c).
- ii. (The) 242-A Evaporator Environmental Compliance Officer (ECO), was found deficient in Permit training required for the ECO position (Permit Table 8. 1). As the ECO, (he) supervised personnel also deficient in the Permit required training. [Permit Condition II C.2, Permit Chapter 8 and WAC 173-303-330 (1) (c)]
- iii. (The) previous 242-A Evaporator ECO, was found deficient in Permit training required for the ECO position (Permit Table 8.1) during the time period (he) was in the ECO position. As the 242-A Evaporator ECO, (he) supervised personnel also deficient in the Permit required training. [Permit Condition II. C.2, Permit Chapter 8 and WAC 173-303-330 (1) (c)]

**Corrective Measure:** Within 30-days of receipt of this letter, USDOE-ORP/WRPS must provide Ecology written verification that all 242-A Evaporator personnel have completed all permit required training identified in Permit Table 8.1 in the 242-A Evaporator’s Dangerous Waste Training Plan (DWTP) and Training Matrix. Copies of completed training records must be retained in the facility operating record in accordance with the Permit.”

### **Response:**

As required by the 242-A Evaporator Dangerous Waste Permit, Chapter 8, Condition II.C.2, the 242-A Evaporator all affected personnel have completed permit required training. The Washington River Protection Solutions LLC (WRPS) Operations, Training and Environmental management reviewed 242-A required training on March 26, 2010, to ascertain compliance with Table 8.1 and the Dangerous Waste Training Plan, TFC-PLN-07. All personnel were current for their training at that time. All personnel with training due to expire within the next 30 days were scheduled to attend and complete the required training. Any staff member who has not completed the required training will not be assigned duties linked to the training (2).

The training plans of staff assigned to 242-A have been reviewed to confirm compliance with Table 8.1 of the Permit and the Dangerous Waste Training Plan. This review confirmed that training requirements were consistent with assigned job responsibilities. The training plans for Nuclear Chemical Operators (NCO) recognize that different NCO jobs have different responsibilities for container management. As provided in the 242-A Evaporator Dangerous Waste Permit, Chapter 8, Section 8.3:

“The specific Hanford Facility personnel job title/position is correlated to the waste management duties. Waste management duties relating to WAC 173-303 are correlated to training courses to ensure training properly is assigned.”

Consequently, the requirement for container management training varies based upon the job responsibilities of the assigned NCO. Attachment 2 lists the assigned 242-A Evaporator staff, the required dangerous waste training for each position, and the training due date for each course. The following corrective actions have been taken to address the Washington State Department of Ecology’s (Ecology) stated Corrective Measure:

- 1) Staffing assignments have been confirmed to be consistent with the personnel job title/position as correlated to the waste management duties. Qualification requirements for 242-A NCOs, Shift managers, and Environmental staff have been reviewed and confirmed to assure training is consistent with job assignments. (Attachment 2)
- 2) A review was conducted to confirm that waste management training courses have been completed as required by the Dangerous Waste Training Plan and that required training is consistent with assignments for waste management duties. (Attachment 2)
- 3) A permit modification has been drafted for Chapter 8 of the 242-A Evaporator Dangerous Waste Permit to clarify the apparent ambiguity between the text of Section 8.3 and Table 8.1. The modification will recognize the different waste worker categories and require training that is appropriate for the job responsibilities. In addition, this change will align the 242-A Evaporator Dangerous Waste Permit with terminology used in the Dangerous Waste Training Plan. (Attachment 3)
- 4) WRPS has initiated a corrective action (PER #2010-0889) to update the “Dangerous Waste Training Plan” TFC-PLN-07 to more clearly define dangerous waste training requirements and improve consistency with the permit modifications. The Dangerous Waste Training Plan will be revised within 90 days following approval of the draft 242-A Evaporator permit modification.
- 5) The 242-A permit required training for the ECO position has been entered into the Training Department data base.
- 6) Training records are maintained electronically and are available to 242-A Evaporator management.

Specific deficiencies identified by Ecology in the Notice of Violation and accompanying inspection report have been addressed as follows:

- i. Six Evaporator NCOs identified in the inspection report have completed the dangerous waste management training consistent with their roles and responsibilities and with the 242-A Evaporator Resource Conservation and Recovery Act (RCRA) permit (Waste Segregation and Packaging - 350560).

Container management responsibilities are the duties of staff organizationally separate from those of 242-A Evaporator staff. Training records for Waste Management staff have been

reviewed and found to be current for Container Management. (Waste Management Services Surveillance and Inspection - 350166)

The 242-A Evaporator organization does not employ a "Shift" Technical Advisor. The position of "Shift" Technical Advisor is not known to be a required permit condition. Should that position be filled, all required training will be completed. The 242-A does employ a "Senior" Technical Advisor with responsibilities for administrative management of the 242-A budget, schedule, procurement, and records. These responsibilities are administrative in nature and do not require dangerous waste management training.

The Notice of Violation cites eight 242-A Evaporator personnel as deficient in dangerous waste training. WRPS has been able to correlate the seven staff positions above with assignments at the 242-A Evaporator. Other personnel identified by Ecology in the inspection report (WRPS Environmental Manager, Environmental Compliance Officer and Environmental Field Representative) provide matrix support but are not 242-A Evaporator staff.

- ii. The current WRPS ECO completed the permit required training in September 2009 within three months of assuming that role. Permit required training includes:
  - a. General Hanford Facility Training (Orientation Program 358001 and 3505040)
  - b. Contingency Plan Training (Emergency Hazards Checklist 357061 and 350540)
  - c. Emergency Coordinator Training (TOC Emergency Response Organization Facility Specific Training, 35E001)
  - d. Operations Training-General Waste Management (TOC Waste Handling, Segregation and Packaging, 350560)
- iii. The previous ECO resigned from WRPS prior to the inspection.

**2. Hanford Facility RCRA Permit, Dangerous Waste Portion, Revision 8C, Permit Condition I.C.3, WAC 173-303-830:**

"Except as provided otherwise by specific language in this Permit, the Permit modification procedures of WAC 173-303-830(2), (3), and (4) will apply to modifications or changes in design or operation of the Facility, or any modification or change in dangerous waste management practices covered by this Permit.

The 242-A Evaporator facility operated using a version of the Unit Permit Training Matrix not established through the Permit modification process. [Permit Condition I.C.3, and WAC 173-303-830]

**Corrective Measure:** Within 30-days of receipt of this letter, USDOE ORP/WRPS must complete and submit to Ecology a permit modification to address all changes to the training requirements in the 242-A Evaporator's DWTP and Training Matrix. The Permit modification process must follow the Permit and WAC 173-303-830."

**Response:**

A RCRA permit modification for Operating Unit 4, 242-A Evaporator, Chapter 8, has been drafted to address training requirements. The modification clarifies that individuals who are not performing duties of the Dangerous Waste Worker Category identified in Table 8.1 due to

reassignment, medical restriction, or other limiting factors do not require current training for that category. The draft permit modification was discussed with Washington State Department of Ecology staff on April 6, 2010. The draft is included in Attachment 3. Changes to the Dangerous Waste Training Plan will be discussed by DOE concurrent with Ecology's review of the draft permit modification.

As a point of clarification regarding Ecology concerns of a modified training matrix; an informal training matrix, using Table 8.1, was generated during the inspection to respond to Ecology questions. This was generated as a tool to provide Ecology inspectors with an understanding of how Permit training requirements are interpreted and implemented based upon job duties and was not intended to replace Table 8.1 of the Permit. In the revision to the dangerous waste permit training plan, flow-down of training requirements from the permit to job positions will be ensured.

**3. Hanford Facility RCRA Permit, Dangerous Waste Portion, Revision 8C, Permit Condition II.O.1, Permit Chapter 6 for Operating Unit #4 (242-A Evaporator), and WAC 173-303-320(2):**

"The Permittees will inspect the facility to prevent malfunctions and deterioration, operator errors, and discharges, which may cause or lead to the release of dangerous waste constituents to the environment, or threaten human health. Inspections must be conducted in accordance with Permit Condition II.O, 242-A Permit Chapter 6, and WAC 173-303-320(2).

The following are permit violations related to required inspections being conducted at the 242-A Evaporator:

- i. Permit Table 6.4 requires that an annual fire inspection of the 242-A Evaporator facility be conducted. Annual fire inspection documentation was not in the facility operating record or inspection log. [Permit Chapter 6 and WAC 173-303-320(2) (d)]
- ii. March 30 through April 5, 2009 facility inspection logs of the 242-A Evaporator Loading Room indicate daily inspections were not completed. The facility representative performing the inspection noted on the inspection log for each day that the Loading Room could not be inspected because a curtain was covering a view window that is used for conducting the inspection. The inspections are required to be performed daily according to the Permit.
- iii. Corrections to deficiencies were not documented in the inspection logs Ecology reviewed. Ecology identified many instances of this violation within the inspection log. Permit Condition II.O, 242-A Permit Chapter 6.2.6 and WAC 173-303-320 (2)(d) require that the log include 'the date and nature of any repairs or remedial action taken.'

**Corrective Measure:** Within 30-days of receipt of this letter, USDOE-ORP/WRPS must provide written documentation to Ecology verifying that the inspection violations described above are corrected and will meet the requirements of the Permit in the future. This can include the facility's corrective measures for maintaining the facility operating record in accordance with the Permit."

**Response:**

WRPS has completed an evaluation of the permit inspection criteria and the corresponding 242-A Evaporator inspection logs sheets. A permit modification has been drafted to address improvements. Revisions to the inspection forms are being developed and will be completed 90 days following approval of the permit modification. In addition, personnel briefings have been conducted that emphasized regulatory compliance expectations and documentation.

WRPS has initiated management reviews of the operator inspection log sheets to assure that corrective actions are identified for discrepancies, that the revised inspection process is being implemented, and to improve the quality and discipline of the process.

Specific deficiencies identified by Ecology have been addressed as follows:

- i) Records documenting future annual fire inspection records, as performed by the Fire Protection Engineer, will be available at 242-A Evaporator. Five years of historical Fire Protection Engineer inspection records will be added to the 242-A operating record. Where historical records do not meet the specific requirements of WAC 173-303-320 (2) (c), a statement attesting to the performance of compliant inspections will be added to the facility operating record.

A draft permit modification to Chapter 6 of the 242-A Evaporator Dangerous Waste Permit, has been prepared to address fire inspection requirements. This draft permit modification clarifies that the annual fire inspection is performed by the Fire Protection Engineer as a Deputy Fire Marshall for the Hanford Fire Department. Electronic copies of the annual fire inspection will be available in the 242-A Evaporator operating record.

- ii) The Load Out Room curtain is pulled horizontally across the upper portion of the load out room to control contamination spread from slurry sampling and select maintenance activities. This action is considered As Low As Reasonably Achievable for both radioactive and hazardous material contamination control. During those periods when the curtain is pulled, visual inspection of the loadout room cannot be performed from the viewing windows. As discussed with Ecology, the use of the contamination control curtain has been included in the permit modification to Chapter 6 of the 242-A Evaporator Dangerous Waste Permit.
- iii) Deficiencies identified during operator round inspections are noted and logged by the Operator on the round sheets. This was recognized by Ecology during the inspection. An equipment deficiency log is maintained in the 242-A control room, as required by Section 6.2.6 of the 242-A Evaporator Dangerous Waste Permit. Corrective actions are launched through one of several administrative processes including; computerized maintenance management system (TFCHAMPS) or Problem Evaluation Requests (PER). The equipment deficiency is tracked through reference in the corrective action system, including the corresponding date and nature of repairs.

**CONCERNS:**

1. "Ecology is concerned that the required permit training identified in the Permit Table 8.1 does not correlate with the training course titles on the 242-A Evaporator personnel's training records provided to Ecology. The courses completed by personnel that conduct waste

management duties at the 242-A Evaporator need to reflect the required courses in the Permit DWTP.

2. Ecology recommends the Permittees maintain documentation in the facility operating record of specific course titles or numbers corresponding to the written description of the type of introductory and continuing training requirements in the Permit DWTP described in Permit Condition II.C.2. Changes in this manner are not subject to the permit modification requirements of WAC 173-303-830.”

**Response:**

A permit modification will be requested for the Dangerous Waste Permit of Operating Unit 4, 242-A Evaporator, Chapter 8, to address training requirements. A draft is provided in Attachment 3. The draft modification permit language seeks to reconcile training requirements consistent with job assignments. In addition, the Dangerous Waste Training Plan, TFC-PLN-07 will be modified to clarify the training requirements of the draft permit modifications. Records of the completed training are maintained electronically and accessible to the 242-A Evaporator facility management.

3. “It took over a month for the Permittees to provide documentation to Ecology that the annual fire inspection of the 242-A Evaporator, required by Permit Table 6.4, was completed and documented. This length of time is considered beyond the ‘reasonable time’ required by WAC 173-303-380(3).”

**Response:**

WRPS and the U.S. Department of Energy, Office of River Protection will work with Ecology to assure that inspection protocol for the request and transmittal of inspection documents is understood and implemented. WRPS has initiated a corrective action [PER] to prepare inspection protocol training for Environmental Compliance staff.

Attachment 2  
10-ESQ-125  
(4 Pages)

Evidence of Training Verification

Data 26MAR2010

		General Hanford Training	Contingency Plan Training	Emergency Coord Trng	General Waste Management	Container Management	Tank System Management
Name	Job Title/Position	358001 350540	350540	031110	350560	350560	350340 350400 (1) 350402 (1)
<b>Nuclear Chemical Operator (NCO)</b>							
Airoldi, John H	Day-Shift NCO	3/2/2011 3/1/2011	3/1/2011	1/20/2011	3/1/2011	3/1/2011	12/15/2010 10/12/2011 Not Assigned
Barger, David L	B-Shift NCO	8/1/2010 7/16/2010	7/16/2010	7/22/2010	8/1/2010	8/1/2010	2/11/2012 7/2/2011 1/19/2011
Caraway, Edward R	T-Shift NCO	1/26/2011 1/19/2011	1/19/2011	2/25/2011	1/19/2011	1/19/2011	6/19/2010 7/2/2011 Not Assigned
Dabling, Warren S	D-Shift NCO	2/28/2011 2/27/2011	2/27/2011	6/10/2010	2/27/2011	2/27/2011	6/2/2010 3/19/2011 3/19/2011
Davis, Marshall J	T-Shift NCO	8/26/2010 8/25/2010	8/25/2010	12/9/2010	7/23/2010	7/23/2010	5/5/2010 6/25/2011 8/25/2010
Eubanks, Stan V	B-Shift NCO	5/20/2010 5/19/2010	5/19/2010	7/22/2010	5/19/2010	5/19/2010	12/11/2010 1/26/2012 1/18/2012
Friesz Jr, Roger R	D-Shift NCO	3/2/2011 3/1/2011	3/1/2011	1/20/2011	3/1/2011	3/1/2011	8/7/2010 1/13/2012 Not Assigned
Garcia, Roger A	Day-Shift NCO	3/7/2011 3/7/2011	3/7/2011	1/7/2011	1/5/2011	1/5/2011	12/3/2010 2/10/2012 2/10/2012
Grady, Kevin J	C-Shift NCO	9/2/2010 3/12/2011	3/12/2011	8/11/2010	9/2/2010	9/2/2010	7/14/2010 9/26/2010 9/26/2010
Greenough, Violet J	Day-Shift NCO	2/24/2011 2/23/2011	2/23/2011	12/1/2010	2/24/2011	2/24/2011	6/3/2010 12/2/2011 2/23/2011
Hammack, Alan G	A-Shift NCO	8/26/2010 8/26/2010	8/26/2010	1/13/2011	8/26/2010	8/26/2010	5/5/2010 5/25/2011 6/1/2011
Kelly, Lorin K	B-Shift NCO	2/10/2011 2/10/2011	2/10/2011	1/6/2011	2/10/2011	2/10/2011	9/23/2011 6/12/2011 Not Assigned

Meyer, David J	D-Shift NCO	1/9/2011 6/3/2010	6/3/2010	4/15/2010	1/29/2011	1/29/2011	1/14/2011 2/8/2011 2/8/2011
Mitchell, James A	C-Shift NCO	3/24/2011 7/24/2010	7/24/2010	8/11/2010	3/24/2011	3/24/2011	6/18/2011 10/9/2010 1/5/2011
Nearing, Timothy K	A-Shift NCO	12/30/2010 11/10/2010	11/10/2010	2/25/2011	12/30/2010	12/30/2010	4/15/2010 8/12/2011 Not Assigned
Phipps, Robert A	A-Shift NCO	6/30/2010 4/16/2010	4/16/2010	1/13/2011	6/30/2010	6/30/2010	7/1/2011 9/18/2010 9/18/2010
Pyle, Timothy A	T-Shift NCO	8/4/2010 7/27/2010	7/27/2010	7/29/2010	8/4/2010	8/4/2010	2/2/2012 9/1/2011 9/1/2011

Data 26MAR2010

		General Hanford Training	Contingency Plan Training	Emergency Coord Trng	General Waste Management	Container Management	Tank System Management
Name	Job Title/Position	358001 350540	350540		350560		
<b>Shift Technical Advisor</b>							
Vacant							

Data 26MAR2010

		General Hanford Training	Contingency Plan Training	Emergency Coord Trng	General Waste Management	Container Management	Tank System Management
Name	Job Title/Position	358001 350540	350540	35E001	350560		
<b>Shift Managers</b>							
Anderson, Rick A	B-Shift Senior Shift Manager	1/4/2011 2/20/2011	2/20/2011	5/13/2011	12/31/2010		Not Required
Andrews, Jeffrey E	D-Shift Senior Shift Manager	1/3/2011 1/3/2011	1/3/2011	5/5/2011	9/3/2010		Not Required
Johnson, Brian A	C-Shift Senior Shift Manager	1/14/2011 11/15/2010	11/15/2010	3/14/2011	10/6/2010		Not Required
Strasser, David W	T-Shift Senior Shift Manager	9/24/2010 9/23/2010	9/23/2010	5/16/2011	9/28/2010		Not Required
Wallgren, Carl B	A-Shift Senior Shift Manager	9/6/2010 3/11/2011	3/11/2011	5/16/2011	9/6/2010		Not Required

Data 26MAR2010

Data 26MAR2010		General Hanford Training	Contingency Plan Training	Emergency Coord Trng	General Waste Management	Container Management	Tank System Management
Name	Job Title/Position	358001 350540	350540	35E001	350560		
<b>Operations Engineers</b>							
Garrett, Mark S	Day-Shift 242A Shift Manager/OE	7/28/2010 4/6/2010	4/6/2010	5/15/2011	7/28/2010		Not Required
Gilles, David A	Day-Shift 242A Shift Manager/OE	8/26/2010 8/24/2010	8/24/2010	5/7/2011	8/26/2010		Not Required
Harrison, W Dale	C-Shift 242A Shift Manager/OE	7/27/2010 3/7/2011	3/7/2011	5/7/2011	7/27/2010		Not Required
Hurson, Patrick J	Day-Shift 242A Shift Manager/OE	2/8/2011 2/8/2011	2/8/2011	4/8/2011	2/8/2011		Not Required
Malhan, Rakesh	A-Shift 242A Shift Manager/OE	4/30/2010 3/8/2011	3/8/2011	5/19/2011	10/2/2010		Not Required
Raven, Rebecca P	Day-Shift 242A Shift Manager/OE	7/28/2010 7/28/2010	7/28/2010	5/4/2011	7/28/2010		Not Required
Treadway, Phillip L	T-Shift 242A Shift Manager/OE	3/25/2011 3/25/2011	3/25/2011	5/16/2011	3/25/2011		Not Required
Walker, Lewis M	Day-Shift 242A Shift Manager/OE	10/28/2010 10/28/2010	10/28/2010	5/5/2011	10/28/2010		Not Required

Data 26MAR2010

Data 26MAR2010		General Hanford Training	Contingency Plan Training	Emergency Coord Trng	General Waste Management	Container Management	Tank System Management
Name	Job Title/Position	358001 350540	350540	35E001	350560		
<b>Environmental Compliance Officer</b>							
Voogd, Jeffry A	Environmental Compliance Officer	5/12/2010 8/25/2010	8/25/2010	11/1/2010	9/2/2010		Not Required

Data 26MAR2010

Data 26MAR2010		General Hanford Training	Contingency Plan Training	Emergency Coord Trng	General Waste Management	Container Management	Tank System Management
Name	Job Title/Position	358001 350761	350761	031110	350560	035012	
<b>Waste Services Provider</b>							
Pascual, Mandrake F	Waste Designator	12/7/2010 12/7/2010	12/7/2010	12/2/2010	12/7/2010	10/29/2010	Not Required
Poeppel, Kathy A	Waste Designator	10/13/2010 9/21/2010	9/21/2010	6/9/2010	9/21/2010	4/24/2010	Not Required

Stamm,Joelle M	Waste Designator	5/27/2010 3/30/2011	3/30/2011	5/14/2010	5/27/2010	10/29/2010	Not Required
		358001 350761	350761	031110	350560	350166	
Beach,Melsa J	Waste Operations NCO	9/8/2010 9/8/2010	9/8/2010	7/11/2010	9/8/2010	10/12/2011	Not Required
Lanman,Lindy L	Waste Operations NCO	6/1/2010 5/28/2010	5/28/2010	4/15/2010	5/28/2010	8/7/2010	Not Required
Repp,Philip P	Waste Operations NCO	10/27/2010 10/27/2010	10/27/2010	4/1/2010	10/27/2010	8/17/2011	Not Required
Rowan,RaChelle R	Waste Operations NCO	7/23/2010 7/27/2010	7/27/2010	10/23/2010	7/29/2010	2/10/2012	Not Required
Smith,Richard T	Waste Operations NCO	7/23/2010 7/23/2010	7/23/2010	10/23/2010	7/29/2010	3/4/2012	Not Required
Thompson,Aaron W	Waste Operations NCO	7/23/2010 7/27/2010	7/27/2010	10/23/2010	7/29/2010	2/12/2012	Not Required
Thompson,Rick L	Waste Operations NCO	7/21/2010 7/21/2010	7/21/2010	11/4/2010	7/21/2010	5/29/2010	Not Required
Turner,Thomas M	Waste Operations NCO	2/9/2011 2/9/2011	2/9/2011	3/10/2011	2/9/2011	11/6/2011	Not Required
Workman, Frank D	Waste Operations NCO	3/17/2011 3/17/2011	3/17/2011	5/20/2010	3/17/2011	7/10/2010	Not Required
Wright,Bert D	Waste Operations NCO	1/27/2011 1/27/2011	1/27/2011	10/7/2010	1/27/2011	12/31/2010	Not Required

**Note** (1) Required for staff that has been assigned these duties

**Course Number**

**Course Title**

- 031110 24-HOUR HAZ WASTE TSD WORKER
- 035012 WASTE DESIGNATION QUAL
- 350166 TOC WMS SURV & INSP INIT QUAL
- 350340 TOC OPERATOR BASE CERT
- 350400 242A EVAPORATOR OPER-BACKSIDE
- 350402 242-A EVAPORATOR OPER - CERT
- 350540 242-A EVAPORATOR ORNT/FEHIC CB
- 350560 TOC WASTE HNDNG SEG & PKG INIT
- 350761 TF FAC ORIENT & FEHIC - CBT
- 358001 TOC HGET - CBT

**Attachment 3  
10-ESQ-125  
(20 Pages)**

**Draft Class 1 Modification, Quarter Ending 6/30/10, WA7890008967,  
Part III, Operating Unit 4, 242-A Evaporator  
(Not Containing OUO)**

**Hanford Facility RCRA Permit Modification Notification Forms**

**Part III, Operating Unit 4**

**242-A Evaporator**

Index

Page 2 of 27: OU-4 Permit Conditions  
Page 3 of 27: Chapter 4.0, Figure 4.3  
Page 4 of 27: Chapter 6.0, §6.2.1  
Page 5 of 27: Chapter 6.0, §6.2.2.2  
Page 6 of 27: Chapter 6.0, §6.2.2.3  
Page 7 of 27: Chapter 6.0, §6.2.3  
Page 8 of 27: Chapter 6.0, §6.2.6  
Page 11 of 27: Chapter 6.0, §6.3.3  
Page 12 of 27: Chapter 6.0, §6.4.4  
Page 13 of 27: Chapter 6.0, §6.5.1  
Page 14 of 27: Chapter 6.0, Table 6.1  
Page 15 of 27: Chapter 6.0, Table 6.2  
Page 16 of 27: Chapter 6.0, Table 6.4  
Page 25 of 27: Chapter 8.0, §8.2  
Page 26 of 27: Chapter 8.0, §8.3  
Page 27 of 27: Chapter 8.0, Table 8.1

Submitted by Co-Operator:

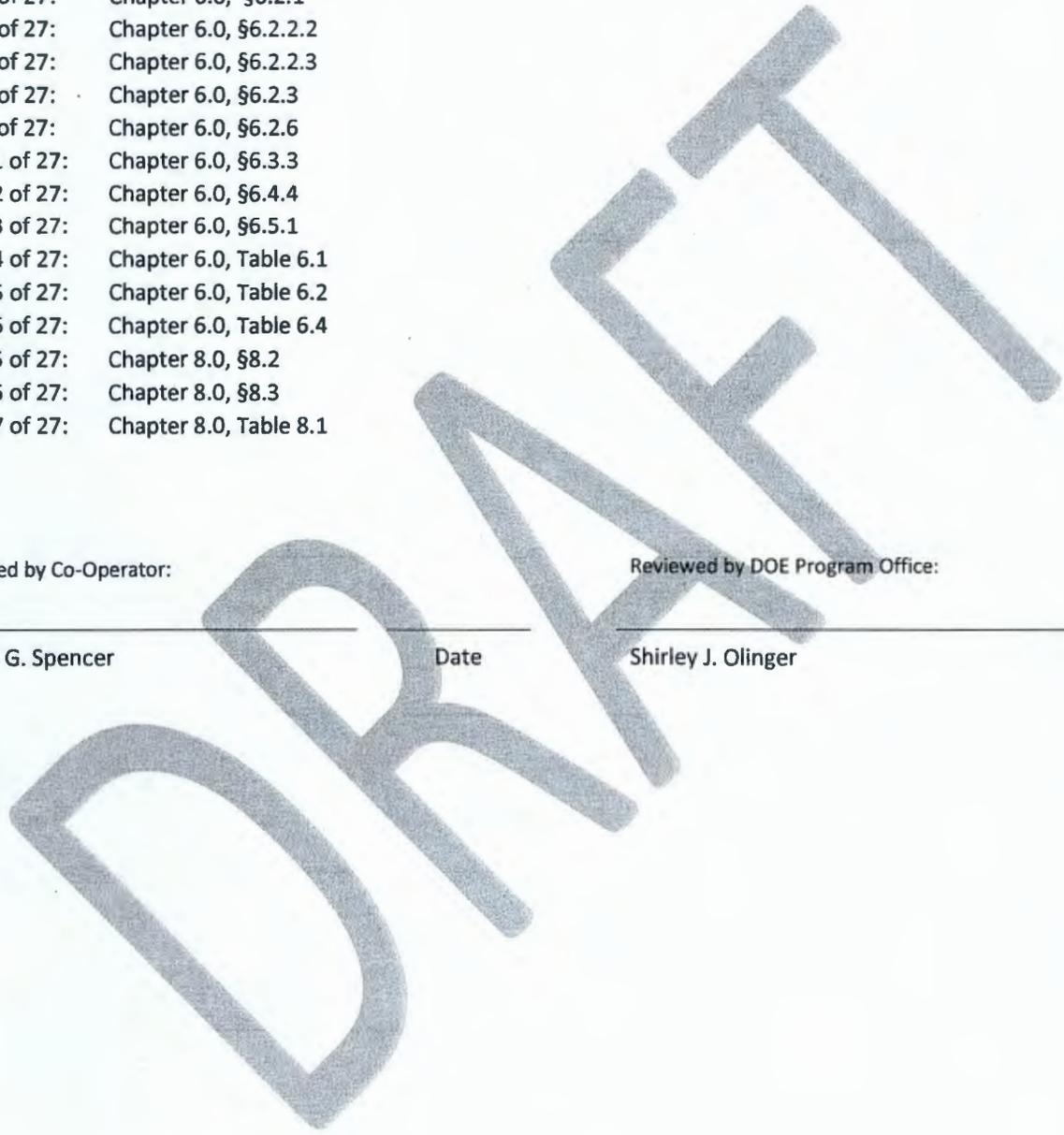
Reviewed by DOE Program Office:

Charles G. Spencer

Date

Shirley J. Olinger

Date



**Hanford Facility RCRA Permit Modification Notification Form**

Unit: <b>242-A Evaporator</b>	Permit Part <b>Part III, Operating Unit 4</b>
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Description of Modification:

Part III, OU-4: Replace file dated December 31, 2009, with file dated June 30, 2010

**OPERATING UNIT 4 UNIT-SPECIFIC CONDITIONS  
242-A Evaporator**

**UNIT DESCRIPTION**

The 242-A Evaporator is a mixed waste treatment and storage unit consisting of a conventional forced-circulation, vacuum evaporation system to concentrate mixed-waste solutions located in the 200 East Area.

This document sets forth the operating conditions for the 242-A Evaporator.

**III.4.A COMPLIANCE WITH UNIT SPECIFIC PERMIT CONDITIONS**

The Permittees shall comply with all requirements set forth in the Hanford Facility RCRA Permit (Permit) as specified in Permit Attachment 3, Permit Applicability Matrix, including all approved modifications. All chapters, subsections, figures, tables, and appendices included in the following unit-specific Permit Conditions are enforceable in their entirety.

In the event that the Part III-Unit-Specific Conditions for Operating Unit 4, 242-A Evaporator conflict with the Part I-Standard Conditions and/or Part II-General Facility Conditions of the Permit, the unit-specific conditions for Operating Unit 4, 242-A Evaporator prevail.

**CHAPTERS SPECIFIC TO OPERATING UNIT GROUP 4:**

- Chapter 1.0 Part A Form, dated October 1, 2008
- Chapter 2.0 Unit Description, dated August 2004
- Chapter 3.0 Waste Analysis Plan, dated September 30, 2007
- Chapter 4.0 Process Information, dated ~~December 31, 2009~~ June 30, 2010
- Appendix 4B Tank Integrity Assessment, dated December 31, 2002
- Chapter 5.0 Groundwater Monitoring, dated (not applicable)
- Chapter 6.0 Procedures to Prevent Hazards, dated ~~December 31, 2009~~ June 30, 2010 (also refer to Permit Attachment 33, §6.1, Security)
- Chapter 7.0 Contingency Plan, dated ~~March 31, 2009~~ June 30, 2010
- Chapter 8.0 Personnel Training, dated ~~September 30, 2007~~ June 30, 2010
- Chapter 11.0 Closure and Post Closure Requirements, dated December 31, 2005
- Chapter 12.0 Reporting and Recordkeeping (refer to Permit Attachment 33, Table 12.1, Reports and Records)

WAC 173-303-830 Modification Class	Class 1	Class 1 <sup>1</sup>	Class 2	Class 3
Please mark the Modification Class:	X			

Enter relevant WAC 173-303-830, Appendix I Modification citation number: A.1

Enter wording of WAC 173-303-830, Appendix I Modification citation:

A.1 General Permit Provisions, Administrative and informational changes

Modification Approved/Concur <input type="checkbox"/> Yes <input type="checkbox"/> Denied (state reason below) Reason for denial:	Reviewed by Ecology:
	G. P Davis _____ Date _____

**Hanford Facility RCRA Permit Modification Notification Form**

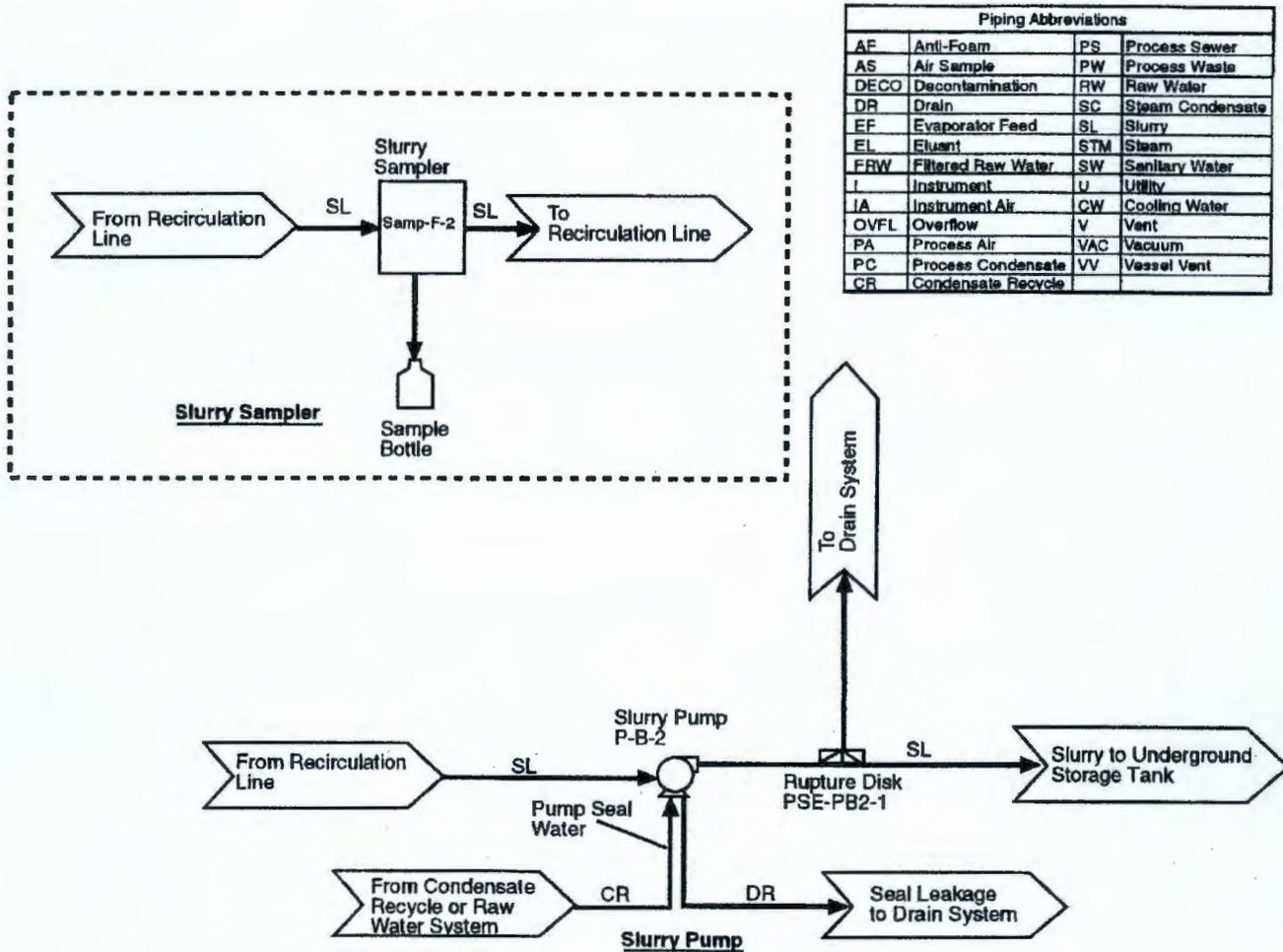
Unit:  
**242-A Evaporator**

Permit Part  
**Part III, Operating Unit 4**

Description of Modification:

Chapter 4.0, Figure 4.3: updated figure

**Figure 4.3. 242-A Evaporator Slurry System**



2G96080167.4

WAC 173-303-830 Modification Class

Please mark the Modification Class:

Class 1	Class 1	Class 2	Class 3
X			

Enter relevant WAC 173-303-830, Appendix I Modification citation number: A.1

Enter wording of WAC 173-303-830, Appendix I Modification citation:

A.1 General Permit Provisions, Administrative and informational changes

Modification Approved/Concur  Yes  Denied (state reason below)

Reason for denial:

Reviewed by Ecology:

G. P Davis

Date



Hanford Facility RCRA Permit Modification Notification Form				
Unit: <b>242-A Evaporator</b>	Permit Part <b>Part III, Operating Unit 4</b>			
<p><u>Description of Modification:</u> Chapter 6.0, §6.2.2.2:</p> <p><b>6.2.2.2 Visual Inspections</b></p> <p>Visual inspections of tanks and secondary containments are performed to check for leaks, signs of corrosion or damage, and malfunctioning equipment. Inspections also include housekeeping checks to ensure aisle space requirements are met. The following rooms containing dangerous waste are inspected:</p> <ul style="list-style-type: none"> <li>• Condenser room</li> <li>• Pump room</li> <li>• Hot equipment storage room</li> <li>• <del>Load out room</del></li> </ul> <p>In addition, the AMU <u>and load out rooms</u> <del>are</del> inspected when <del>hazardous materials are</del> dangerous waste is present in the room.</p> <p>The vapor liquid separator is located in the evaporator room, with a portion of the recirculation loop located in the pump room. Because of the high radiation dose in the evaporator room, visual inspections cannot be performed. Leaks in the evaporator room drain to the pump room sump; monitoring of the pump room sump instrumentation is performed to determine if leaks have occurred. Visual inspection of the portion of the recirculation loop located in the pump room is performed through the shielding window on the AMU mezzanine.</p>				
WAC 173-303-830 Modification Class	Class 1	Class <sup>1</sup> 1	Class 2	Class 3
Please mark the Modification Class:	X			
Enter relevant WAC 173-303-830, Appendix I Modification citation number: A.1 Enter wording of WAC 173-303-830, Appendix I Modification citation: A.1 General Permit Provisions, Administrative and informational changes				
Modification <input type="checkbox"/> Yes <input type="checkbox"/> Denied (state reason) <u>Reason for denial:</u>	Reviewed by Ecology:			
	G. P Davis			Date

<b>Hanford Facility RCRA Permit Modification Notification Form</b>				
Unit: <b>242-A Evaporator</b>	Permit Part <b>Part III, Operating Unit 4</b>			
<p><u>Description of Modification:</u> Chapter 6.0, §6.2.2.3:</p> <p><b>6.2.2.3 Leak Detectors</b></p> <p>The sample enclosures in the load out and hot equipment storage room have leak detectors for both the feed and slurry samplers. For information on these systems and their secondary containment, refer to Chapter 4.0, §4.1.4.</p> <p><u>During sampling or maintenance activities associated with the evaporator room, pump room, hot equipment storage room, or load out room, a radiological contamination control curtain may be deployed in the load out room to reduce the likelihood of contaminants reaching the environment through the load out door. When deployed, the contamination control curtain will limit visibility to the load out room from the shielding window on the AMU mezzanine while completing inspections. When this is the case, inspection forms will denote that the containment curtain has been deployed. Leaks to secondary containment in the evaporator room, pump room, hot equipment storage room, and load out room drain to the pump room sump. The sump high-level alarm serves as a leak detector for these rooms. For information on the rooms and their drain systems, refer to Chapter 4.0, §4.1.4.</u></p> <p>There are conductivity probe leak detectors installed in the secondary containment of the feed transfer line, slurry line, and drain lines connecting the 242-A Evaporator to AW Tank Farm. However, these detectors are considered part of the DST System.</p> <p>The PC-5000 transfer line may be continuously monitored during transfers by an electronic leak detection system (Chapter 4.0) or visually inspected at the encasement catch tank (TK-PC-101) in the LERF catch basin (242AL-43). The leak detection system alarms are monitored in the 242-A Evaporator Control Room on the Monitoring and Control System (§4.1.6.3.3). When necessary, visual inspections of the PC-5000 transfer line encasement are administratively controlled by the Shift Manager and occur at a minimum once every 24 hours during waste water transfers through the PC-5000 transfer line to ensure compliance with WAC 173-303-640(4)(c)(iii). Visual inspection for leaks from the PC-5000 transfer line are performed by 242-A Evaporator Operations, by looking for signs of any liquid not attributed to rain/precipitation at the encasement catch tank (TK-PC-101). If any liquid is observed the Shift Manager is notified to take corrective actions.</p>				
DRAFT				
WAC 173-303-830 Modification Class	Class 1	Class <sup>1</sup> 1	Class 2	Class 3
Please mark the Modification Class:	X			
Enter relevant WAC 173-303-830, Appendix I Modification citation number: A.1				
Enter wording of WAC 173-303-830, Appendix I Modification citation:				
A.1 General Permit Provisions, Administrative and informational changes				
Modification Reason for denial:	<input type="checkbox"/> Yes <input type="checkbox"/> Denied (state reason)	Reviewed by Ecology:		
		G. P Davis	Date	

<b>Hanford Facility RCRA Permit Modification Notification Form</b>				
Unit: <b>242-A Evaporator</b>	Permit Part <b>Part III, Operating Unit 4</b>			
<u>Description of Modification:</u> Chapter 6.0, §6.2.3:  <b>6.2.3 Storage of Reactive and Ignitable Wastes</b>  The Hanford Fire Department A Fire Protection Engineer performs annual fire inspections of the 242-A Evaporator. The assessment includes the date and time of the inspection, the name of the professional inspector, a notation of the observations made, and any remedial actions which were taken as a result of the inspection. <del>using a checklist developed specifically for facilities that handle dangerous and/or mixed waste. The checklist was developed from requirements in the Uniform Fire Code and the National Fire Protection Association code. A copy of the completed checklist is given to operating management to take remedial actions for any problems identified. The completed checklist fire protection facility assessment is included in the operating record and also is available from the Hanford Fire Department.</del>				
DRAFT				
WAC 173-303-830 Modification Class Please mark the Modification Class:	Class 1	Class <sup>1</sup> 1	Class 2	Class 3
	X			
Enter relevant WAC 173-303-830, Appendix I Modification citation number: A.1 Enter wording of WAC 173-303-830, Appendix I Modification citation: A.1 General Permit Provisions, Administrative and informational changes				
Modification Reason for denial:	<input type="checkbox"/> Yes <input type="checkbox"/> Denied (state reason)		Reviewed by Ecology:	
			G. P Davis	Date

Hanford Facility RCRA Permit Modification Notification Form				
Unit: <b>242-A Evaporator</b>	Permit Part <b>Part III, Operating Unit 4</b>			
<p><u>Description of Modification:</u> Chapter 6.0, §6.2.6:</p> <p><b>6.2.6 Schedule for Remedial Action for Problems Revealed</b></p> <p>If while performing a visual inspection (Table 6.1), a leak or spill is discovered, facility management responds immediately per Chapter 7.0, Contingency Plan. Action is taken to stop the leak and determine the cause. The waste is removed from the secondary containment within 24 hours or in a timely manner that prevents harm to human health and the environment. For spills that drain to the pump room sump, the sump must be <del>emptied</del><u>jetted</u>. The sump will be triple rinsed in accordance with WAC-173-303-160(2)(b) if the contents include acutely hazardous waste (WAC 173-303-040) or toxic extremely hazardous waste (WAC-173-303-100). Pesticides are not expected to enter this <del>system and rinsed three times</del> (Chapter 4.0, §4.1.5).</p> <p>If an alarm activates during inspections, an operator responds immediately and implements appropriate actions.</p> <p>If an inspection identifies equipment that is missing, damaged, or not operating properly, the operator records the problem on a deficiency log in the 242-A Evaporator control room. Repair work is prioritized by facility management to mitigate health and environmental risks to workers, maintain integrity of the facility, and prevent hazards to public health and the environment. The Hanford Fire Department repairs fire prevention equipment.</p>				
WAC 173-303-830 Modification Class	Class 1	Class 1 <sup>1</sup>	Class 2	Class 3
Please mark the Modification Class:	X			
Enter relevant WAC 173-303-830, Appendix I Modification citation number: A.1 Enter wording of WAC 173-303-830, Appendix I Modification citation: A.1 General Permit Provisions, Administrative and informational changes				
Modification <input type="checkbox"/> Yes <input type="checkbox"/> Denied (state reason) Reason for denial:	Reviewed by Ecology:			
	G. P Davis		Date	

**Hanford Facility RCRA Permit Modification Notification Form**

Unit: <b>242-A Evaporator</b>	Permit Part <b>Part III, Operating Unit 4</b>
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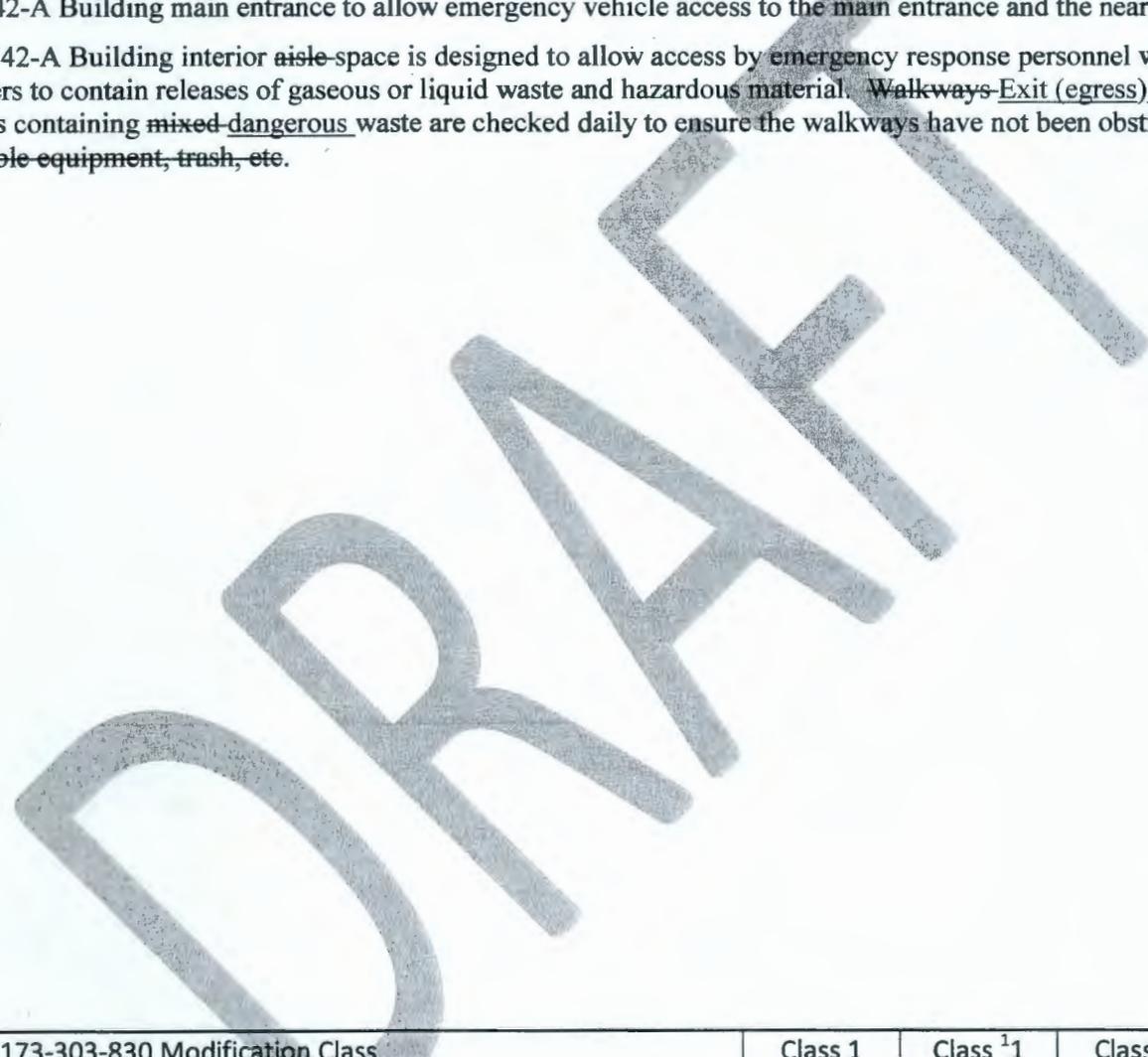
Description of Modification:

Chapter 6.0, §6.3.3:

**6.3.3 Aisle Spacing Requirement**

Sufficient aisle-space is maintained on the exterior of the 242-A Evaporator to allow access of personnel and equipment responding to fires, spills, or other emergencies. Unobstructed fire lanes run from Fourth Street and Canton Avenue to the 242-A Building main entrance to allow emergency vehicle access to the main entrance and the nearby fire hydrant.

The 242-A Building interior aisle-space is designed to allow access by emergency response personnel while maintaining barriers to contain releases of gaseous or liquid waste and hazardous material. Walkways-Exit (egress) paths in the rooms containing mixed-dangerous waste are checked daily to ensure the walkways have not been obstructed by portable equipment, trash, etc.



WAC 173-303-830 Modification Class	Class 1	Class 1	Class 2	Class 3
Please mark the Modification Class:	X			

Enter relevant WAC 173-303-830, Appendix I Modification citation number: A.1

Enter wording of WAC 173-303-830, Appendix I Modification citation:

A.1 General Permit Provisions, Administrative and informational changes

Modification Reason for denial: <input type="checkbox"/> Yes <input type="checkbox"/> Denied (state reason)	Reviewed by Ecology:
	G. P Davis _____ Date _____

Hanford Facility RCRA Permit Modification Notification Form					
Unit: <b>242-A Evaporator</b>	Permit Part <b>Part III, Operating Unit 4</b>				
<p><u>Description of Modification:</u> Chapter 6.0, §6.4.4.:</p> <p><b>6.4.4 Equipment and Power Failures</b></p> <p>Backup power is provided by a diesel generator. The diesel motor starts automatically on loss of electrical power and has sufficient fuel to operate the generator, <u>if needed</u>, to safely shut down the evaporator process. An uninterruptible power supply system also is provided to allow continued operation of the MCS computer to ensure uninterrupted monitoring until the <u>emergency-backup</u> generator is fully on line.</p> <p>The 242-A Evaporator is designed to mitigate the effects of failure of a major piece of equipment. In general, the evaporator process can be shut down and the vapor liquid separator gravity drained to the feed tank, 241-AW-102, in the event of equipment failure. The process condensate tank, TK-C-100, is designed to overflow to feed tank 241-AW-102. This mitigates failure of the process condensate pump used to transfer the process condensate to LERF.</p> <p>Response to equipment and power failures are discussed in more detail in Chapter 7.0, Contingency Plan.</p>					
WAC 173-303-830 Modification Class		Class 1	Class <sup>1</sup> 1	Class 2	Class 3
Please mark the Modification Class:		X			
Enter relevant WAC 173-303-830, Appendix I Modification citation number: A.1 Enter wording of WAC 173-303-830, Appendix I Modification citation: A.1 General Permit Provisions, Administrative and informational changes					
Modification Reason for denial: <input type="checkbox"/> Yes <input type="checkbox"/> Denied (state reason)		Reviewed by Ecology:			
		G. P Davis		Date	

<b>Hanford Facility RCRA Permit Modification Notification Form</b>				
Unit: <b>242-A Evaporator</b>	Permit Part <b>Part III, Operating Unit 4</b>			
<p><u>Description of Modification:</u> Chapter 6.0, §6.5.1:</p> <p><b>6.5.1 Precautions to Prevent Ignition or Reaction of Ignitable or Reactive Waste</b></p> <p>Administrative procedures are designed to prevent the ignition or reaction of waste at the 242-A Evaporator. The precautions include the following.</p> <ul style="list-style-type: none"> <li>• Analysis is performed on candidate waste in the DST System to check that there are no exothermic reactions when the waste is heated and that there will be no adverse affects due to mixing the contents of different waste tanks in the feed tank and evaporator vessel (refer to Chapter 3.0, for details on waste analysis).</li> <li>• Sample analysis of the candidate waste in the DST System includes a surface sample to identify the presence of a separable organic phase that might be ignitable. If a separate organic phase is detected, the waste solution level in the feed tank is maintained above 2.54 meters to prevent transfer of the organic phase to the 242-A Evaporator.</li> <li>• The condensate tank, C-100, is equipped with instrumentation to detect the presence of a separable organic phase. If a separate organic phase is detected, the tank is allowed to overflow, transferring the organic phase to the feed tank, 241-AW-102.</li> <li>• The condensate tank, C-100 is overflowed to the DST System <del>following</del> <u>during</u> each campaign to prevent the possibility of accumulating immiscible organics in the condensate waste tank.</li> <li>• The vapor liquid separator and the condensate tank are drained and flushed before any welding is performed.</li> <li>• Administrative safety controls have been established to control the use and quantities of combustibles materials, fuels, and gases. Hot work activities such as cutting, welding, and brazing are administratively controlled as part of the industrial safety program.</li> </ul>				
DRAFT				
WAC 173-303-830 Modification Class	Class 1	Class <sup>1</sup> 1	Class 2	Class 3
Please mark the Modification Class:	X			
Enter relevant WAC 173-303-830, Appendix I Modification citation number: A.1				
Enter wording of WAC 173-303-830, Appendix I Modification citation:				
A.1 General Permit Provisions, Administrative and informational changes				
Modification Reason for denial: <input type="checkbox"/> Yes <input type="checkbox"/> Denied (state reason)		Reviewed by Ecology:		
		G. P Davis		Date

**Hanford Facility RCRA Permit Modification Notification Form**

Unit:  
**242-A Evaporator**

Permit Part  
**Part III, Operating Unit 4**

Description of Modification:  
Chapter 6.0, Table 6.1:

**Table 6.1. Visual Inspection Schedule for Tanks, Piping, and Rooms**

Item	Inspection	Frequency <sup>1</sup>	Responsible organization	Comments
<b>Tank and Piping Inspection</b>				
Condensate tank and piping	Inspect tank and piping for leaks <u>or</u> , corrosion, <u>or</u> wear.	Daily	Operations	
<b>Room Inspections</b>				
AMU room	<ul style="list-style-type: none"> <li>Inspect tanks and piping for leaks <u>or</u>, corrosion, <u>or</u> wear.</li> <li>Inspect floor for spills or damage.</li> <li>Inspect for equipment malfunctions.</li> <li>Inspect for housekeeping/aisle space.</li> </ul>	Daily <sup>2</sup>	Operations	
Pump room	<ul style="list-style-type: none"> <li>Inspect piping for leaks <u>or</u>, corrosion, <u>or</u> wear.</li> <li>Inspect floor for spills or damage.</li> <li>Inspect for equipment malfunctions.</li> <li>Inspect for housekeeping.</li> <li>Inspect-Monitor pump room sump for overflow.</li> </ul>	Daily <sup>3</sup>	Operations	Use viewing window in AMU room to perform inspection.
Load-out and hot Hot equipment storage room	<ul style="list-style-type: none"> <li>Inspect piping for leaks <u>or</u>, corrosion, <u>or</u> wear.</li> <li>Inspect-Monitor pump room sumps and inspect floor for spills or damage.</li> <li>Inspect for housekeeping/ aisle space.</li> </ul>	Daily <sup>3</sup>	Operations	Use viewing window in AMU room to perform inspection.
Load out/ Loading room	<ul style="list-style-type: none"> <li>Inspect for housekeeping/ aisle space.</li> <li>Monitor drains.</li> </ul>	Daily <sup>2,3,4</sup>	Operations	Use viewing window in AMU room to perform inspection.
Condenser room	<ul style="list-style-type: none"> <li>Inspect tanks and piping for leaks <u>or</u>, corrosion, <u>or</u> wear.</li> <li>Inspect floors for spills or damage.</li> <li>Inspect for equipment malfunctions.</li> <li>Inspect for housekeeping/ aisle space.</li> </ul>	Daily	Operations	
IX column <sup>5,6</sup> room	<ul style="list-style-type: none"> <li>Inspect piping for leaks <u>or</u>, corrosion, <u>or</u> wear.</li> <li>Inspect floor for spills or damage.</li> </ul>	Daily <sup>6</sup>	Operations	Surveillance is required only when mixed waste is present in the piping.

<sup>1</sup> Continuously: an operator must be present in the control room to respond to alarms when processing waste

Daily: at least every 24 hours

Weekly: at least every 7 days

Monthly: at least every 31 days

Biannually: at least every 184 days

Annually: at least every 365 days

<sup>2</sup>When dangerous waste is present

<sup>3</sup>Use viewing window in AMU room to perform inspection

<sup>4</sup>Denote use of contamination control curtain when deployed

<sup>5</sup> IX column was removed in 2003. The remaining piping has been drained and isolated

<sup>6</sup> Surveillance is only required if the piping is returned to service and dangerous waste is present/reintroduced to the piping

WAC 173-303-830 Modification Class

Please mark the Modification Class:

Class 1	Class <sup>1</sup> 1	Class 2	Class 3
X			

Enter relevant WAC 173-303-830, Appendix I Modification citation number: A.1

Enter wording of WAC 173-303-830, Appendix I Modification citation:

A.1 General Permit Provisions, Administrative and informational changes

Modification Reason for denial:  Yes  Denied (state reason)

Reviewed by Ecology:

G. P Davis

Date

**Hanford Facility RCRA Permit Modification Notification Form**

Unit:  
**242-A Evaporator**

Permit Part  
**Part III, Operating Unit 4**

Description of Modification:

Chapter 6.0, Table 6.2:

**Table 6.2. Inspection Schedule of Safety, Security, and Emergency Equipment**

Item	Inspection	Frequency <sup>1</sup>	Responsible organization	Comments
<b>Security</b>				
Building external doors	Verify external doors are closed and locked <sup>2</sup>	Daily	Operations	Entrances to office areas are allowed to be unlocked.
Posted warning signs	Verify signs are present, legible, and visible at 7.6 meters.	Weekly	Operations	
Outdoor lighting	Verify outdoor lighting is sufficient.	Weekly	Operations	
<b>Communications</b>				
Crash alarm telephone	Verify crash alarm telephone is operable.	Monthly	Operations	
Emergency sirens	Perform functional check to verify operability.	Monthly	Operations	
Radios	Verify radios are operable and batteries are charged.	Monthly	Operations	
Telephones	Verify telephones are operable.	Quarterly	Operations	
Intercom/public address system	Verify systems are working properly.	Quarterly	Operations	
<b>Emergency Equipment</b>				
Safety showers/ eyewash station	Verify safety showers and eyewash station are operable.	Monthly	Operations	
Emergency lanterns/lighting	Verify emergency lanterns are operable.	Monthly	Maintenance	
Fire extinguishers	Verify fire extinguishers are in their proper location with no signs of tampering.	Monthly	Operations	
Spill response kit	Verify all equipment spill kit is present (from checklist in kit) with no signs of tampering.	Monthly	Operations	
Self-contained breathing apparatus (SCBA)	Verify shelf life of SCBA is current, no signs of tampering.	Monthly	Operations	
Personal protective clothing	Verify availability sufficient stock of clothing is available.	Weekly	Operations	
Full-face Respirators	Verify availability and respirator shelf life are current and sufficient stock is available.	Monthly	Operations	

<sup>1</sup>Continuously: an operator must be present in the control room to respond to alarms

Daily: at least every 24 hours

Weekly: at least every 7 days

Monthly: at least every 31 days

Quarterly: at least every 124 days

Biannually: at least every 184 days

Annually: at least every 365 days

<sup>2</sup>Entrances to office areas are allowed to be unlocked

WAC 173-303-830 Modification Class Please mark the Modification Class:	Class 1	Class <sup>1</sup> 1	Class 2	Class 3
		X		

Enter relevant WAC 173-303-830, Appendix I Modification citation number: WAC 173-303-830(3)(d)(i)

Enter wording of WAC 173-303-830, Appendix I Modification citation:

Other modifications: The Permittee requests that the modification be classified and reviewed as a Class <sup>1</sup>1.

Modification  Yes  Denied (state reason)

Reason for denial:

Reviewed by Ecology:

G. P Davis

Date



**Hanford Facility RCRA Permit Modification Notification Form**

Unit:  
**242-A Evaporator**

Permit Part  
**Part III, Operating Unit 4**

Description of Modification:

Chapter 8.0, §8.2:

**8.2 DESCRIPTION OF TRAINING DESIGN**

Proper design of a training program ensures personnel who perform duties on the Hanford Facility related to WAC 173-303-330(1)(d) are trained to perform their duties in compliance with WAC 173-303. Actual job tasks, referred to as duties, are used to determine training requirements. The first step taken to ensure Hanford Facility personnel have received the proper training is to determine and document the waste management duties by job title/position. The second step compares waste management duties to general waste management unit training curriculum. If general waste management unit training curriculum does not address the waste management duties, the training curriculum is supplemented and/or on-the-job training is provided. The third step summarizes the content of a training course necessary to ensure that the training provided to each job title/position addresses associated waste management duties. The last step is to assign training curriculum to Hanford Facility personnel based on the previous evaluation and actual duties assigned. The training plan documentation contains this process.

Waste management duties include those specified in Section 8.1 as well as those contained in WAC 173-303-330(1)(d). Training elements of WAC 173-303-330(1)(d) applicable to the 242-A Evaporator operations include the following:

- Procedures for using, inspecting, repairing, and replacing emergency and monitoring equipment
- Key parameters for automatic waste feed cut-off systems
- Communications or alarm systems
- Response to fires or explosions
- Shutdown of operations.

Hanford Facility personnel who perform these duties receive training pertaining to their duties. The training plan documentation described in Section 8.3 contains specific information regarding the types of training Hanford Facility personnel receive based on the outline in Section 8.1.

WAC 173-303-830 Modification Class Please mark the Modification Class:	Class 1	Class 1 <sup>1</sup>	Class 2	Class 3
	X			

Enter relevant WAC 173-303-830, Appendix I Modification citation number: A.1

Enter wording of WAC 173-303-830, Appendix I Modification citation:

A.1 General Permit Provisions, Administrative and informational changes

Modification  Yes  Denied (state reason  
Reason for denial:

Reviewed by Ecology:

G. P Davis

Date

**Hanford Facility RCRA Permit Modification Notification Form**

Unit:  
**242-A Evaporator**

Permit Part  
**Part III, Operating Unit 4**

Description of Modification:

Chapter 8.0, §8.3:

**8.3 DESCRIPTION OF TRAINING PLAN**

In accordance with Permit Condition II.C.3, the unit-specific portion of the Hanford Facility Dangerous Waste permit application must contain a description of the training plan. Training plan documentation is maintained outside of the Hanford Facility Dangerous Waste Part B permit application and the Permit. Therefore, changes made to the training plan documentation are not subject to the Permit modification process. However, the training plan documentation is prepared to comply with WAC 173-303-330(2).

Documentation prepared to meet the training plan consists of hard copy and/or electronic media as provided by Permit Condition II.C.1. The training plan documentation consists of one or more documents and/or a training database with all the components identified in the core document.

A description of how training plan documentation meets the three items in WAC 173-303-330(2) is as follows:

1. -330(2)(a): *The job title, job description, and name of the employee filling each job. The job description must include requisite skills, education, other qualifications, and duties for each position.*

Description: The specific Hanford Facility personnel job title/position is correlated to the waste management duties. Waste management duties relating to WAC 173-303 are correlated to training courses to ensure training is properly assigned.

~~Only names~~ A listing of Hanford Facility personnel who carry out job duties relating to TSD unit waste management operations at the 242-A Evaporator are maintained. ~~Individuals who are not performing duties of the Dangerous Waste Worker Category identified in Table 8.1 due to reassignment, medical restriction, or other limiting factors do not require current training for that category. These individuals must complete the required training for the Dangerous Waste Worker Category prior to resuming duties associated with that category. Names are maintained within the training plan documentation. A list of Hanford Facility personnel assigned to the 242-A Evaporator is available upon request.~~

Information on requisite skills, education, and other qualifications for job titles/positions are addressed by providing a reference where this information is maintained (e.g., human resources). Specific information concerning job title, requisite skills, education, and other qualifications for personnel can be provided upon request.

2. -330(2)(b): *A written description of the type and amount of both introductory and continuing training required for each position.*

Description: In addition to the outline provided in Section 8.1, training courses developed to comply with the introductory and continuing training programs are identified and described in the training plan documentation. The type and amount of training is specified in the training plan documentation as shown in Table 8.1.

3. -330(2)(c): *Records documenting that personnel have received and completed the training required by this section. The Department may require, on a case-by-case basis, that training records include employee initials or signature to verify that training was received.*

Description: Training records are maintained consistent with Attachment 33, Chapter 8.0, Section 8.4.

WAC 173-303-830 Modification Class Please mark the Modification Class:	Class 1	Class 1 <sup>1</sup>	Class 2	Class 3
	X			

Enter relevant WAC 173-303-830; Appendix I Modification citation number: A.1

Enter wording of WAC 173-303-830, Appendix I Modification citation:

A.1 General Permit Provisions, Administrative and informational changes

Modification  Yes  Denied (state reason  
Reason for denial:

Reviewed by Ecology:

G. P Davis

Date

**Hanford Facility RCRA Permit Modification Notification Form**

Unit:  
**242-A Evaporator**

Permit Part  
**Part III, Operating Unit 4**

Description of Modification:  
Chapter 8.0, Table 8.1:

**Table 8.1. 242-A Evaporator Training Matrix**

		Training Category					
Attachment 33 Chapter 8 Training Category		General Hanford Facility Training	Contingency Plan Training	Emergency Coordinator Training	Operations Training		
Operating Unit 4: 242A Evaporator Dangerous Waste Training Plan (TFC-PLN-07) implementing category Dangerous Waste Worker Categories <sup>1</sup>		Orientation Program (Tank Farm and 242-A Evaporator)	Emergency Hazards Check List	Building Emergency Coordinator Training	General Waste Management (handling, segregation, & packaging)	Container Management	Tank System Management
Job Title/Position	Dangerous Waste Worker Categories						
Nuclear Chemical (Operators)	Waste Worker	X	X	X <sup>2</sup>	X	X <sup>2</sup>	X <sup>2</sup>
Shift Technical Advisor (STAs)	Waste Worker Supervisor/ Manager	X	X		X		
Shift Manager (SMs)	Waste Worker Supervisor/ Manager	X	X	X <sup>2</sup>	X		
Operational Engineer (OEs)	Waste Worker Supervisor/ Manager	X	X	X	X		
Environmental Compliance Officer	Waste Worker Supervisor/ Manager	X	X	X	X		
Waste Service Provider	Advanced Waste Worker	X	X	X <sup>2</sup>	X	X <sup>2</sup>	
Building Emergency Director		X	X	X <sup>2</sup>			

<sup>1</sup>Dangerous Waste Worker categories are defined in the Tank Operations Contractor Dangerous Waste Training Plan.(TFC-PLN-07 current revision)

<sup>1</sup>Dangerous Waste Worker categories are defined in the Tank Operations Contractor Dangerous Waste Training Plan (TFC-PLN-07 current revision)

<sup>2</sup>Training received is commensurate with the duties performed. Individuals in this category who do not perform these duties are not required to receive this training.

WAC 173-303-830 Modification Class

Please mark the Modification Class:

Class 1	Class <sup>1</sup> 1	Class 2	Class 3
	X		

Enter relevant WAC 173-303-830, Appendix I Modification citation number: A.8

Enter wording of WAC 173-303-830, Appendix I Modification citation:

A.8 General Permit Provisions, Changes to remove permit conditions that are no longer applicable.

Modification  Yes  Denied (state reason)

Reason for denial:

Reviewed by Ecology:

G. P Davis

Date

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DRAFT

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**Hanford Facility RCRA Permit Modification  
Part III, Operating Unit 4  
242-A Evaporator**

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Remove and replace the following sections for Part III, Operating Unit 4:

- Permit Conditions dated December 31, 2009 with Permit Conditions dated June 30, 2010
- Chapter 4 dated December 31, 2009 with Permit Conditions dated June 30, 2010
- Chapter 6 dated December 31, 2009 with Permit Conditions dated June 30, 2010
- Chapter 8 dated December 31, 2009 with Permit Conditions dated June 30, 2010

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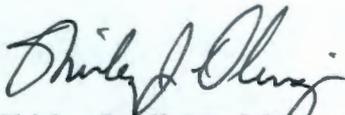
DRAFT

Ms. Jane A. Hedges  
10-ESQ-125

-2-

APR 14 2010

If you have any questions, please contact either of us, or your staff may contact  
Ms. Lori A. Huffman, Director, Environmental Compliance Division, (509) 376-0104, or  
Mr. Phil E. Peistrup, WRPS, (509) 372-9171.

  
Shirley J. Olinger, Manager  
Office of River Protection

  
C. G. Spencer  
President and Project Manager  
Washington River Protection Solutions LLC

ESQ:LAH

Attachments (3)

cc w/attachs:

S. G. Harris, CTUIR  
K. A. Conaway, Ecology  
G. P. Davis, Ecology  
J. B. Price, Ecology  
K. Wold, Ecology  
J. L. Boller, EPA  
D. A. Faulk, EPA  
S. L. Leckband, HAB  
K. A. Peterson, MSA  
G. P. Bohnee, NPT  
K. G. Niles, ODOE  
C. E. Clark, RL  
T. C. McKarns, RL  
S. R. Weil, RL  
J. C. Allen-Floyd, WRPS  
F. Beranek, WRPS  
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A. B. Dunning, WRPS  
L. D. Garcia, WRPS  
W. L. Gaydosh, WRPS  
S. D. Hyman, WRPS  
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P. E. Peistrup, WRPS  
T. R. Reynolds, WRPS  
S. M. Sax, WRPS  
J. A. Voogd, WRPS  
R. Jim, YN

Administrative Record (WTP H-0-8)  
BNI Correspondence  
Environmental Portal, LMSI  
WRPS Correspondence