

Mr. Charles E. Findley, et al.

-2-

February 12, 1991

If you have any questions regarding the enclosed NOD response table or associated draft text, please contact Mr. C. E. Clark of the U.S. Department of Energy-Richland Operations Office on (509) 376-9333, or Ms. C. J. Geier of Westinghouse Hanford Company on (509) 376-2237.

Sincerely,

R. D. Izatt

R. D. Izatt, Director
Environmental Restoration Division
Richland Operations Office

ERD:CEC

R. E. Lerch

R. E. Lerch, Manager
Environmental Division
Westinghouse Hanford Company

Enclosures:

1. NOD Response Table
2. Proposed Text Revisions

cc w/o encl.:

P. T. Day, EPA

R. E. Lerch, WHC

NOD Response Table

91121030849

9 1 1 2 1 7 3 0 3 5 0

THE 616 NONRADIOACTIVE DANGEROUS WASTE
STORAGE FACILITY NOD RESPONSE TABLE (REV. 1)
(UNRESOLVED COMMENTS)

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| No. | Comment/Response | Ecology Concurrence |
|-----|---|------------------------|
| 38. | <p>Page 6-5, Section 6.3.1.3. This section outlines the types of available emergency equipment but not the exact inventory.</p> <p><u>Ecology Requirement:</u> Please provide the inventory and locations of all emergency equipment. DOE-RL/WHC Response No. 1: A reference to Chapter 7.0, Section 7.5.3, will be made.</p> <p><u>Ecology Response No. 1:</u> The information given in Chapter 7.0 does not give a comprehensive inventory of available emergency equipment nor does it give the storage locations. This reference will not provide the information requested. Provide the inventory and locations of all emergency equipment as required under WAC 173-303-806(4)(a)(vii). DOE-RL/WHC Response No. 2: The list of equipment is included in the actual 616 NRDWSF emergency plan included as Appendix 7A. The text has been modified to include a reference to Appendix 7A.</p> <p><u>Ecology Response No. 2:</u> Appendix 7A. The 616 NRDWSF permit application has a table of emergency equipment giving the item, location, and capability. This table is very poorly reproduced and is almost illegible. Additionally, the items listed do not appear to be adequate for protection of personnel in an emergency response. For example, the respiratory protection equipment consists of dust masks and some, "equipment for radioactive airborne contamination." The amounts and sizes of emergency equipment is not given. This table does not fulfill the requirements of WAC 173-303-806(4)(a)(vii).</p> <p><u>Ecology Requirement:</u> Replace this table with a legible table that duplicates the information on this table and also states the exact inventories in terms of numbers, sizes, locations, and descriptions of the safety equipment. For example, each item in the 'Emergency Monitoring Kit' should be listed separately. Evaluate and revise this list as necessary so that personnel responding to an emergency situation will be adequately protected.</p> <p>DOE-RL/WHC Response No. 3: A legible copy of Table 1, Identification and Description of Emergency Equipment, will be included. Table 1 identifies emergency equipment in the 616 NRDWSF. The reference to the 'Emergency Monitoring Kit' has been deleted because it is not in the 616 NRDWSF and is not applicable for any expected emergency response. The minimum quantities of protective equipment maintained in the 616 NRDWSF have been added to Table 1. Responses requiring additional respiratory protection would be handled by the appropriate Hanford Site emergency response personnel, as indicated in Section 6.5.1 of the Building Emergency Plan. This information fulfills the requirements of WAC 173-303-806(4)(a)(ii) to comply with WAC 173-303-350.</p> | |

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Ecology
Concurrence

No. _____ Comment/Response _____

Ecology Response No. 3: The proposed table remains inadequate. The following must be elaborated:

- Dust Masks--Specify what types of dust these masks can provide adequate protection against.
- Chemical Resistant Gloves--Specify what types of materials these gloves resist. Give breakthrough times and transmissivity rates. This information may be provided in another table.
- Nonsparking Tools--State the tools referred to by "etc."
- Spill Control Kit--State the types and capabilities instead of, "Assorted types in boxes." for example, "mercury spill kit, 1 lb absorptive capability" would be adequate.

In a number of cases, quantities of supplies are uncertain. Describe the amounts clearly. In addition, give rationale why the building does not have a SCBA on hand for immediate emergency responses.

DOE-RL/WHC Response No. 4: The table has been revised to indicate only the equipment used in an emergency response within the 616 NRDWSF. Additional materials occasionally may be in the 616 NRDWSF for use in daily operations or for a chemical response at other locations. The specific changes are as follows.

Dust masks have been deleted from the list because as indicated, the masks actually are used only for nuisance type dusts and are not actually used for emergency response.

To more accurately reflect the actual use of each glove type, the chemical resistant gloves section of Table 1 has been replaced with the following information. The information identifies, describes, and indicates the glove type.

• Solvent Resistant Gloves*

10 pair minimum--either viton, butyl, nitrile, neoprene, or equivalent.

Provide protection for hands when exposed to solvents, alcohols, and/or water based solutions.

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| | <ul style="list-style-type: none">• <u>Corrosive Material Gloves*</u> 10 pair minimum—either neoprene, nitrile, polyvinyl chloride, or equivalent Provide protection for hands when exposed to corrosive materials.• <u>Response Gloves*</u> 20 pair minimum—either norfoil, silver shield, or equivalent. Provide protection for hands when exposed to an undetermined chemical or a wide variety of toxic/hazardous materials. May be worn over other chemical resistant gloves for additional protection.• <u>Abrasion Resistant Gloves</u> 4 pair minimum—leather or equivalent. Provide abrasion/cut/puncture protection for hands when handling containers, tools, etc. * Glove breakthrough times for specific chemical exposures must be reviewed and evaluated before use. 'Nonsparking' Tools have been revised to indicate those tools maintained in the building for use in managing containers of flammable material. These tools are now listed as one adjustable wrench, one bung wrench, and one shovel. An additional category for other tools has been added. These tools include a phillips screwdriver, slotted screwdriver, and crowbar and hammer for use when managing wooden containers. 'Spill Control Kits' have been deleted from the list because any materials for 616 NRWWSF personnel response already are listed under other spill control and protective equipment. Any additional spill control equipment would be supplied by the emergency response organization that would be contacted as specified in Section 6.5 of the 616 Building Emergency Plan. | |

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Quantities of supplies have been specified as the minimum to be maintained in the building. Each of the items in the table have been reviewed and revised as necessary to reflect the minimum quantity that must be maintained in case of an emergency. The listing of the portable eyewash station in the receiving area has been deleted because it is not required and a permanent eyewash/safety shower is provided in the Packaging and Sampling room. The reference to waterproof coveralls has been revised by specifying chemical resistant coveralls to more accurately reflect the function of the coveralls. The reference to acid suits also has been deleted because these suits are not intended for emergency response by the 616 NRDWSF personnel.

The final statement in the NOD comment 38 asks for the rationale on why the building does not have an SCBA on hand for immediate emergency response. As indicated in the emergency plan (Section 6.5), any spill that requires an emergency response is handled by the building emergency director and the emergency response organization when within their capabilities. For potential releases necessitating use of SCBA and other equipment, additional assistance is requested from the Fire Department HAZMAT team. The HAZMAT team has personnel appropriately trained in the use of SCBA and other equipment for use in responding to emergency situations requiring the use of this equipment. The HAZMAT team supplies this equipment when responding to any emergency situation involving potentially hazardous chemicals. Thus, a SCBA is available for the appropriate emergency responders.

92. Page 1-4, line 31. A number of potential changes to the permit are proposed to be treated as minor modifications if they are necessary after the permit has been issued.

Ecology Requirement: Some of these proposed changes can be considered minor modifications but others will require submittal of more specific information prior to determining how these changes to the Part B permit may be done after issuance of the permit.

The following are changes that may be made to the permit, subject to approval by Ecology:

- Addition and/or deletion of dangerous waste codes for waste to be stored as a result of changing regulations
- Changes in the annual quantities of regulated waste to be handled

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- Changes to the 616 NRDSWF unit and/or facility and associated changes to drawings
- Revision of forms included in the permit.

Documentation for the proposed change should be submitted to Ecology; if Ecology does not respond within 60 days from receipt of the proposal, the proposed modification will take effect as a minor modification.

The following changes may be made to the permit as minor modifications in accordance with WAC 173-303-830(4):

- Correction of typographical errors
- Changes to the lists of facility emergency coordinators or equipment identified in the contingency plan
- Inclusion of new and/or updated maps
- Revision of the Radiation Exempt Facility List.

All other permit modifications shall be performed in compliance with the requirements of Section I.D.3., Modifications, of the Hanford Facility Permit. In particular, the potential permit modifications in the permit application, but not listed above (see the Part B Permit Application, page 1-4, lines 41 and 46, and page 1-5, lines 1, 10, and 23) are too ambiguous to be evaluated at this time.

DOE-RL/WHC Response No. 1: The text has been modified to reflect these permit modification requirements. The DOE-RL and Westinghouse Hanford maintain that changes to portions of the contingency plan documents that are not governed by the requirements of WAC 173-303 will not be considered as a modification subject to review or approval by Ecology.

Ecology Response No. 1: Modifications to the permit will be handled per the revised WAC 173-303-830, permit modifications. See number 102.

DOE-RL/WHC Response No. 2: The text has been modified to require that all modifications to the permit be carried out in compliance with the requirements of WAC 173-303-830. Documents submitted to Ecology in support of the permit will be accompanied by a cover letter stating which chapter(s) or section(s) are applicable to the permit. Any part(s) of submitted

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|------------|--|--------------------------------|
| | documents that are not applicable will not be adopted as part of the permit and, therefore, will not be subject to the modification requirements of WAC 173-303-830. | |
| 99. | <p><u>Page 4-4.</u> Control of run-on is discussed, but control of run-off is not.</p> <p><u>Ecology Requirement:</u> Discuss the control of run-off from the facility. In particular, the case of activation of the sprinkler system should be addressed.</p> <p>DOE-RL/WHC Response No. 1: A discussion of the control of run-off has been included in the text.</p> <p><u>Ecology Response No. 1:</u> In the proposed text revision under statement number 5, wipe samples are mentioned with no reference to the procedures. State the procedures which will be used to take these samples and how they will be analyzed.</p> <p>DOE-RL/WHC Response No. 2: The text has been modified to describe the sampling and analysis methods to be used.</p> | |
| 101. | <p><u>Page F6-1.</u> The daily inspection data sheet seems to be conducive to cursory inspections of the facility.</p> <p><u>Ecology Requirement:</u> Modify the daily inspection data sheet so that there are individual check-offs for items D through I for each storage cell and waste handling area, not just the entire facility all in one check mark.</p> <p>DOE-RL/WHC Response No. 1: The daily and weekly inspection datasheets have been modified to include a checkoff line for each area of the building.</p> <p><u>Ecology Response No. 1:</u> Ecology's concerns regarding the proposed inspection checklists were discussed in a telephone conversation with Roger Bowman on 12/11/90. They are as follows:</p> <ul style="list-style-type: none">• Under 2.0, "date" should be changed to "date last tested."• Under 3.0, supplemental information (possibly in the form of a wall chart) should be presented regarding the type, amount, and location of the supplies on the checklist.• The checklist design should be changed so that "yes" or "no" responses may be used instead of "X" and "C" on page 2. | |

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| No. | Comment/Response | Ecology Concurrence |
|------|---|------------------------|
| | <ul style="list-style-type: none">• Under B, the space provided for "Manifest ID#/Location" seems to not be large enough.• Under C, all cells do not have a fire extinguisher; "N/A" should be printed in the appropriate boxes.• The checklists should be reviewed for compliance with the Dangerous Waste Regulation Amendments. | |
| | <p>DOE-RL/WHC Response No. 2: The checklists have been revised to correct identified deficiencies.</p> | |
| 102. | <p><u>Page 7-1, line 12.</u> The permit application states that modifications to the contingency plan may be made but not considered as a modification subject to review or approval by Ecology if the revision is not governed by the requirements of WAC 173-303. After issuance, all modifications to the Part B permit are subject to requirements of Section I.D.3., Modifications, of the Hanford Facility Permit... Delete this paragraph, lines 12 through 17 from the permit application.</p> <p>DOE-RL/WHC Response No. 1: The DOE-RL/WHC maintain that changes to portions of the contingency plan documents that are not governed by the requirements of WAC 173-303 will not be considered as a modification subject to review or approval by Ecology.</p> <p><u>Ecology Response No. 2:</u> Ecology agrees that sections of documents not subject to regulation by Ecology should be excluded from the permit(s). Ecology requests that documents submitted for the permit which contain extraneous information be accompanied by a cover letter stating which chapter(s) or section(s) are applicable to the permit application. Any part(s) of submitted documents not applicable to the permit application will not be adopted as part of the permit and, therefore, will not be subject to the modification requirements of WAC 173-303-830.</p> <p>DOE-RL/WHC Response No. 2: See response to comment number 92.</p> | |

Proposed Text Revisions

91121930357

Response #92

Revise Section 1.4, p. 1-4, to read:

1-4 1.5 PERMIT MODIFICATIONS

All modifications to the permit will be carried out in compliance with the requirements of WAC 173-303-830. Documents submitted to Ecology in support of permits will be accompanied by a cover letter stating which chapter(s) or section(s) are applicable to the permit. Any part(s) of submitted documents that are not applicable will not be adopted as part of the permit and, therefore, will not be subject to the modification requirements of WAC 173-303-830.

Response #99

Revise Section 4.1.1.8 (5), p. 4-4, to read:

5. Wipe samples are taken of the spill area in accordance with an approved procedure using Whatman No. 42 filter paper or an equivalent. The filter paper will be laboratory-prepared and analyzed for constituents known to have been involved in the spill to verify cleanup adequacy.

Response #101

Revise Figures 5-1 and 6-2 of Chapter 6.0 as follows:

Response #102

See response to comment number 92.

Response #101--Figure 6-1. J

Building 616 Daily Solid Waste Operations
Inspection (sheet 1 of 3)

Inspection No. _____ Status: _____ Date: _____ Time: _____

| | Yes | No | If no, specify |
|---|-----|----|----------------|
| 1.0 Office Area | | | |
| Exit Unobstructed | | | |
| Fire extinguisher in place | | | |
| Public address system operating | | | |
| Ventilation indicator lights operating | | | |
| Telephone operating | | | |
| Radio operating | | | |
| 2.0 Hallway | | | |
| Exit sign operating | | | |
| Fire extinguisher in place | | | |
| Exits Unobstructed | | | |
| Protective equipment supply present | | | |
| Pressure differential gage working-reading: | | | |
| 3.0 Receiving Material and Handling Equipment Area | | | |
| Absorbents present | | | |
| Emergency equipment present | | | |
| Exit light operating | | | |
| Exit unobstructed | | | |
| Fire extinguisher in place | | | |
| Overpack drums present | | | |
| Telephone operating | | | |
| Radio operating | | | |
| 4.0 Structure Exterior | | | |
| Curbing in good condition | | | |
| Exits unobstructed | | | |
| Pads/loading area crack free | | | |
| Trenches locked closed/empty | | | |
| No combustibles stored within 50 feet of structure | | | |
| Roads/fire lanes unobstructed | | | |
| Exterior telephone operating | | | |

9-1-1 2-1-91 0059

**Building 616 Daily Solid Waste Operations
Inspection (sheet 2 of 3)**

| | Packaging and Sampling Room ^a | Oxidizer ^a | Caustic ^a | Acid ^a | Combustible ^a | Flammable 1B ^a | Flammable 1A ^a |
|--|--|-----------------------|----------------------|-------------------|--------------------------|---------------------------|---------------------------|
| 5.0 Storage Areas | | | | | | | |
| A. Container Conditions: | | | | | | | |
| Closed | | | | | | | |
| Corrosion | | | | | | | |
| Evidence of leakage | | | | | | | |
| Required labels | | | | | | | |
| Structural defects | | | | | | | |
| B. Structures: | | | | | | | |
| Curbing | | | | | | | |
| Exits unobstructed | | | | | | | |
| Floor | | | | | | | |
| Roof/walls | | | | | | | |
| C. Safety/Emergency Equipment | | | | | | | |
| Exit light operating | | | | | | | |
| Fire extinguisher in place | NA | NA | NA | NA | | | NA |
| D. Container Location^b | | | | | | | |
| Manifest ID#/Location | | | | | | | |
| Manifest ID#/Location | | | | | | | |
| Manifest ID#/Location | | | | | | | |

^aN/A - Not applicable

X - No problems noted

C - See comments for problem description or remedial action required

^bThree container locations are verified against the facility inventory. Record the manifest ID#/location for each container checked above. Record discrepancies identified in the comments section.

Response #101--Figure 6-1.

Response #101--Figure 6-1.

Building 616 Daily Solid Waste Operations Inspection
(sheet 3 of 3)

6. Comments

Inspector

(print name)

(sign name)

7. Remedial Action Taken

8. Solid Waste Operations Supervisor Acknowledgment of Action Completed:

Completion Date: _____

Today's Date: _____

(print name)

(sign name)

91121730861

Response #101--Figure 6-2.

Building 616 Weekly Solid Waste Engineering
Inspection (sheet 1 of 3)

Inspection No. _____ Status: _____ Date: _____ Time: _____

| | Yes | No | If no, specify |
|---|-----|----|----------------|
| 1.0 Office Area | | | |
| Emergency light operable | | | |
| Exit Unobstructed | | | |
| Fire extinguisher charged | | | |
| Public address system operating | | | |
| Ventilation indicator lights operating | | | |
| Telephone operating | | | |
| Radio operating | | | |
| Evacuation alarm tested once monthly; date tested: | | | |
| 2.0 Hallway | | | |
| Exit sign operating | | | |
| Fire extinguisher charged | | | |
| Exits Unobstructed | | | |
| Protective equipment supply present | | | |
| Pressure differential gage working- reading: | | | |
| 3.0 Receiving Material and Handling Equipment Area | | | |
| Absorbents present | | | |
| Emergency equipment present | | | |
| Emergency light operable | | | |
| Exit light operating | | | |
| Exit unobstructed | | | |
| Fire extinguisher charged | | | |
| Overpack drums present | | | |
| Public address system (audible) | | | |
| Telephone operating | | | |
| Radio operating | | | |
| 4.0 Structure Exterior | | | |
| Curbing in good condition | | | |
| Exits unobstructed | | | |
| Pads/loading area crack free | | | |
| Trenches locked closed/empty | | | |
| No combustibles stored within 50 feet of structure | | | |
| Roads/fire lanes unobstructed | | | |
| Exterior telephone operating | | | |

91121710062

9-1-1 2 1-3-9 3 6 3

**Building 616 Weekly Solid Waste Engineering
Inspection (sheet 2 of 3)**

Response #101--Figure 6-2.

| | Packaging and Sampling Room ^a | Oxidizer ^a | Caustic ^a | Acid ^a | Combustible ^a | Flammable 1B ^a | Flammable 1A ^a |
|--|--|-----------------------|----------------------|-------------------|--------------------------|---------------------------|---------------------------|
| 5.0 Storage Areas | | | | | | | |
| A. Container Condition: | | | | | | | |
| Closed | | | | | | | |
| Corrosion | | | | | | | |
| Evidence of leakage | | | | | | | |
| Required labels | | | | | | | |
| Structural defects | | | | | | | |
| B. Structures: | | | | | | | |
| Curbing | | | | | | | |
| Exits unobstructed | | | | | | | |
| Floor | | | | | | | |
| Roof/walls | | | | | | | |
| Signs | | | | | | | |
| C. Safety/Emergency Equipment | | | | | | | |
| Emergency light operable | | NA | | NA | | | NA |
| Exit light operating | | | | | | | |
| Fire extinguisher charged | NA | NA | NA | NA | | | NA |
| Public address system (audible) | | | | | | | |
| Safety shower/eye wash tested/flushed (weekly); date tested: | | NA | NA | NA | | NA | NA |
| D. Container Location^b | | | | | | | |
| Manifest ID#/Location | | | | | | | |
| Manifest ID#/Location | | | | | | | |
| Manifest ID#/Location | | | | | | | |
| Manifest ID#/Location | | | | | | | |
| Manifest ID#/Location | | | | | | | |

^aN/A - Not applicable

X - No problems noted

C - See comments for problem description or remedial action required

^bFive container locations are verified against the facility inventory. Record the manifest ID#/location for each container checked above.

Record discrepancies identified in the comments section.

Response #101--Figure 6-2.

Building 616 Weekly Solid Waste Engineering Inspection
(sheet 3 of 3)

6. Comments

Inspector

_____ (print name)

_____ (sign name)

7. Remedial Action Taken

8. Solid Waste Operations Supervisor Acknowledgment of Action Completed:

Completion Date: _____

Today's Date: _____

_____ (print name)

_____ (sign name)

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CORRESPONDENCE DISTRIBUTION COVERSHEET Page 1 of 2

| | | |
|---|--|---|
| Author RE Lerch, WHC RD Izatt, DOE-RL | Addressee T. L. Nord, Ecology C. E. Findley, EPA | Correspondence No. Incoming 9100753 Ref # 9100235 R2 |
|---|--|---|

Subject: 616 NONRADIOACTIVE DANGEROUS WASTE STORAGE FACILITY PART B PERMIT APPLICATION (TSD: S-6-1)

INTERNAL DISTRIBUTION

| Approval | Date | Name | Location | w/aet |
|----------|------|------|----------|-------|
|----------|------|------|----------|-------|

SOLID/LIQUID WASTE REMEDIATION

| | |
|----------------|-------|
| W. H. Hamilton | N3-10 |
| S. H. Norton | T3-28 |
| R. D. Pierce | R2-80 |
| L. W. Roberts | R2-97 |
| R. J. Roberts | R2-97 |
| M. R. Romsos | R2-82 |

ENVIRONMENTAL DIVISION

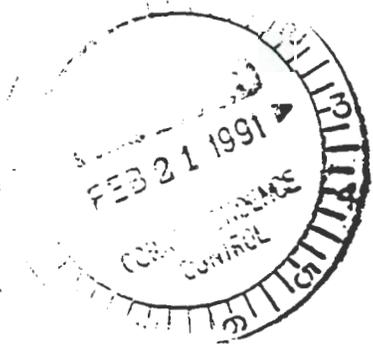
| | |
|------------------------|-------|
| R. C. Bowman | H4-57 |
| L. C. Brown | H4-51 |
| C. J. Geier | H4-57 |
| R. J. Landon | B2-19 |
| R. E. Lerch (Assignee) | B2-35 |
| S. M. Price | H4-57 |

SAFETY, QUALITY ASSURANCE,
AND SECURITY

| | |
|------------------|-------|
| J. R. Bell | R3-60 |
| G. D. Carpenter | B2-16 |
| D. G. Farwick | H4-16 |
| J. W. Hagan | G6-55 |
| S. G. Hodge | R3-54 |
| P. R. Praetorius | S1-56 |

GENERAL COUNSEL

| | |
|------------------|-------|
| B. D. Williamson | B3-06 |
|------------------|-------|



CORRESPONDENCE DISTRIBUTION COVERSHEET Page 2 of 2

| | | |
|-----------------------------------|---|---------------------|
| Author | Addressee | Correspondence No. |
| RE Lerch, WHC RD Izatt, DOE-RL | T. L. Nord, Ecology C. E. Findley, EPA | Incoming 9100753 |
| | | Ref # 9100235 R2 |

Subject: 616 NONRADIOACTIVE DANGEROUS WASTE STORAGE FACILITY PART B PERMIT APPLICATION (TSD: S-6-1)

INTERNAL DISTRIBUTION

| Approval | Date | Name | Location | w/att |
|----------|------|------|----------|-------|
|----------|------|------|----------|-------|

ENVIRONMENTAL AND WASTE PROGRAM INTEGRATION

| | |
|--------------|-------|
| L. L. Powers | B2-35 |
| J. L. Waite | B2-35 |

| | |
|-----------------|-------|
| cc: R. J. Bliss | B3-04 |
| EDMC/AR | H4-51 |
| RCB File/LB | H4-57 |
| REL LB | B2-35 |

Enclosures same as
in letter #9100235 R2

