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## Department of Energy

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91-EAB-330

OCT 31 1991



Mr. Charles E. Findley, Director  
Hazardous Waste Division  
U.S. Environmental Protection Agency  
1200 Sixth Avenue  
Seattle, Washington 98101

Mr. Timothy L. Nord  
Hanford Project Manager  
State of Washington  
Department of Ecology  
Mail Stop PV-11  
Olympia, Washington 98504-8711

Dear Messrs. Findley and Nord:

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

This letter transmits the 616 Nonradioactive Dangerous Waste Storage Facility (NRDWSF) Dangerous Waste Permit Application in response to a letter received from the State of Washington Department of Ecology (Ecology) on August 9, 1991. That letter requested that the permit application be revised and resubmitted by October 31, 1991, to address Ecology's Notice of Deficiency (NOD) comments on Revision 1, dated August 30, 1990, December 18, 1990, and July 8, 1991. An NOD response table that summarizes the disposition of these comments is enclosed. These dispositions reflect agreements that have been reached since the submittal of Revision 0 in July 1989.

Per your request, copies of the 616 NRDWSF Dangerous Waste Permit Application have been distributed as follows: (1) five copies to Mr. T. M. Michelena of Ecology (Lacey, Washington, office); (2) one copy to Mr. D. C. Nylander of Ecology (Kennewick, Washington, office); and (3) two copies to Mr. D. L. Duncan of the U.S. Environmental Protection Agency (Seattle, Washington, office).



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Messrs. Findley and Nord  
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If you have any questions regarding this permit application, please contact Mr. C. E. Clark of the DOE Field Office, Richland, on (509) 376-9333, or Ms. S. M. Price of Westinghouse Hanford Company on (509) 376-1653.

Sincerely,

*E. A. Bracken*

E. A. Bracken, Director  
Environmental Restoration Division  
DOE Field Office, Richland

ERD:CEC

*R. E. Lerch*

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

Enclosures:

1. 616 NRDSF Dangerous Waste Permit Application
2. NOD Response Table

cc: P. J. Day, EPA, w/encl.  
D. L. Duncan, EPA, w/encl.  
R. E. Lerch, WHC, w/o encl.  
T. M. Michelena, Ecology, w/encl.  
D. C. Nylander, Ecology, w/encl.

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THE 616 NONRADIOACTIVE DANGEROUS WASTE STORAGE FACILITY NOD RESPONSE TABLE

No.	Comment/Response	Ecology Concurrence
1.	<p><u>Page 1-1, Section 1.1.</u> Citation reads "(WAC) 173-303-630 (Ecology 1989)."</p> <p><u>Ecology Requirement:</u> Citation must give most recent version of 173-303. This is currently January 1989. Please change the reference appropriately.</p> <p><u>DOE-RL/WHC Response:</u> The citation simply provides a reference to Chapter 15.0 where the full reference is given. The text will remain unmodified.</p>	03/23/90
	<p><u>Response Location in Revision 2:</u> Not applicable.</p>	03/23/90
2.	<p><u>Page 2-6, Section 2.1.2.2, 3rd Paragraph.</u> This paragraph discusses the containment and cleanup procedures for spills into the containment. A reference to Chapter 7.0 (Contingency Plan) should be given.</p> <p><u>Ecology Requirement:</u> Please modify this section accordingly.</p> <p><u>DOE-RL/WHC Response:</u> The text will be modified to include a reference to Chapter 7.0, Section 7.4.9.</p>	
	<p><u>DOE-RL/WHC Modified Response:</u> The actual facility emergency plan will be included as Appendix 7A. The text will be modified to include a reference to Appendix 7A.</p>	
	<p><u>Response Location in Revision 2:</u> Page 2-4, lines 8-10.</p>	
3.	<p><u>Page 2-7, Section 2.1.2.2, 2nd Paragraph.</u> The text discusses the location and design of the heating and ventilation system with no referenced design drawings.</p> <p><u>Ecology Requirement:</u> Please include the design drawings for the entire facility. This should include the ventilation and exhaust systems. This comment also applies to all other facility drawings.</p> <p><u>DOE-RL/WHC Response:</u> Drawings of the facility and the heating, ventilation, and air conditioning system have been added.</p>	03/23/90
	<p><u>Response Location in Revision 2:</u> Page 2-2, lines 42-43; page 2-4, lines 34-35; page F2-4, Figure 2-4; Appendices 4A and 4B.</p>	

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4.	<p><u>Page 2-7, Section 2.1.2.2.1.</u> The text states there is a 2 hour fire-wall and a 1.5 hour fire-rated door.</p> <p><u>Ecology Requirement:</u> The effectiveness of the fire barriers is only as good as the lowest fire rated component, in this case the doors. Please justify the difference in fire-rating between the doors and the walls. This justification should be sufficient for all similar fire-rating discrepancies stated throughout the text.</p> <p><u>DOE-RL/WHC Response:</u> National Fire Protection Agency (NFPA) 101 "Life Safety Code" specifically requires that a 1.5 hour door be placed in a 2 hour rated wall. In addition, see the Uniform Building Code, NFPA 80 (Fire Doors and Windows), Factory Mutual Approval Guide, Underwriters Laboratories, and the Building Materials Directory. The text will remain unmodified.</p> <p><u>Response Location in Revision 2:</u> Not applicable.</p>	03/23/90
5.	<p><u>Page 2-8, Section 2.1.2.3, 3rd Paragraph.</u> The text states that administrative controls will prevent the release of dangerous wastes into the sink, with the associated discharge to the tile field, without detailing the administrative controls employed to accomplish this task.</p> <p><u>Ecology Requirement:</u> Detail the administrative controls utilized to prevent the discharge of dangerous wastes into the sink.</p> <p><u>DOE-RL/WHC Response:</u> A locking valve will be placed on the drain line from the sink and locked closed. Only liquids that are known to be non-regulated will be disposed of to the tile field. Operating procedures will be developed to provide administrative controls over this valve. This procedure will be included in the permit application (see response to comment number 69).</p> <p><u>DOE-RL/WHC Modified Response:</u> A blind flange will be installed on the sink drain to prevent the discharge of any dangerous waste to the tile field.</p> <p><u>Response Location in Revision 2:</u> Page 2-6, line 25; page 11-5, lines 1-2.</p>	03/23/90
6.	<p><u>Page 2-9, Section 2.1.2.4.</u> The text outlines the equipment and material stored in the packaging and equipment handling area without a complete inventory of materials, or a reference to Chapter 6.0 (Procedures to Prevent Hazards) or Chapter 7.0 (Contingency Plan) for further discussion.</p>	03/23/90

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6.	<p>(cont)</p> <p><u>Ecology Requirement:</u> Either provide a detailed inventory for this equipment or reference the appropriate section in this application for further discussion.</p> <p><u>DOE-RL/WHC Response:</u> Section 7.5.3 will list the minimum equipment to be maintained. A reference will be made in Section 2.1.2.4 and Section 6.3.1.3 to Section 7.5.3.</p> <p><u>DOE-RL/WHC Modified Response:</u> The list of equipment is included in the actual facility emergency plan included as Appendix 7A. The text has been modified to include a reference to Appendix 7A.</p> <p><u>Response Location in Revision 2:</u> Page 2-7, lines 18-19.</p>	
7.	<p><u>Page 2-9, Section 2.1.2.6.</u> The text describes the loading and unloading pad with the trench for liquid collection. The text further discusses the removal plug in the trench to allow rainwater to be discharged to a french drain. This is an extremely vulnerable aspect of the design of the 616 Building. It is difficult to ensure that the plug in this trench is always secured and functioning. Should a release occur into the french drain, clean closure would only become possible with a very expensive removal action.</p> <p><u>Ecology Requirement:</u> Outline the administrative controls which will ensure this requirement will not allow a discharge of hazardous constituents into the environment or design and implement a better valve system (as opposed to the plug) for the trench.</p> <p><u>DOE-RL/WHC Response:</u> The plug fitting in the trenches of the exterior loading pads will be modified so they can be locked closed. Only facility management personnel (or their alternates) will have access to a key. Material will not be released until it is known to not be regulated either by process knowledge or analytical testing. Note: There are two trenches connected to the french drain. Response is applicable to both trenches. Operating procedures will be developed to provide administrative controls over this valve. This procedure will be included in the permit application (see response to comment number 69).</p> <p><u>Response Location in Revision 2:</u> Page 2-7, lines 48-50; page 2-12, lines 40-52, page 2-13, lines 1-22.</p>	03/23/90

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No.	Comment/Response	Ecology Concurrence
8.	<p>Page 2-9, Section 2.1.2.6. The plan discusses the 'french drain' associated with this facility but no drawings are provided.</p> <p><u>Ecology Requirement:</u> Please provide detailed drawings of the french drain system for this building. This comment also pertains to the tile field which is depicted only in a general manner.</p> <p><u>DOE-RL/WHC Response:</u> A drawing showing the french drain and tile field has been added.</p> <p><u>Response Location in Revision 2:</u> Page F2-6, Figure 2-6.</p>	03/23/90
9.	<p>Page 2-10, Section 2.1.2.6. The text states that the personnel will monitor the pH prior to discharging the contents of the trench without giving any justification for monitoring only pH.</p> <p><u>Ecology Requirement:</u> A pH only monitoring program for liquids in this trench prior to discharge is unacceptable. Due to the diverse nature of material handled in this facility and the consequences of a discharge to the french drain, a more detailed monitoring program is required. Please modify this section accordingly.</p> <p><u>DOE-RL/WHC Response #1:</u> As stated in Section 2.1.2.6, the trench is kept covered when the pad is not in use. Liquid is released from the trench based on pH alone only after the following:</p> <ol style="list-style-type: none"><li data-bbox="159 1011 1406 1039">1) It is known that no waste material has been introduced into the trenches.</li><li data-bbox="159 1073 906 1101">2) The liquid is from a rainfall or snowmelt.</li></ol> <p>The only way rain/snow water can become regulated is if the trench or loading pad were contaminated. Based on prior knowledge of the pad, trench, and the source of liquid, there is no requirement to sample the liquid in the trench. The pH of the liquid is taken to ensure that Westinghouse Hanford design standards are not exceeded (pH &lt; 4, or &gt;10). Use of a more comprehensive testing program for rain water collected in the loading pad trenches is currently being evaluated.</p> <p><u>Ecology Response:</u> In order to confirm that the trench liquids do not contain other contaminants, use of additional real-time screening methods is required prior to release of any liquids to the french drain. Revise this and all other affected sections, at a minimum, the analytical parameters and procedures for testing trench liquids must be covered.</p>	12/18/90

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9.	<p>(cont) DOE-RL/WHC Response #2: A description of the process involved in verifying that the rainwater is clean prior to discharge is included in the permit application. This process includes documented inspections of the loading pad and documented analytical verification of spill clean up efforts. Prior to discharge of the rainwater all documentation is reviewed to verify that the pad is clean and a certification statement is entered into the facility logbook.</p> <p><u>Response Location in Revision 2:</u> Page 2-8, lines 25-27; page 2-12, lines 40-52; page 2-13, lines 1-22.</p>	
10.	<p><u>Page 2-10, Section 2.2.</u> The topographic map outlines the legal boundaries of the facility yet no legal description is given.</p> <p><u>Ecology Requirement:</u> Please provide a legal description of this facility. <u>DOE-RL/WHC Response:</u> A legal description of the 616 NRDWSF site will be provided.</p> <p><u>Response Location in Revision 2:</u> Page 2-9, line 5; Appendix 2A.</p>	12/18/90
11.	<p><u>Page 2-10, Section 2.3.1.</u> Ecology is currently evaluating the necessity of requiring seismic analysis for all facilities on the Hanford Site. Section 2.3.1 will be re-evaluated upon completion of this determination.</p> <p><u>DOE-RL/WHC Response:</u> The text has been modified to indicate that the 616 NRDWSF was designed in accordance with the Hanford Plant Standards, Standard Design Criteria - 4.1. This plant standard provides seismic load criteria specific to the Hanford Site.</p> <p><u>Response Location in Revision 2:</u> Page 2-9, lines 16-20.</p>	03/23/90

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12.	<p><u>Page 2-17, Section 2.5.1.</u> The text outlines the facility's abilities for protection of groundwater yet no discussion is made of the french drain or tile field. Without properly addressing these issues, this section is inadequate.</p> <p><u>Ecology Requirement:</u> Please modify this section accordingly.</p> <p><u>DOE-RL/WHC Response:</u> The tile field is connected to the drains from the sinks on the 'clean' side of the building. The drain from the Packaging-Sampling Room will be equipped with a lockable valve. Only liquids that are known to be non-regulated will be disposed of to the tile field. The french drain is used to drain both loading pad trenches. The loading pad trenches are equipped with plugs that are kept locked and the only person(s) with a key is facility management. Liquid will be discharged to the french drain only after it is known that it is not regulated (see response to comment number 9). Section 2.5.1 will be amended.</p> <p><u>DOE-RL/WHC Modified Response:</u> A blind flange will be installed on the sink drain to prevent the discharge of any dangerous waste to the tile field.</p> <p><u>Response Location in Revision 2:</u> Page 2-6, line 25; page 11-5, lines 1-2.</p>	03/23/90
13.	<p><u>Page 2-18, Section 2.5.7.</u> The text states that the soil was compacted prior to construction of the 616 facility yet no details of this are given.</p> <p><u>Ecology Requirement:</u> Please detail how the soils were compacted prior to construction.</p> <p><u>DOE-RL/WHC Response:</u> The soil compaction procedure has been provided.</p> <p><u>Response Location in Revision 2:</u> Page 2-14, lines 27-34.</p>	03/23/90
14.	<p><u>Page 3-1, Section 3.1.</u> The text states that the generating units are responsible for designating the wastes they produce. This is true, however, this does not alleviate the receiving facility (i.e., 616 NRDWSF) from verifying wastes accepted.</p> <p><u>Ecology Requirement:</u> Please modify this section to address the 616 facility's responsibility for waste verification. This must include modifying Section 3.0 to include a waste sampling program for verifying loads received at the facility.</p>	

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14. (cont)

DOE-RL/WHC Response No. 1: Washington Administrative Code 173-303-300(3), *General Waste Analysis*, requires that "...The owner or operator of an offsite facility shall confirm, by analysis..." Because the 616 NRDWSF accepts only DOE-RL waste generated onsite (from facilities under the same ID number), the 616 NRDWSF is not an offsite facility. Therefore, verification of the waste accepted at the 616 NRDWSF is not required.

Ecology Response No. 1: The intent of this regulation is to ensure that there is verification of the generator designation. Because the facilities at the Hanford Site are operated as separate facilities, Ecology is requiring institution of a verification sampling program for all wastes received at the NRDWSF. As discussed at the Unit Manager's meeting of 1/23/90, this sampling may be done at the 616 NRDWSF or at the generator site provided that there is no further possibility for the generator to alter the waste constituents. Modification of the procedure discussed in comment number 28 may be sufficient to fulfill this requirement.

DOE-RL/WHC Response No. 2: A description of the process used to perform the initial designation of waste and subsequent control of the waste from the time of designation through offsite shipment is included in the permit application. This process includes a description of the method for initial designation of the waste, control of the waste from designation through shipment offsite, and the oversight performed of this process.

Ecology Response No. 2: Page 3-1, line 23. The revised text on page 3-1, lines 23-38, and references therein, is intended to demonstrate the adequacy of the waste designation procedure in use at the Hanford Facility. Although the procedure discussed indicates that there are numerous controls to prevent tampering with containerized wastes, the actual steps for the waste designation appear to have insufficient quality assurance or quality control. It has not been demonstrated that the Hanford Facility waste designation procedures are adequate for the purpose and intent of WAC 173-303-110.

Furthermore, dependence on offsite treatment, storage, and/or disposal (TSD) facilities for testing of wastes is not adequate because the Hanford Facility has no control over the receiving facility's quality assurance and quality control procedures.

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14. (cont)  
Ecology Requirement: Institution of a waste designation sampling and analysis verification program is required. This program must comply with the requirements of Section II.E., *Site Wide Waste Analysis Plan*, of the Hanford Facility Part B Permit. This requirement may be fulfilled by restricting acceptance of wastes at the 616 NRDFS to those designated in accordance with the waste analysis plan of the Hanford Facility Permit.  
DOE-RL/WHC Response No. 3: This issue is being resolved as part of the Hanford Facility Part B Permit.

Ecology Response No. 3: Waste sampling and analysis for verification of designation is being resolved as part of the Hanford Facility Part B Permit.

DOE-RL/WHC Response No. 4: Acknowledged. A paragraph has been added to the text referring to the Hanford Facility Permit Application for guidance on development of the Hanford Waste Analysis Plan.

Response Location in Revision 2: Page 3-3, lines 31-39.

15. Page 3-2, Section 3-1. The text states that 616 NRDFS receives empty waste drums without discussing the sources or handling of these drums.

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Ecology Requirement: Please modify this section or include a discussion elsewhere which better describes the empty drums received and the procedures for processing them.

DOE-RL/WHC Response #1: The text will be modified to clarify the handling of empty drums at the 616 NRDFS.

Ecology Response: Note that 'empty drum' is defined in WAC 173-303-160; the modified text must take into account the specific regulatory definition for an 'empty drum'.

DOE-RL/WHC Response #2: The text will be modified to take into account the specific regulatory definition.

Response Location in Revision 2: Page 3-1, line 31.

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16.	<p><u>Page 3-2, Section 3.1.</u> The text states that containerized wastes which cannot be assigned a waste code are accepted at this facility.</p> <p><u>Ecology Requirement:</u> Please detail why these wastes are accepted and how they are handled. This facility should only receive hazardous wastes destined for off-site shipment. <u>DOE-RL/WHC Response:</u> There is no requirement in the Washington Administrative Code prohibiting a TSD from storing non-regulated waste. The non-regulated wastes stored at the TSD are normally destined for offsite shipment and disposal. The text was modified to remove any discussion about non-regulated waste.</p> <p><u>Response Location in Revision 2:</u> Page 3-1, lines 29-31.</p>	03/23/90
17.	<p><u>Page 3-5, Section 3.2, 4th Paragraph.</u> The text states "...waste is either tested for radioactivity or exempted from this testing based on waste location and history."</p> <p><u>Ecology Requirement:</u> Please provide a list, including justification, of onsite points of generation which would produce waste exempt from radiation screening. <u>DOE-RL/WHC Response:</u> An explanation of how a generation site is exempted from radiation screening, as well as a list of exempt sites, will be included in the text. The text will also state that: 1) this list is subject to change and will be updated periodically, and 2) updates of this list will be incorporated into the permit as a minor modification.</p> <p><u>Response Location in Revision 2:</u> Page 3-5, lines 47-52; page 3-6, lines 1-10.</p>	03/23/90
18.	<p><u>Page 3-5, Section 3.2.</u> The first bullet under 'Waste Disposal Analysis' states that the Treatment, Storage, and Disposal (TSD) staff will conduct a waste designation. Is this a verification of the designation provided by the generator or is this the first designation of the waste?</p> <p><u>Ecology Requirement:</u> Please clarify this statement. <u>DOE-RL/WHC Response:</u> Because the TSD is an onsite facility, the personnel designated as its technical staff also assist generators obtain proper waste designation. This is the first designation of the waste. The text will be modified to clarify this statement.</p> <p><u>Response Location in Revision 2:</u> Page 3-4, lines 29-33.</p>	03/23/90

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19.	<p><u>Page 3-6, Section 3-2, 1st Paragraph.</u> The text discusses the responsibilities of the TSD technical staff. Is this staff from the 616 NRDWSF or from another group at the Hanford Site?</p> <p><u>Ecology Requirement:</u> Please clarify 'staff.'</p> <p><u>DOE-RL/WHC Response:</u> The TSD technical staff (assigned to the 616 NRDWSF) provides waste designation guidance to various site generators (see response to comment number 18). The text will be modified to clarify 'staff.'</p> <p><u>DOE-RL/WHC Modified Response:</u> The TSD technical staff has been more specifically identified as the Solid Waste Engineering staff. The text has been modified to indicate that the Solid Waste Engineering Staff performs an oversight function, independent from the generating units.</p> <p><u>Response Location in Revision 2:</u> Page 3-4, lines 13-14.</p>	12/18/90
20.	<p><u>Page 3-6, Section 3-2.</u> The 'Waste Spill or Leak Identification' paragraph should reference Chapter 7.0 (Contingency Plan).</p> <p><u>Ecology Requirement:</u> Please modify the text accordingly.</p> <p><u>DOE-RL/WHC Response:</u> Chapter 7.0, Section 7.4.9 will be referenced in paragraph 3 'Waste Spill or Leak Identification.'</p> <p><u>DOE-RL/WHC Modified Response:</u> The actual facility emergency plan will be included as Appendix 7A. The text will be modified to include a reference to Appendix 7A.</p> <p><u>Response Location in Revision 2:</u> Page 3-4, lines 26-27.</p>	03/23/90
21.	<p><u>Page 3-6, Section 3.2.1.</u> This discussion states that "Discarded Chemical Formulations" constitute the bulk of the waste generated onsite. As "Discarded Chemicals" have a very specific meaning in WAC 173-303, this statement does not seem reasonable.</p> <p><u>Ecology Requirement:</u> Please define 'Discarded Chemical Formulations' and provide justification for this statement.</p> <p><u>DOE-RL/WHC Response:</u> Section 3.2.1 will be amended to clarify the types of waste generated on the Hanford Site.</p> <p><u>Response Location in Revision 2:</u> Page 3-6, lines 49-51.</p>	03/23/90

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22.	<p><u>Page 3-7, Table 3-3.</u> Apparently, Biological Testing was inadvertently omitted from this table.</p> <p><u>Ecology Requirement:</u> Please modify the table to include biological testing.</p> <p><u>DOE-RL/WHC Response:</u> Biological testing will be added to Table 3-3.</p> <p><u>Response Location in Revision 2:</u> Page T3-3.2, Table 3-3.</p>	03/23/90
23.	<p><u>Page 3-7, Table 3-3.</u> The Toxic Concentration Leachate procedure testing required for certain Land Disposal Restricted wastes is not on this table.</p> <p><u>Ecology Requirement:</u> Please justify this omission or include it as an appropriate designation.</p> <p><u>DOE-RL/WHC Response #1:</u> The NRDWSF is solely a storage facility. Westinghouse contracts disposal of regulated waste with an approved off-site disposal facility. A letter is sent with each shipment indicating those materials banned from land disposal and the treatment technologies available. The contracted treatment, storage, and/or disposal facility is responsible for determining which of the listed treatment methods it will use. A note is included explaining that if an immobilization technology is used, TCLP testing of the immobilized material must be performed. The contracted disposal facility performs the TCLP testing. The certification statement sent to the off-site TSD identifying the land disposal restricted wastes will be included in the text.</p> <p><u>Ecology Response:</u> Elaborate on the requirements and situations for TCLP testing, this must take into consideration the disposal of 'non-leachable' wastes that will not receive further treatment at the disposal facilities. In addition, note that Ecology will be requiring TCLP in place of Extraction Procedure Toxicity.</p> <p><u>DOE-RL/WHC Response #2:</u> The text has been so modified</p> <p><u>Response Location in Revision 2:</u> Page T3-3.2, Table 3-3.</p>	03/23/90

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24.	<p>Page 3-11, Section 3.2.3. This section describes sampling methods for waste designation. Is this done at the 616 NRDWSF or at the point of generation?</p> <p><u>Ecology Requirement:</u> Please clarify this point. <u>DOE-RL/WHC Response:</u> The sampling is done at the point of generation; this section has been amended.</p> <p><u>Response Location in Revision 2:</u> Page 3-7, lines 22-24.</p>	03/23/90
25.	<p>Page 3-11, Section 3.2.3, 2nd Paragraph. This paragraph discusses sampling material which has phase separated by using a COLIWASA for obtaining a composite sample.</p> <p><u>Ecology Requirement:</u> Waste which has phase separated must be sampled and designated for each phase in the container. Please modify this sampling procedure to clarify this issue. <u>DOE-RL/WHC Response:</u> Section 3.2.3 will be amended to "sample analysis are performed on each phase of the waste."</p> <p><u>Response Location in Revision 2:</u> Page 3-7 lines 33-35.</p>	03/23/90
26.	<p>Page 3-12, Section 3.2.3. The first paragraph states that "...will be handled so that analytical interference...will be precluded." The second paragraph gives one example and no other justification or procedure is given.</p> <p><u>Ecology Requirement:</u> Further explanation of the steps taken to ensure cross contamination of samples and sampling equipment does not occur is required. <u>DOE-RL/WHC Response:</u> The text will be modified to clarify the steps taken to ensure cross contamination does not occur.</p> <p><u>Response Location in Revision 2:</u> Page 3-7, lines 45-47; page 3-8, lines 1-3.</p>	03/23/90

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27.	<p><u>Page 3-12, Section 3.2.4.</u> This paragraph discusses the designation procedure to be followed if a continuous waste stream is generated onsite. This procedure would be to give a one-time designation with an annual verification of this designation. Although the annual verification may be acceptable (depending on the waste stream) more than the initial stream characterization would be required to ensure that the stream is consistent.</p> <p><u>Ecology Requirement:</u> Please modify this discussion to recognize a more intensive waste stream analysis required for an initial designation of a continuously generated waste stream. <u>DOE-RL/WHC Response:</u> The text will be modified to further discuss initial analysis requirements.</p> <p><u>Response Location in Revision 2:</u> Page 3-8, lines 15-24.</p>	03/23/90
28.	<p><u>Page 3-12, Section 3.2.5, 3rd Paragraph.</u> This paragraph discusses designation based upon process knowledge. There is far too much reliance on process knowledge for waste stream characterization and designation on the Hanford Site. The Hanford Site staff should consider undertaking a site wide re-evaluation of the use of process knowledge to designate waste streams.</p> <p><u>DOE-RL/WHC Response #1:</u> Waste is designated using process knowledge [WAC-173-303-300(2)] only when the generator can certify what the waste is and has data available on that material. In all other cases the waste is analyzed as required in WAC-173-303. Westinghouse Hanford processes over 2,000 waste sample analyses per year. Process knowledge is used only when applicable and appropriate. The text will remain unmodified.</p> <p><u>Ecology Response:</u> Verification sampling of some part of the process knowledge waste stream is required. This requirement may be satisfied within the general verification sampling procedures developed to fulfill the requirements of comment number 14.</p> <p><u>DOE-RL/WHC Response #2:</u> A description of the process used to perform the initial designation of waste and subsequent control of the waste from the time of designation through offsite shipment will be included in the permit application. This information will be provided as part of the process description explained in the DOE-RL/WHC Response #2 to comment number 14.</p> <p><u>Response Location in Revision 2:</u> Page 3-3, lines 41-52; page 3-4, lines 1-51; page 3-5, lines 1-52; page 3-6, lines 1-38.</p>	03/23/90

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29.	<p><u>Page 3-15, Section 3.2.5, 3rd Paragraph.</u> This paragraph states "[w]aste shipments are not analytically verified..." This is not acceptable.</p> <p><u>Ecology Requirement:</u> There must be some type of waste shipment verification (to include analytical verification) of incoming waste streams. This NOD will not mandate a specific frequency of verification but will require a revision of this section to include such sampling for inclusion in the next application submittal for review and approval. DOE-RL/WHC Response #1: The statement will be removed (see response to comment number 14).</p> <p><u>Ecology Response:</u> Ecology is requiring institution of a verification sampling program, see comment number 14. DOE-RL/WHC Response #2: A description of the process used to perform the initial designation of waste and subsequent control of the waste from the time of designation through offsite shipment will be included in the permit application. This information will be provided as part of the process description explained in the DOE-RL/WHC Response #2 to comment number 14.</p> <p><u>Response Location in Revision 2:</u> Page 3-3, lines 41-52; page 3-4, lines 1-51; page 3-5, lines 1-52; page 3-6, lines 1-38.</p>	03/23/90
30.	<p><u>Page 3-18, Figure 3-6.</u> This figure is barely legible.</p> <p><u>Ecology Requirement:</u> Please enlarge this figure so it is more readable. DOE-RL/WHC Response: The figure will be enlarged.</p> <p><u>Response Location in Revision 2:</u> Page F3-4, Figure 3-4.</p>	03/23/90
31.	<p><u>Page 4-4, Section 4.1.1.4.</u> This paragraph outlines the use of 'Aquapon' as a concrete sealant and refers the reader to Appendix 4C for further details. Appendix 4C only has the Material Safety Data Sheet for this product and no performance evaluations.</p> <p><u>Ecology Requirement:</u> Please provide further documentation on this product. Of particular importance will be information which details the performance of this material when exposed to the various waste types located in the 616 NRDFS.</p> <p>DOE-RL/WHC Response: Performance evaluations will be provided in Appendix 4D.</p> <p><u>Response Location in Revision 2:</u> Appendix 4D.</p>	12/18/90

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32.	<u>Page 4-4, Section 4.1.1.4.</u> The text describes cement crack repair yet there are no details of this procedure.  <u>Ecology Requirement:</u> Please provide a procedure for cement crack repair. <u>DOE-RL/WHC Response:</u> A description of the procedure for crack repair has been provided.  <u>Response Location in Revision 2:</u> Page 4-4, lines 1-15.	12/18/90
33.	<u>Page 4-4, Table 4-3.</u> Table 4-3 states the Storage Cell Volume in gallons. This volume is based upon double stacking containers in rows as depicted in Figure 6-3. There should be no double stacking of drums which are in one row as is shown for Row 3 in the acid, combustible, oxidizer, and caustic cells.  <u>Ecology Requirement:</u> Please modify Section 4.1.1.6, Table 4-3, Figure 6-3, and any other section affected by this comment. <u>DOE-RL/WHC Response #1:</u> Containers will continue to be double stacked in the single drum rows. The text will be modified to limit the second tier to containers less than or equal to 30 gallons in size and weighing less than or equal to 100 pounds.  <u>Ecology Response:</u> Containers less than 30 gallons in volume and 50 pounds in weight may be double-stacked in the single drum rows; containers that exceed 30 gallons in volume or 50 pounds in weight may be placed on the floor or palletized and double stacked on double drum rows. Also, detailed procedures for double-stacking containers in the single drum rows must be provided within the permit application. See comment numbers 39 and 40. <u>DOE-RL/WHC Response #2:</u> A description of the waste stacking process will be included in the permit application. This process will follow all applicable health and safety guidelines for lifting and stacking.  <u>Response Location in Revision 2:</u> Page 4-2, lines 23-43.	03/23/90

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34.	<p>Page 4-5, Section 4.1.1.7. The text describes the procedures for collecting run-on to the facility but no reference is made to Chapter 7.0 (Contingency Plan) where these procedures are spelled out in more detail.</p> <p><u>Ecology Requirement:</u> Please include a reference to the appropriate section. <u>DOE-RL/WHC Response:</u> A reference will be added to Chapter 7.0, Section 7.4.9.</p> <p><u>DOE-RL/WHC Modified Response:</u> The actual facility emergency plan will be included as Appendix 7A. The text will be modified to include a reference to Appendix 7A.</p> <p><u>Response Location in Revision 2:</u> Page 4-4, lines 47-48.</p>	03/23/90
35.	<p>Page 5-1, Section 5.0. This statement is true until the french drain or tile field systems receive dangerous wastes (see comment numbers 7 and 8).</p> <p><u>DOE-RL/WHC Response #1:</u> The tile field has been removed from potential contamination by addition of the locked drain valve (see the response to comment number 5). The locked valve in the loading pad trenches is a significant barrier to contaminating the french drain (see the response to comment number 7). The text will remain unmodified.</p> <p><u>Ecology Response:</u> Design drawings and performance specifications for the locking valve and its operating procedures (including contaminant screening) must be presented within the permit application. See comment number 9.</p> <p><u>DOE-RL/WHC Response #2:</u> A blind flange will be installed on the sink drain to prevent the discharge of any dangerous waste to the tile field. A drawing showing the locking mechanism installed over the threaded plugs in the loading area trenches is included.</p> <p><u>Response Location in Revision 2:</u> Page 2-6, line 25; page 2-12, lines 40-52; page 2-13, lines 1-22; page F2-6, Figure 2-6.</p>	03/23/90

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36.	<p><u>Page 6-1, Section 6.1.1.3.</u> This paragraph seems to say that the facility is occupied from 7:30 to 4:00 daily. This is misleading. Conversations with facility staff have shown that the facility is only occupied when waste is being received, moved, or inspected.</p> <p><u>Ecology Requirement:</u> Please clarify this section.  <u>DOE-RL/WHC Response:</u> The Hanford Site operates 24 hours a day, 365 days per year. The building can and may be occupied at any time. Generally, the building is occupied on Day Shift (beginning at 7:30 a.m. and ending at 4:00 p.m.). The facility is locked when vacant. The text has been modified to clarify this.</p> <p><u>Response Location in Revision 2:</u> Page 6-1, lines 34-38.</p>	03/23/90
37.	<p><u>Page 6-4, Section 6.3.1.1.</u> The text describes the onsite communications system yet no references to locations are given.</p> <p><u>Ecology Requirement:</u> Please include in Figure 6-1 the locations of internal and external communications devices (see comment number 2).  <u>DOE-RL/WHC Response:</u> All communication devices have been shown in the Building Emergency Plan - 616 Building.</p> <p><u>Response Location in Revision 2:</u> Appendix 7A.</p>	03/23/90
38.	<p><u>Page 6-5, Section 6.3.1.3.</u> 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.  <u>DOE-RL/WHC Response No. 1:</u> 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).  <u>DOE-RL/WHC Response No. 2:</u> The list of equipment is included in the actual 616 Building Emergency Plan included as Appendix 7A. The text has been modified to include a reference to Appendix 7A.</p>	07/8/91

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38. (cont)

Ecology Response No. 2: 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).

Ecology Requirement: 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.

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 at the 616 NRDWSF. 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 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.

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."

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38.	<p>(cont)</p> <ul style="list-style-type: none"> <li>• 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.</li> </ul> <p>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.</p> <p>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 may occasionally be in the NRDWSF for use in daily operations or in chemical response at other locations. The specific changes are as follows.</p> <p>Dust Masks have been deleted from the list since as indicated they are actually used only for nuisance type dusts and are not actually used for emergency response.</p> <p>Chemical Resistant Gloves have been revised to more accurately reflect the actual use of each glove type. This section of Table 1 has been replaced with the following information to identify, describe, and indicate capabilities of the gloves.</p> <ul style="list-style-type: none"> <li>• <u>Solvent Resistant Gloves*</u> <ul style="list-style-type: none"> <li>10 pair minimum-either Viton(TM), Butyl, Nitrile, Neoprene, or equivalent.</li> <li>Provide protection for hands when exposed to solvents, alcohols, and/or water based solutions.</li> </ul> </li> <li>• <u>Corrosive Material Gloves*</u> <ul style="list-style-type: none"> <li>10 pair minimum-either Neoprene, Nitrile, PVC, or equivalent</li> <li>Provide protection for hands when exposed to corrosive materials.</li> </ul> </li> <li>• <u>Response Gloves*</u> <ul style="list-style-type: none"> <li>20 pair minimum-either Norfoil, Silver Shield(TM), or equivalent.</li> </ul> </li> </ul>

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38. (cont)

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.

- Abrasion Resistant Gloves

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 prior to use.

Nonsparking Tools have been revised to indicate those maintained in the building for use in managing containers of flammable material. These 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, crowbar and hammer for use when managing wooden containers.

Spill Control Kits have been deleted from the list since any materials for 616 NRDWSF personnel response are already listed under other spill control and protective equipment. Any additional spill control equipment would be supplied by the emergency response organization which would be contacted as specified in Section 6.5 of the 616 Building Emergency Plan.

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 an emergency. The listing of the portable eyewash station in the receiving area has been deleted since it is not required and 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 their function. The reference to acid suits has also been deleted since these are not intended for emergency response by the 616 NRDWSF personnel.

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38. (cont)

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 which 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 the personnel appropriately trained in the use of SCBA and other equipment when necessary 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 potentially involving hazardous chemicals, thus an SCBA is available for the appropriate emergency responders.

Response Location in Revision 2: Appendix 7A.

39. Page 6-7, Section 6.3.2. The aisle space between the waste containers and the wall should be 3 feet.

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Ecology Requirement: Please amend this section appropriately.

DOE-RL/WHC Response #1: As specified in Washington Administrative Code 173-303-340(3), the 616 NRDWSF maintains sufficient aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment. The aisle spacings listed meet both the intent and letter of the National Fire Protection Association Codes and Washington Administrative Code. Please identify in writing the source of the requirement for a 3-foot aisle space.

Ecology Response: Under WAC 173-303-283, Ecology has the authority to set forth permit conditions necessary to protect public health and the environment. A 3-foot aisle space will be required. Modify the NRDWSF operations and permit application accordingly. See comment number 33.

DOE-RL/WHC Response #2: A new floor plan will be proposed that complies fully with NFPA and Life Safety Code requirements. These requirements are specifically designed to protect the employee, public, and environment.

Response Location in Revision 2: Page 6-7, lines 14-18.

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40.	<p>Page 6-9, Figure 6-3. Please refer to comment number 33. DOE-RL/WHC Response #1: Container storage locations will not change.</p> <p><u>Ecology Response:</u> A 3-foot aisle space is an Ecology requirement, also see comment number 33. DOE-RL/WHC Response #2: Please refer to the DOE-RL/WHC response #2 to comment number 39.</p> <p><u>Response Location in Revision 2:</u> Page F6-3, Figure 6-3.</p>	03/23/90
41.	<p>Page 6-11, Section 6.5.1. This paragraph states that water-reactive wastes are stored in waterproof cabinets in the flammable liquid storage cells. Figure 6-3 does not show these cabinets as part of the storage layout.</p> <p><u>Ecology Requirement:</u> Please modify Figure 6-3 accordingly. Similarly Figure 6-3 should show the location of other storage units (such as wall racks). DOE-RL/WHC Response #1: A new figure will be added showing storage location layout in the 616 NRDFS. This figure will show the locations of the floor storage areas and the open wire shelving. The weatherproof cabinets are designed to stand alone and will be placed in the flammable liquid storage cells on an as-needed basis. Hence, location of the cabinets will vary. The text will be modified to indicate that a 3-foot aisle space will be maintained between all shelving, cabinets, and adjacent drums.</p> <p><u>Ecology Response:</u> In addition to the above, clarify the potential locations of the weatherproof cabinets in these diagrams and/or in a text modification (for example, "the weatherproof cabinets are stand-alone units that will be placed in the double drum rows on an as needed basis as indicated in Figure X."). DOE-RL/WHC Response #2: The text and diagrams have been changed accordingly.</p> <p><u>Response Location in Revision 2:</u> Page 6-9, lines 46-48; page F6-3, Figure 6-3.</p>	03/23/90

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42.	<p>Page 7-1, Section 7.0. Paragraph 2 states this is a "summary emergency plan" This plan should not be a summary; it should be the entire emergency plan.</p> <p><u>Ecology Requirement:</u> Please modify accordingly.</p> <p>DOE-RL/WHC Response #1: The Contingency Plan found in Chapter 7 of the permit application is actually a compilation of specific requirements applicable to the facility that are maintained in several documents which constitute the Hanford Site emergency plan. The text will be modified to clarify this situation. The actual Contingency Plan for the 616 NRDSWF will be added to the permit application as an appendix when the revised plan is available per the Tri-Party Agreement compliance schedule (June 1990). However, specific names and phone numbers will not be included in this appendix for reasons of personal privacy.</p> <p><u>Ecology Response:</u> (1) The 'summary emergency plan' currently contained in the permit application is deficient; an actual working document as implemented at the facility must be provided as required under WAC 173-303-806(4)(a)(vii). (2) The actual Contingency Plan for the facility will be added to the permit application when available. (3) The inclusion of the names and phone numbers of specific people is addressed under comment number 43.</p> <p>DOE-RL/WHC Response #2: The actual facility emergency plan will be included as Appendix 7A.</p> <p><u>Response Location in Revision 2:</u> Appendix 7A.</p>	03/23/90
43.	<p>Page 7-3, Section 7-2. The emergency coordinator is not identified.</p> <p><u>Ecology Requirement:</u> The plan must identify (by name and position) the emergency coordinator for this facility.</p> <p>DOE-RL/WHC Response #1: The Contingency Plan currently identifies the emergency response phone number (811) and the Hanford Single Point of Contact (373-3800). By calling 811 or 373-3800, an individual (the Fire Department Battalion Commander and the Emergency Duty Officer) will be summoned who has the authority to act for the Building Emergency Director. The Fire Department Battalion Commander and the Emergency Duty Officer have the names and phone numbers of the primary and alternate Building Emergency Directors. The text will remain unmodified.</p> <p><u>Ecology Response:</u> The identification of the emergency coordinator will be addressed as part of the Hanford Site-wide permit. The permit application should refer to this document in addition to the above emergency phone numbers. It is not necessary to identify the emergency coordinator in the permit application. See also the 3rd bullet of comment number 85.</p>	03/23/90

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43.	<p>(cont) DOE-RL/WHC Response #2: The text has been so modified.</p> <p><u>Response Location in Revision 2:</u> Appendix 7A.</p>	
44.	<p><u>Page 7-3, Section 7.2.1, 2nd Paragraph.</u> The text states that the building emergency director is not on call 24 hours/day. The person who is on call must be familiar with the facilities and emergency procedures for this building.</p> <p><u>Ecology Requirement:</u> Please clarify the text to appropriately explain this.</p> <p><u>DOE-RL/WHC Response:</u> Those persons authorized to act for the building emergency director during his absences are provided with sufficient information, training, and authority to allocate resources to respond to any emergency situation at the 616 NRDSF. The Fire Department Battalion Commander and the Emergency Duty Officer have the names and phone numbers of the primary and alternate Building Emergency Director. The text will be modified to indicate that all persons authorized to act for the building emergency director have the authority to commit all resources necessary for resolving an emergency situation at the 616 NRDSF.</p> <p><u>DOE-RL/WHC Modified Response:</u> The actual facility emergency plan is included as Appendix 7A. The emergency plan identifies the individuals authorized to act for the Building Emergency Director.</p> <p><u>Response Location in Revision 2:</u> Appendix 7A.</p>	12/18/90

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45.	<p><u>Page 7-5, Section 7.2.2.</u> The first bullet identifies the 'Building warden' in the emergency organization. What is a building warden?</p> <p><u>Ecology Requirement:</u> Please clarify this position. <u>DOE-RL/WHC Response:</u> The building warden is a management individual assigned by the responsible building manager. Further discussion of the building warden's responsibilities is included in Section 7.2.2.1.3. The text will be modified to clarify this position.</p> <p><u>DOE-RL/WHC Modified Response:</u> The actual facility emergency plan is included as Appendix 7A. The emergency plan does not include a building warden in the emergency response organization.</p> <p><u>Response Location in Revision 2:</u> Appendix 7A.</p>	03/23/90
46.	<p><u>Page 7-5, Section 7.2.2.1.</u> This section briefly explains the 'Building Emergency Organization' without identifying these key personnel.</p> <p><u>Ecology Requirement:</u> Please identify these persons. <u>DOE-RL/WHC Response:</u> See response to comment number 43.</p> <p><u>Response Location in Revision 2:</u> Appendix 7A.</p>	12/18/90
47.	<p><u>Page 7-14, Section 7.3.</u> The text discusses the NRDWSF emergency plan. This plan is apparently not included in this document.</p> <p><u>Ecology Requirement:</u> Please include the emergency plan in this document for review and approval. <u>DOE-RL/WHC Response #1:</u> See response to comment number 42.</p> <p><u>Ecology Response:</u> See response to comment number 42. <u>DOE-RL/WHC Response #2:</u> The actual facility emergency plan will be included as Appendix 7A.</p> <p><u>Response Location in Revision 2:</u> Appendix 7A.</p>	03/23/90

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48.	<p><u>Page 7-18, Section 7.4.1.3, 1st Bullet.</u> The text references reportable quantities for notifications of releases. The State of Washington Dangerous Waste Regulations do not use reportable quantities for notification and response purposes.</p> <p><u>Ecology Requirement:</u> Please strike any reference to reportable quantities for releases to the environment. Ecology will address this issue on a site-wide basis in the General Hanford Permit. For purposes of this application, Ecology will provide guidance to Energy prior to the next NOD response cycle.</p> <p><u>DOE-RL/WHC Response #1:</u> Text associated with reportable quantities for notification of releases will be removed. Ecology guidance will be addressed when provided.</p> <p><u>Ecology Response:</u> Under the provisions of WAC 173-303-145, spills and discharges must be reported immediately. Ecology is currently preparing guidelines for consistent interpretation of the requirements of this regulation; a copy of this will be sent to the DOE and Westinghouse Hanford as soon as it is available.</p> <p><u>DOE-RL/WHC Response #2:</u> Text associated with reportable quantities for notification of releases has been removed. Ecology guidance will be addressed when provided.</p> <p><u>Response Location in Revision 2:</u> Appendix 7A.</p>	03/23/90
49.	<p><u>Page 7-18, Section 7.4.1.3, 4th Bullet.</u> The Ecology telephone number is the general Ecology reception number. The notification number for the Hanford Site should be (206) 438-7016.</p> <p><u>Ecology Requirement:</u> Please modify this bullet accordingly.</p> <p><u>DOE-RL/WHC Response:</u> The Ecology phone number will be included in the text.</p> <p><u>Response Location in Revision 2:</u> Page 2-16, line 2.</p>	03/23/90

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50.	<p><u>Page 7-20, Section 7.4.2, 5th Bullet.</u> The fifth bullet discusses the possibility of permanent stabilization of spills. If clean closure is the strategy for this facility and Ecology agrees not to insist on a Postclosure Plan for this facility, permanent stabilization is not an option for spill remediation.</p> <p><u>Ecology Requirement:</u> Either strike this language and revise any internal spill response procedures to ensure full removal of any release or submit a Postclosure Plan for addressing permanent stabilization as an option for spill remediation.</p> <p><u>DOE-RL/WHC Response:</u> Text associated with the permanent stabilization of spills will be removed.</p>	03/23/90
51.	<p><u>Response Location in Revision 2:</u> Page 2-17, lines 6-10.</p> <p><u>Page 7-32, Section 7.4.16.1.</u> The text mentions seismic activity as a potential natural event which could effect 616 NRDWSF operations. There is, however, no discussion in the application as to the facility's design capability of withstanding such an event.</p> <p><u>Ecology Requirement:</u> Please state the size of earthquake which the 616 NRDWSF could withstand without structural damage.</p> <p><u>DOE-RL/WHC Response:</u> The text has been modified to indicate that the 616 NRDWSF was designed in accordance with the Hanford Plant Standards, Standard Design Criteria - 4.1. This plant standard provides seismic load criteria specific to the Hanford Site.</p> <p><u>Response Location in Revision 2:</u> Page 2-9, lines 16-20.</p>	03/23/90
52.	<p><u>Page 7-33, Section 7.4.16.3.</u> The last section on this page discusses the procedures to be implemented in case of an emergency power outage. The third bullet of this procedure states the outside doors will be opened and the inside doors will be closed "[i]f instructed by supervision, ..." The staff should be trained to the point that they could make this determination without approval from 'supervision'.</p> <p><u>Ecology Requirement:</u> Please modify this section accordingly or justify otherwise.</p> <p><u>DOE-RL/WHC Response #1:</u> The staff may not be fully aware of all conditions (e.g. high winds, fire, etc.) associated with the power outage/ventilation loss. Since the decision to open the outer building doors may be dependent on several factors that could potentially complicate the situation, this decision is better left to the discretion of supervision. The text will remain unmodified.</p>	03/23/90

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52.	<p>(cont)</p> <p><u>Ecology Response:</u> Demonstrate that supervision will always be available to make this type of decision. See comment number 85.</p> <p>DOE-RL/WHC Response #2: The actual facility emergency plan is included as Appendix 7A. The emergency plan addresses actions to be taken in response to a power outage/ventilation loss.</p> <p><u>Response Location in Revision 2:</u> Appendix 7A.</p>	
53.	<p><u>Page 7-37, Figure 7-4.</u> This map is not readable.</p> <p><u>Ecology Requirement:</u> Please resubmit this map in a large scale.</p> <p>DOE-RL/WHC Response: The map will be changed to improve readability.</p> <p>DOE-RL/WHC Modified Response: The actual 616 Building Emergency Plan is included as Appendix 7A. The emergency plan does not include this map.</p> <p><u>Response Location in Revision 2:</u> Not applicable.</p>	03/23/90
54.	<p><u>Page 7-44, Section 7.6.5.</u> This paragraph discusses the Hanford Exposure Evaluator. There is, however, no discussion of what this is.</p> <p><u>Ecology Requirement:</u> Please explain in the text of this section what the Hanford Exposure Evaluator is.</p> <p>DOE-RL/WHC Response: The text will be modified to further detail the role of the Hanford Exposure Evaluator.</p> <p>DOE-RL/WHC Modified Response: The actual facility emergency plan is included as Appendix 7A. The emergency plan does not include any reference to the Hanford Exposure Evaluator.</p> <p><u>Response Location in Revision 2:</u> Not applicable.</p>	03/23/90

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55.	<p><u>Page 11-2, Section 11.1.1.1.</u> This section discusses the decontamination of the equipment and concrete in the facility. The text states that decontamination will continue until the rinsate is no longer designated. The determination for decontamination will not be the solution but will be based upon how clean the equipment or concrete is.</p> <p><u>Ecology Requirement:</u> Please revise this section to properly address the decontamination of equipment and concrete. This must include established cleanup levels (to include sample verification) of the material in question.</p> <p><u>DOE-RL/WHC Response #1:</u> Verification wipe sampling will be performed on the concrete and accessible portions of the equipment which will have been in contact with contaminated materials. As with wipe sampling conducted in association with other sampling, detection of constituents of concern will initiate further action. In this case further decontamination will be conducted.</p> <p><u>Ecology Response:</u> Elaborate and clarify what is meant by accessible and "further decontamination." Note that destructive testing may be required in cases where small gaps and structural flaws have been exposed to potential contaminants. Refer to the latest version of the <i>2727-S Nonradioactive Dangerous Waste Storage Facility Closure Plan</i> for guidance.</p> <p><u>DOE-RL/WHC Response #2:</u> The text has been modified to clarify decontamination of equipment along with associated verification sampling. Sampling of structural flaws and gaps will be addressed prior to sampling at closure.</p> <p><u>Response Location in Revision 2:</u> Page 11-2, lines 6-50.</p>	03/23/90
56.	<p><u>Page 11-2, Section 11.1.1.1, 2nd Paragraph.</u> The text states that background will be taken by coring the walkway. This is not adequate. Background will need to be at a point outside the potential area of impact. This would ideally be at a point outside of any of the operative (100, 200, etc.) areas.</p> <p><u>Ecology Requirement:</u> Please rewrite this section to include a more appropriate background sampling point. This comment applies to all discussions on background sampling in this application.</p>	

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56.	<p>(cont)</p> <p>DOE-RL/WHC Response No. 1: Background ideally is located in uncontaminated material identical to the potentially contaminated material being assessed for concrete. A background sample must be taken in the same pour as the sample to be assessed for contamination (same aggregate and concrete). The appropriate location for such sampling is the walkway in the 616 NRDWSF, because:</p> <ol style="list-style-type: none"><li>(1) No waste handling operations ever occurred there</li><li>(2) The walkway is sealed</li><li>(3) The top portion of the concrete will be removed before analysis. Variability of concrete, due to different sources of cement and aggregate, requires selection of background in the same pour as the concrete being assessed for contamination. In the case of the 616 NRDWSF, no other appropriate background sampling location besides the walkway are considered appropriate.</li></ol> <p><u>Ecology Response No. 1:</u> This will be sufficient, however, it will also be necessary to provide a comparison for the onsite background sample to determine that any contamination is not due to a facility-wide contamination.</p> <p>DOE-RL/WHC Response No. 2: The text has been revised to indicate that background threshold concentrations and significance levels will be based on information including mean concentrations and variance for each constituent of concern. Specific approaches and the criteria and assumptions implicit in establishing concentration levels that constitute significant deviation from background or other control levels will be consistent with the outcome of background discussions currently underway with Ecology and the EPA.</p> <p><u>Ecology Response No. 2:</u> Page 11-2, line 39. The text states "... background samples will be compared to suitable samples to verify comparability of the data." It is not clear what this statement means. The intent of the original requirement was to ensure that the background samples taken at the 616 NRDWSF are not subject to contamination present throughout this TSD unit.</p> <p><u>Ecology Requirement:</u> Revise the text so there is verification that the background samples taken at the 616 NRDWSF are not subject to contamination present throughout this TSD unit.</p> <p>DOE-RL/WHC Response No. 3: The text has been revised to clarify the establishment of background levels for the 616 NRDWSF.</p>	

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56. (cont)
- Ecology Response No. 3: The text revision for the first paragraph after the bullets in Section 11.1.1.1 is not in agreement with the clean closure performance standards of WAC 173-303-610(2)(b) (cleanup to background or designation limits, as appropriate). The requirements of this regulation must be met for clean closure. Revise the text here and elsewhere accordingly.
- The revised text of Section 11.1.1.2 is not in agreement with the clean closure performance standards of WAC 173-303-610(2)(b). The requirements of this regulation must be met for clean closure. Revise the text here and elsewhere accordingly.
- All sampling and analysis must be done using procedures equivalent to those stipulated in WAC 173-303-110 unless prior approval is obtained from Ecology. In addition, these testing methods must be applied appropriately. For example, USDOE proposes to analyze wipe samples using the TCLP method. This is inappropriate, TCLP is designed to determine the mobility of contaminants if they are present. The next revision must clearly present the sampling and analysis techniques to be used (in tabular form as well as text). This closure plan must be in a usable form; to achieve this a reevaluation and revision of the planned sampling and analyses is necessary. Refer to the 303-K Concretion Closure Plan in development and its associated Notices of Deficiency for guidance.
- The proposed text still does not address Ecology's concerns regarding widespread contamination at this unit. In no case may background samples be obtained within the unit itself without additional information regarding contaminant levels in concrete samples not subject to prior contamination. Refer to previous Ecology comments on this topic for guidance.
- DOE-RL/WHC Response No. 4:** The text has been revised to address the above issues.
- Ecology response No. 4: As noted above, this comment addresses in part the determination of background as part of the Hanford Site-Wide Part B Permit. In addition, this comment covers correct utilization of sampling and analytical methods. To reiterate the previous NOD's, sampling and analysis must be in accordance with WAC 173-303-110 and must be appropriately implemented. The next revision must clearly present the sampling and analysis methods to be used (in tabular form as well as text). This closure plan must be in a usable form; to achieve this a reevaluation and revision of the planned sampling analyses is necessary. Refer to the 304 Concretion Closure Plan in development and its associated Notices of Deficiency for guidance.

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56.	<p>(cont) DOE-RL/WHC Response No. 5: The text has been revised to address the above issues.</p> <p><u>Response Location in Revision 2:</u> Page 11-2, lines 6-50.</p>	
57.	<p><u>Page 11-8, Section 11.1.4.3.</u> The text describes the process for decontaminating the walls of the facility. There is, however, no discussion of verification sampling.</p> <p><u>Ecology Requirement:</u> Please revise this section to include verification sampling. This comment is also applicable to the discussion in Section 11.1.4.3.1 (Sampling and Decontamination of Concrete Floor). DOE-RL/WHC Response No. 1: Verification sampling has been incorporated into the text.</p> <p><u>Ecology Response No. 1:</u> Page 11-8, line 11. The text has been revised to indicate that the rinsate from decontaminating the walls will be designated. Designating the rinsate will not show that the walls are free of contamination, as was the intent of this requirement.</p> <p><u>Ecology Requirement:</u> Revise the permit application to reflect that the walls will be subject to verification sampling and analysis after decontamination. See page 11-2, lines 26 through 28. DOE-RL/WHC Response No. 2: The text has been revised to incorporate verification sampling and analysis after decontamination.</p> <p><u>Ecology Response No. 2:</u> Although the text has been revised to state, "If the analyses of the wipe samples indicate that <i>significant</i> contamination is present, the walls will be decontaminated until the sampling demonstrates the walls to be clean," there is no definition of what is meant by significant. This is a symptom of the overall lack of quality assurance and quality control in this plan in its present form. Revise the closure plan so that there is adequate quality assurance and quality control. Refer to the <i>Hanford Federal Facility Agreement and Consent Order</i>, Section 6.5, for guidance. DOE-RL/WHC Response No. 3: The text has been revised to address the above issues.</p>	

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57.	<p>(cont)</p> <p><u>Ecology Response No. 3:</u> USDOE/WHC proposes to address QA/QC concerns in the next permit application submittal according to a comment resolution summary received at the March 12, 1991, Unit Manager's Meeting. However, this topic was not addressed in the most recent submittal. To reiterate USDOE/WHC must have an adequate QA/QC program in operation. This program must be in accordance with EPA guidance and the Tri-Party Agreement, and it must be integrated with the Hanford Site-Wide QA/QC program.</p> <p><u>DOE-RL/WHC Response No. 4:</u> The text has been revised to address the above issues.</p> <p><u>Response Location in Revision 2:</u> Page 11-5, line 26 through page 11-21, line 36.</p>	
58.	<p><u>Page 11-11, Section 11.1.4.3.2, 2nd Paragraph.</u> The text discusses decontamination of the north "and/or" east loading pads. Both of these pads must be included in the sampling and decontamination process.</p> <p><u>Ecology Requirement:</u> Please revise this section appropriately.</p> <p><u>DOE-RL/WHC Response:</u> The text will be revised accordingly.</p> <p><u>Response Location in Revision 2:</u> Page 11-3, line 33; page 11-9, lines 37-39.</p>	03/23/90
59.	<p><u>Page 11-11, Section 11.1.4.3.2, 2nd Paragraph.</u> This paragraph also discusses the grid sampling process for the pads and the soils immediately surrounding the pads. There is no clear discussion of how extensive the grid will be in incorporating the adjacent soils.</p> <p><u>Ecology Requirement:</u> Please expand this discussion to better clarify the extent of soil sampling (horizontal). The plan must extend several grid sizes off of the cement pad.</p> <p><u>DOE-RL/WHC Response:</u> A defined approach for expanding the grid size off the pad has been incorporated into the text. The grid has been expanded at least one grid size off of the pad, but the number of samples will remain the same.</p> <p><u>Response Location in Revision 2:</u> Page 11-9, lines 43-47.</p>	03/23/90

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60.	<p>Page 11-12, Section 11.1.4.3.2. The first partial paragraph on this page states that soil samples will only be collected on the surface. This is not acceptable.</p> <p><u>Ecology Requirement:</u> The soil sampling must occur to a prescribed depth. Please revise this section to include vertical sampling of the soils.</p> <p><u>DOE-RL/WHC Response #1:</u> A reading of the text reveals that samples will be taken at 1 foot intervals until background levels are achieved for soils; however, the text will be reworded to make this strategy more obvious. Samples will be taken initially at the surface, 1 foot, and 3 feet. Soil removal will commence based on these results. Verification sampling will be included.</p> <p><u>Ecology Response:</u> The depths at which sampling are planned are inconsistent; if the sampling is to occur at 1-foot intervals, then the samples should be taken at the surface, 1 foot, 2 feet, etc. Clarify this in the text.</p> <p><u>DOE-RL/WHC Response #2:</u> The text will be revised accordingly.</p> <p><u>Response Location in Revision 2:</u> Page 11-10, lines 13-16.</p>	03/23/90
61.	<p>Page 11-12, Section 11.1.4.4. The proposed constituents for analysis in sampling the tile and french drain systems are to be limited to those of documented spills. Due to the potential constituents which may be discharged to these systems, a full Appendix IX analysis must be accomplished.</p> <p><u>Ecology Requirement:</u> Please modify this section accordingly.</p> <p><u>DOE-RL/WHC Response:</u> The text will be modified accordingly.</p> <p><u>Response Location in Revision 2:</u> Page 11-6, lines 41-46.</p>	03/23/90
62.	<p>Page 11-12, Section 11.1.4.4, 2nd Paragraph. The text states that one core sample will be taken in the french drain system. This is inadequate.</p> <p><u>Ecology Requirement:</u> Please revise this section to include a more comprehensive sampling and analysis plan for this site.</p> <p><u>DOE-RL/WHC Response #1:</u> Due to the small size of the french drain and the apparent homogeneity of the contamination source (fluid), one sample is considered adequate. A detailed drawing of the french drain will be provided (see response to comment number 8).</p>	03/23/90

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| 62. | <p>(cont)</p> <p><u>Ecology Response:</u> It is not possible to determine if one sample will be adequate without the design drawings and specifications or the existing sampling plan, this issue will be determined after their receipt. Note also that it is possible for contaminants entering the french drain to percolate through the receiving soil column; any sampling plan must take this into account unless there are other mitigating factors. Include the design drawings and specifications and the modified sampling plan within the permit application. In addition, note that the statement that the contamination source is apparently homogeneous is not scientifically sound, for example, both oil and water are liquids, yet they form immiscible layers when mixed together and are incontrovertibly heterogeneous.</p> <p>DOE-RL/WHC Response #2: Design drawings and specifications of the french drain have been provided. Details of the sampling plan will be included in the text.</p> <p><u>Response Location in Revision 2:</u> Page F2-6, Figure 2-6; Appendix 4B; page 11-11, lines 1-10.</p> |                        |
| 63. | <p><u>Page 11-16, Section 11.1.7.</u> This section discusses potential extensions for the 180 day closure completion time limit. Lack of Congressional funding is given as an example of a reason for requesting an extension. Congressional funding is not an acceptable reason for requesting an extension.</p> <p><u>Ecology Requirement:</u> Delete the reference to Congressional funding.</p> <p>DOE-RL/WHC Response: The reference will be deleted. However, the impact that inadequate funding levels can have on the scope and schedule of planned work is addressed in Article XLVII and Article XLVIII of the Tri-Party Agreement. It is implicit that the funding discussions included under these two Articles would apply to activities outlined in this permit application.</p> <p><u>Response Location in Revision 2:</u> Page 11-23, lines 7-14.</p>   | 03/23/90               |

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64.	<p><u>Page 11-17, Section 11.3.</u> At present there is no Postclosure Plan incorporated in the application. Due to the nature of this facility, Ecology agrees that clean closure is realistic and hence will not require submission of a Postclosure Plan at this time. This position will be evaluated yearly based upon the operating record of the facility. If at any time Ecology determines that releases to the environment have occurred and inappropriate responses have been made, a requirement for preparation and inclusion of a Postclosure Plan into the permit will be made. This annual facility review will be included in the permit once it is issued.</p> <p><b>DOE-RL/WHC Response:</b> Every effort will be made to operate the facility so that it may be clean closed.</p> <p><b>Response Location in Revision 2:</b> Not applicable.</p>	03/23/90
65.	<p><u>Page 11-17, Section 11.6.</u> The closure cost estimate references the federal regulations. The plan must reference the appropriate state regulation.</p> <p><b>Ecology Requirement:</b> Please revise this section to include the proper state citation.</p> <p><b>DOE-RL/WHC Response:</b> The text will be modified accordingly.</p> <p><b>Response Location in Revision 2:</b> Page 11-24, line 17.</p>	03/23/90
66.	<p><u>Page 12-4, Table 12-1.</u> The table erroneously shows that the Closure Cost estimates are not required. Please refer to comment number 65.</p> <p><b>Ecology Requirement:</b> Please modify the table accordingly.</p> <p><b>DOE-RL/WHC Response No. 1:</b> The WAC 173-303-620(1)(c) exempts federal facilities from the requirements of closure cost estimates as stated in WAC 173-303-620(3)(a).</p> <p><b>Ecology Response No. 1:</b> Federal facilities are exempt from this requirement as cited above, however, under WAC 173-303-620(1)(c), "...operators of facilities who are under contract with the...federal government must meet the requirements of this section." On page iii of this permit application it states, "Westinghouse Hanford Company...serves as co-operator of the 616 Nonradioactive Dangerous Waste Storage Facility..." Therefore, the closure cost estimates required under WAC 173-303-620 must be provided.</p>	07/8/91

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| 66. | <p>(cont)</p> <p>DOE-RL/WHC Response No. 2: It is the view of DOE-RL/WHC that the financial requirements of WAC 173-303-620 do not apply to Westinghouse Hanford. Insofar as the legal operating status of the waste management unit includes both the DOE-RL and Westinghouse Hanford (as co-operator), and does not expressly recognize Westinghouse Hanford as the sole operator of any RCRA waste management unit, the government exemption applies. This view is consistent with 40 CFR 264.140 (c), which exempts states and the federal government from the financial requirements of 40 CFR 264, Subpart H. The text will remain unmodified.</p> <p><u>Ecology Response No. 2:</u> General Comment. It is stated that because Westinghouse Hanford Company is a co-operator, requirements for closure cost estimates do not need to be met. The apparent difference between an operator and a co-operator is one of semantics.</p> <p><u>Ecology Requirement:</u> Closure cost estimates must be provided.</p> <p>DOE-RL/WHC Response No. 3: The DOE-RL/WHC response remains the same as Response No. 2 above.</p> <p><u>Ecology Response No. 3:</u> The Ecology response remains that closure cost estimates are required.</p> <p>DOE-RL/WHC Response No. 4: The DOE-RL/WHC have agreed to provide updated projections of anticipated closure and postclosure costs for the Hanford Facility in accordance with WAC 173-303-390 by October 30 (beginning in 1992).</p> <p><u>Response Location in Revision 2:</u> Page 11-24, lines 22-24.</p> |                               |
| 67. | <p><u>Page 12-9, Section 12.4.1.6.1.</u> The last paragraph on this page discusses notification procedures. Ecology does not have reportable quantities as a trigger for notification of releases. We require notification of any release. Please refer to comment number 48.</p> <p><u>Ecology Requirement:</u> Please revise this section accordingly.</p> <p>DOE-RL/WHC Response: The text has been modified to refer to the reportable quantities identified in WAC 173-303-145 (also see response to comment number 48).</p> <p><u>Response Location in Revision 2:</u> Page 12-7, lines 19-21.</p>  | 03/23/90                      |

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68.	<p><u>Page 12-15, Section 12.4.2.3.3.</u> The closure cost estimate references the federal regulations. The plan must reference the appropriate state regulation. DOE-RL/WHC Response: The text will be modified accordingly.</p> <p><u>Response Location in Revision 2:</u> Page 12-12, line 28.</p>	03/23/90
69.	<p><u>Appendix 2B-ii.</u> This appendix gives "Sample Procedures". Sample procedures are not adequate. The actual procedures must be given. This appendix will not be reviewed until the actual procedures are given. It should be noted that changes in the procedures (after the permit has been issued) would not require a major modification of the permit in most cases.</p> <p><u>Ecology Requirement:</u> Please submit the actual procedures for 616 NRDWSF operations for review and approval. DOE-RL/WHC Response: The WAC-173-303-806(a)(viii) requires only "A description of procedures..." Because the 616 NRDWSF is operating, the procedures can change quite frequently depending on conditions and management practices. The sample procedures supplied cover the basic methods of operation of the facility. Current operating procedures can be viewed at any time at the facility.</p> <p><u>Ecology Response:</u> Under WAC 173-303-806(4), descriptions are adequate in some cases. For example, only descriptions required for security procedures [WAC 173-303-806(4)(a)(iv)] or containment systems [WAC 173-303-806(4)(b)(i)]. Note, however, in some instances that although the actual procedures may not be required, they may be necessary to provide an adequate description. In other cases, copies of the actual procedures in use at the facility are required and descriptions may not be substituted. In particular, under WAC 173-303-806(4)(a)(vii), "[a] copy of the contingency plan [as] required under WAC 173-303-350..." must be submitted. Therefore, copies of the documents in use at the facility must be submitted in all instances they are required as part of the permit application under WAC 173-303. DOE-RL/WHC Response #2: A description of operations will be provided as required by WAC 173-303. All sample procedures and references to such will be removed from the permit application.</p> <p><u>Response Location in Revision 2:</u> Applicable throughout text.</p>	03/23/90

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70.	<p><u>Appendix 8A-ii.</u> This appendix gives "Sample Training Course Summaries". Sample summaries are not adequate. The actual course descriptions are required (see comment number 69).</p> <p><u>Ecology Requirement:</u> Please submit the actual training course descriptions for review and approval.</p> <p><u>DOE-RL/WHC Response:</u> Response: The WAC-173-303-806 requires only an outline and description of training. Training course summaries can change quite frequently due to changes in procedures, conditions, and management practices. The sample training course summaries which have been supplied are descriptions based on information extracted from actual training course summaries for 616 required training. However, it would be difficult to provide current training course summaries due to their mutability. Current training information can be viewed at any time at the facility.</p> <p><u>DOE-RL/WHC Modified Response:</u> All references to sample training course summaries will be removed from the text.</p> <p><u>Response Location in Revision 2:</u> Appendix 8A.</p> <p>** The following comments were received from Ecology on January 23, 1990 and are considered to be a supplement to the NOD received on November 21, 1989. **</p>	03/23/90
71.	<p><u>Page 2-10, Section 2.2.</u> The requirements under WAC 173-303-806(4)(a) for the topographical map have not been met by Plate 2-2. There are several deficiencies.</p> <p><u>Ecology Requirement:</u> The map must show 1,000 feet around the facility; it currently depicts approximately 730 feet on the east and west sides. The map should also show any wells or sewers; none are shown. Although loading zones seem to be included, these are not clearly shown and may be confused with the structure or access roads. Please note that more than one map may be submitted to fulfill these requirements.</p> <p><u>DOE-RL/WHC Response:</u> The map(s) has been modified to correct the noted deficiencies.</p> <p><u>Response Location in Revision 2:</u> Appendix 2A, Drawing No. H-13-000014.</p>	03/23/90

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72.	<p><u>Page 2-22, Section 2.8.1.</u> The plan states that when chemical wastes are received at the facility, "[s]ignificant discrepancies are noted on the first page of the manifest." It further states that copies of the manifest will be kept 'indefinitely'.</p> <p><u>Ecology Requirement:</u> Discrepancies should be noted on every copy of the manifest under WAC 173-303-370. Copies of the manifests should be kept for three years. Please amend all appropriate sections of the plan.</p> <p><u>DOE-RL/WHC Response:</u> Manifesting of onsite shipments is not required, however waste tracking forms are voluntarily used for onsite waste shipments. The text was modified to require that significant discrepancies be noted on all copies of the waste tracking form.</p> <p><u>Response Location in Revision 2:</u> Page 2-18, lines 43-44 and lines 51-52.</p>	03/23/90
73.	<p><u>Page 3-5, Section 3.2.</u> In the Waste Disposal Analysis it states that a review of the waste will be performed from information supplied by the generator. "If the information provided is correct and adequate, the TSD technical staff performs the following...", emphasis added.</p> <p><u>Ecology Requirement:</u> Describe this review. Is there any analytical verification of generator information? State what steps will be taken if the information provided is not correct or adequate.</p> <p><u>DOE-RL/WHC Response No. 1:</u> The text has been modified to indicate that no analytical verification of generator information is performed (also see response to comment number 14). The text has been modified to include the steps that are taken when inadequate information is provided by the generator.</p> <p><u>Ecology Response No. 1:</u> General Comment. Verification of waste designation is addressed.</p> <p><u>Ecology Requirement:</u> Refer to comment number 14 for requirement.</p> <p><u>DOE-RL/WHC Response No. 2:</u> Refer to comment number 14 for response.</p> <p><u>Ecology Response No. 2:</u> Refer to comment number 14.</p> <p><u>DOE-RL/WHC Response No. 3:</u> This issue is being resolved as part of the Hanford Facility Part B Permit.</p> <p><u>Response Location in Revision 2:</u> Page 3-3, lines 31-39.</p>	

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74.	<p><u>Page 3-17, Table 3-6.</u> The first NOD (submitted 11/21/89) states that this table needs to be enlarged for clarity. Note also that there is no key provided for the first table; it is meaningless without it.</p> <p><u>Requirement:</u> Please enlarge these tables and provide keys for their interpretation. DOE-RL/WHC Response: The tables have been enlarged and appropriate keys will be provided.</p> <p><u>Response Location in Revision 2:</u> Page F3-4, Figure 3-4.</p>	12/18/90
75.	<p><u>Page 4-4, Sections 4.1.1.3 through 4.1.1.7.</u> It is not possible to verify the assertions about safety features because the facility is not adequately described or illustrated.</p> <p><u>Requirement:</u> Please submit copies of the contract design and specifications as well as any design reports available. DOE-RL/WHC Response: Please identify the safety features that are not adequately detailed so that additional information can be considered for incorporation into the permit application.</p> <p>DOE-RL/WHC Modified Response: The facility construction specification and design drawings have been provided as appendices.</p> <p><u>Response Location in Revision 2:</u> Appendices 4A and 4B.</p>	03/23/90
76.	<p><u>Page 6-10, Section 6.4.5.</u> The plan states that 'clean new containers' may be handled while wearing a less protective level of clothing than that required when handling waste containers.</p> <p><u>Ecology Requirement:</u> The less protective level of clothing is appropriate only for <u>empty</u> unused new containers. Please amend the text accordingly. DOE-RL/WHC Response: The text will be modified accordingly.</p> <p><u>Response Location in Revision 2:</u> Page 6-9, lines 13-14.</p>	03/23/90

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77.	<u>Page 7-21, Section 7.4.3.</u> The text discusses 'protective action guidelines.'	03/23/90
	<u>Ecology Requirement:</u> Please define these guidelines. <u>DOE-RL/WHC Response:</u> The text will be modified to define the 'protective action guidelines'.  <u>DOE-RL/WHC Modified Response:</u> The Emergency Plan (WHC-CM-4-1) referenced in Chapter 7.0 defines 'protective action guidelines'.  <u>Response Location in Revision 2:</u> Not applicable.	
78.	<u>Page 11-1, Section 11-1.</u> The plan states "[p]rior to the end of the 20-year design life, the facility will be evaluated..." Under WAC 173-303-806(11)(a), the maximum length of time that a permit may be written for is 10 years. At the end of the permit life-span, the facility will need to be re-permitted; an evaluation will be necessary at this time.	03/23/90
	<u>Ecology Requirement:</u> The plan should be amended to include a facility evaluation at the end of the permit life. <u>DOE-RL/WHC Response:</u> The text has been modified to indicate that the facility will be evaluated at the end of the permit life.  <u>Response Location in Revision 2:</u> Page 11-1, lines 22-26.	
79.	<u>Page 11-1, Section 7.4.3.</u> The third bullet has language inconsistent with the closure performance standard under WAC 173-303-610(2)(a).	03/23/90
	<u>Ecology Requirement:</u> The plan should be amended to reflect the applicable regulatory standard. The current language is appropriate only if the facility will be re-permitted and/or used for other purposes after closure; this should be clearly stated. <u>DOE-RL/WHC Response:</u> The text has been modified to reflect the applicable regulatory standard.  <u>Response Location in Revision 2:</u> Page 11-1, lines 49-51.	

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80.	<p><u>Page 11-9, Section 11.4.3.1.</u> The plan states that SW-846 (EPA 1986) or equivalent analytical testing methods will be used. Under WAC 173-303-110(3)(c), the most current edition and all updates of SW-846 are adopted for test procedures.</p> <p><u>Requirement:</u> Please amend the text here and in all other appropriate sections so that it is consistent with the Dangerous Waste Regulations. <u>DOE-RL/WHC Response:</u> The text will be so modified.</p> <p><u>Response Location in Revision 2:</u> Chapter 11.0.</p>	03/23/90
81.	<p><u>Page 1-1, Section 1.1.</u> The permit application states that the facility will be permitted under WAC 173-303-630. The facility will be permitted under WAC 173-303-806.</p> <p><u>Ecology Requirement:</u> Modify the text accordingly. <u>DOE-RL/WHC Response:</u> The text will be so modified.</p> <p><u>Response Location in Revision 2:</u> Page 1-1, line 14.</p>	03/23/90
82.	<p><u>Page 2-10, Section 2.1.2.6.</u> The permit application states that if a dangerous waste spill occurs in a loading area, the concrete slab will be cleaned and triple rinsed. It is not clear how it will be determined that the contaminants have been removed.</p> <p><u>Ecology Requirement:</u> Describe the method used to determine that the spill area is no longer contaminated. Refer to the <i>2727-S Nonradioactive Dangerous Waste Storage Facility Closure Plan</i> for guidance. <u>DOE-RL/WHC Response:</u> The text will be modified to include sampling of spill areas to verify cleanliness.</p> <p><u>Response Location in Revision 2:</u> Page 2-8, lines 18-19; page 4-5, lines 1-49, page 4-6, lines 1-52.</p>	03/23/90
83.	<p><u>Page 6-6.</u> The safety shower located in the acid cell has no containment barrier to prevent mixing of the incompatible water and acids.</p> <p><u>Ecology Requirement:</u> This may be corrected in two ways, 1) construct a containment barrier which will prevent flow of water into areas where acid spills will also flow, or 2) move the</p>	07/8/91

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83. (cont)  
 shower to an area where uncontrolled water flow could not result in mixing with incompatible materials.  
 DOE-RL/WHC Response No. 1: The acid and combustible storage cells have been switched to prevent the mixing of incompatible materials.

Ecology Response No. 1: Page 2-3, line 39. Different hazard class categories have been assigned to the storage cells in order to avoid chemical incompatibility between the safety shower water and spilled waste acids. Although the original comment stated that it was inappropriate to store waste acids in the cell with this shower, it was not clearly stated that all chemical incompatibilities should be avoided. The permit application now states that combustibles are stored in the cell with the safety shower and furthermore, caustic waste may be stored here on an overflow basis. However, storage of caustic materials in this cell is also inappropriate because of their chemical incompatibility with water as well as some halogenated organic chemicals.

Ecology Requirement: Evaluate the compatibilities of the various wastes that are received in the 616 NRDWSF. Develop a table of hazard class compatibilities based on this evaluation that designates an alternate class cell(s) for overflow storage of dangerous waste containers. Include this table in the permit application. The text and operations must be modified so that the following requirements are met.

- Dangerous wastes of one hazard class must be stored in a cell of the same hazard class unless that storage cell's capacity is exceeded.
- If a storage cell's capacity is exceeded and overflow storage is needed, then containers may be stored only in the cells of the hazard class(es) stipulated by the table.
- If containers of more than one hazard class must be stored in the packaging and sampling room, then the container's contents must be of compatible hazard classes according to the table.
- If the storage space available does not meet the above requirements, then the waste will not be accepted at the 616 NRDWSF.

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83.	<p>(cont) DOE-RL/WHC Response No. 2: A table of hazard class compatibilities has been included in the permit application. The text has been modified to provide guidelines for overflow storage of dangerous waste containers.</p> <p><u>Response Location in Revision 2:</u> Page 2-4, lines 46-51; page 2-5, lines 1-12; page F2-5, Figure 2-5.</p>	
84.	<p><u>Page APP 2B-2, Section III, Safety, 2nd Set of Bullets.</u> The permit application states that when handling "unused, new containers" a less protective level of safety equipment may be worn than when handling dangerous waste containers.</p> <p><u>Ecology Requirement:</u> These lower protective standards should only apply in the case of <u>empty</u>, unused, new containers. Modify this section and all other applicable sections accordingly.</p> <p>DOE-RL/WHC Response: The text has been so modified.</p> <p><u>Response Location in Revision 2:</u> Page 6-9, lines 13-14.</p>	03/23/90
85.	<p><u>Page APP 2B-12, Section III.</u> Within the 'Sample Procedures' there are a number of conflicting and confusing requirements. The following quotes are an example of this:</p> <p>p 2B-4 "NOTE -- The hazardous Materials Response Team must be called if a ruptured container is identified."</p> <p>p 2B-12 "Supervision shall determine if the ... Hazardous Materials Response Team is needed."</p> <p>There are also numerous cases where the assignment of responsibility is ambiguous, the following are examples:</p> <p>p 2B-15 "Notify Industrial Safety and Fire Protection and Solid Waste Engineering if not already notified by the Hanford Fire Department or supervision.</p> <p>p 2B-15 It is not clear whether the building supervisor, the Fire Marshall, or someone else is in charge of the Hazardous Materials Response Team.</p>	07/8/91

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85. (cont)

Ecology Requirement: Rewrite and submit actual procedures or descriptions as required under WAC 173-303-806 for this facility that fulfill the following:

- Different sections within the permit application must be consistent, in other words, different sections should not contain conflicting requirements.
- The procedures must clearly state who is responsible for certain tasks. Performance of necessary actions must be the responsibility of one person, not a multitude.
- A clear and comprehensible chain-of-command must be delineated for this facility. In no cases should responsibility be ambiguous.

Also refer to comment number 69.

DOE-RL/WHC Response No. 1: The actual 616 Building Emergency Plan is included as Appendix 7A. The emergency plan clearly identifies emergency response responsibilities. All other sample procedures have been removed from the permit application and replaced with descriptions of procedures as required by WAC 173-303-806.

Ecology Response No. 1: Appendix 7A. The contingency plan must fulfill the following:

- The procedures must clearly state who is responsible for certain tasks. Performance of necessary actions must be the responsibility of one person, not a multitude
- A clear and comprehensible chain-of-command must be delineated for this facility. In no cases should responsibility be ambiguous
- All probable unit-specific events must be considered and specific remedial activities for each must be presented, including those for imminent hazards
- It must be a stand-alone document for unit-specific events.

Ecology Requirement: Amend the contingency plan so that the above requirements are met.

DOE-RL/WHC Response No. 2: The 616 Building Emergency Plan complies with the requirements for the contingency plan. Responses to each bullet in the comment are as follows:

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85. (cont)  
Item 1 -- "The procedures must clearly state who is responsible for certain tasks. Performance of necessary actions must be the responsibility of one person not a multitude."

As indicated in the 616 Building Emergency Plan, the building emergency director has primary responsibility for directing responses after notification of an emergency situation. The requirements of waste management unit personnel identifying the emergency condition are also provided for various potential emergencies. The required actions for each individual are specified but any emergency response may require actions by several people. There is no requirement in the WAC that one person perform all necessary actions.

- Item 2 -- "A clear and comprehensible chain-of-command must be delineated for this facility. In no cases should the responsibility be ambiguous."

The 616 Building Emergency Plan clearly states that the building emergency director is responsible for implementation of emergency response actions. Site response organizations responsibilities are also identified. No cases of ambiguity are identified.

- Item 3 -- "All probable unit-specific events must be considered and specific remedial activities for each must be presented, including those for imminent hazards."

All probable unit-specific events have been identified in the 616 Building Emergency Plan and necessary responses identified. This includes all identified potential hazards.

- Item 4 -- "It must be a stand-alone document for unit specific events."

The 616 Building Emergency Plan is the emergency response document for the personnel in the 616 NRDWSF. As part of the Hanford Site, emergency response must be coordinated for all facilities onsite, which is done by Emergency Preparedness. All Westinghouse Hanford Site waste management unit specific emergency plans are prepared in compliance with WHC-CM-4-1, Emergency Plan. The Hanford Site plan identifies the actions required by response organizations. There is no requirement in WAC 173-303 that the contingency plan for each unit be a single document.

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85. (cont)  
Ecology Response No. 2: As discussed in the past three unit manager's meetings, the present contingency plan cannot be considered complete without fulfilling the requirements of WAC 173-303-350. In order to demonstrate that some of the instructions in the contingency plan are adequate for the purposes of WAC 173-303-350, it will be necessary to submit a copy of the current procedures for materials handling at this unit. This may be done under separate cover.  
DOE-RL/WHC Response No. 3: Operating procedures will be available for review at the 616 NRDWSF.

Response Location in Revision 2: Not applicable.

86. Page APP 2B-14, Section V, Procedure. The permit application states, "[a]fter the leak is contained, supervision will consult Industrial Safety and Fire Protection and Solid Waste Engineering for use of proper protective equipment..." (emphasis added).

Ecology Requirement: State what decision process will be followed for determining the proper protective equipment prior to leak containment.

DOE-RL/WHC Response No. 1: The actual 616 Building Emergency Plan is included as Appendix 7A.

The emergency plan clearly identifies emergency response actions to be taken in the event of a spill.

Ecology Response No. 1: Appendix 7A. The facility emergency response plan does not discuss protective equipment.

Ecology Requirement: This is required, amend the text accordingly.

DOE-RL/WHC Response No. 2: The 616 Building Emergency Plan does list all emergency equipment in the waste management unit. It also identifies the location and provides a physical description (Table 1) as required in WAC 173-303-350(3)(e). There is no change required.

Ecology Response No. 2: Refer to numbers 38 and 85.

DOE-RL/WHC Response No. 3: Operating procedures will be available for review at the 616 NRDWSF.

Response Location in Revision 2: Not applicable.

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87.	<p><u>Page APP 2B-27, Section VI, Numbers 3-5.</u> During a site visit (1/11/90) it was noted that the procedure for container labeling in use at the facility is not consistent with that described in the permit application nor is it in compliance with the applicable regulations.</p> <p><u>Ecology Requirement:</u> Container labeling must comply with the provisions of WAC 173-303-190 and WAC 173-303-630(3). Implement the requirements of these regulations immediately and modify the permit application accordingly.</p> <p><u>DOE-RL/WHC Response No. 1:</u> The container labeling procedure was reviewed and determined to fully comply with the requirements of WAC 173-303-190 and WAC 173-303-630(3). The text will remain unmodified.</p> <p><u>Ecology Response No. 2:</u> Appendix 2B. Container labeling is not described.</p> <p><u>Ecology Requirement:</u> Describe and illustrate how the container labeling requirements of WAC 173-303-190 and -630(3) are met.</p> <p><u>DOE-RL/WHC Response No. 2:</u> The text has been modified to clearly describe the container labeling practices.</p> <p><u>Ecology Response No. 3:</u> The labeling scheme for WP01, WP02, WP03, WT01, WT02, WC01, and WC02 will meet the labeling requirements if all dangerous wastes which fall into the persistent, toxic, and/or carcinogenic categories are labeled as such. Revise the text accordingly.</p> <p><u>DOE-RL/WHC Response No. 3:</u> The text has been so modified.</p> <p><u>Response Location in Revision 2:</u> Page 4-1, lines 35-43.</p>	12/18/90
88.	<p><u>Page APP 2B-36, Number 7.</u> The permit application requires that trenches be determined to not contain wastes before the floors are washed.</p> <p><u>Ecology Requirement:</u> State how this will be verified. See comment number 9.</p> <p><u>DOE-RL/WHC Response:</u> A description of the procedure used to cleanup released waste is included in Section 4.1.1.8. This description includes sampling of the spill site to verify cleanliness.</p> <p><u>Response Location in Revision 2:</u> Page 4-5, lines 1-49; page 4-6, lines 1-52.</p>	03/23/90

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89.	<p>Page APP 2B-37, Number 11. Waste water from mopping floors in the facility will be drained into the loading dock french drain.</p> <p><u>Ecology Requirement.</u> Modify this procedure so that there is no inadvertent release of contaminants to the french drain. See comment numbers 9 and 82. <u>DOE-RL/WHC Response:</u> A description of the process used to verify that water contained in the loading pad trenches is clean is provided in Section 2.5.1.</p> <p><u>Response Location in Revision 2:</u> Page 2-12, lines 30-52; page 2-13, lines 1-22.</p> <p>** The following comments were received from Ecology on August 29, 1990, and are considered to be a supplement to the NOD received on November 21, 1989. **</p>	03/23/90
90.	<p>Page vii. The lists of acronyms and abbreviations is not comprehensive. For example, it is not clear from these lists what is meant by 'facility.'</p> <p><u>Ecology Requirement:</u> This section must be sufficiently comprehensive to prevent ambiguities in the terms used within the permit application. This section should be expanded to include a list of definitions where, as a minimum, terms such as 'facility,' 'generator,' 'Hanford Site,' 'offsite,' 'onsite,' and 'unit,' are clearly defined. Refer to WAC 173-303-040, Definitions. <u>DOE-RL/WHC Response No. 1:</u> A definitions section has been added to Chapter 1.0.</p> <p><u>Ecology Response No. 1:</u> The definitions provided still leave ample room for ambiguity within the text of the permit application. To avoid confusion, any use of an ambiguous term must have sufficient modifiers to clearly determine what is meant. Any use of the terms "facility" or "site" will be assumed to be referring to the entire Hanford Facility. Any use of the term "unit" with no modifiers will be construed to mean the 616 NRWSF.</p> <p>A number of definitions conflict with the definitions of WAC 173-303. In general, it is not appropriate to redefine or substitute new terms for those already defined in the Dangerous Waste Regulations. Revise the definition section and text of the permit application so that terms used are in accordance with WAC 173-303-040. <u>DOE-RL/WHC Response No. 2:</u> The definition section has been revised to eliminate confusion.</p>	

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90.	<p>(cont) <u>Ecology Response No. 2:</u> USDOE/WHC proposes to include revised definitions in the next permit application submittal. In order to minimize the number of page changes that will be necessary in the next revision of the permit application, these definitions should be provided to Ecology for review and comment. <u>DOE-RL/WHC Response No. 3:</u> The definition section was provided to Ecology for review at the July 10, 1991, unit managers meeting.</p> <p><u>Response Location in Revision 2:</u> Acronyms and Abbreviations Section; Page 1-4, lines 33-50; page 1-5, lines 1-52; page 1-6, lines 1-8.</p>	
91.	<p><u>Page vii, line 46.</u> Typographical error. Kilopascal should be one word with the 'p' in small typeface. <u>DOE-RL/WHC Response:</u> The word kilo Pascal will be corrected to read kilopascal.</p> <p><u>Response Location in Revision 2:</u> Page vii, line 45.</p>	12/18/90
92.	<p><u>Page 1-4, line 31.</u> 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.</p> <p><u>Ecology Requirement:</u> 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.</p> <p>The following are changes that may be made to the permit, subject to approval by Ecology:</p> <ul style="list-style-type: none"><li>• Addition and/or deletion of dangerous waste codes for waste to be stored as a result of changing regulations</li><li>• Changes in the annual quantities of regulated waste to be handled</li><li>• Changes to the 616 NRDFS unit and/or facility and associated changes to drawings</li><li>• Revision of forms included in the permit.</li></ul>	12/18/90

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92. (cont)

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 clarify permit modification requirements.

Response Location in Revision 2: Page 1-6, lines 13-20.

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93.	<p>Page 2-2, line 19. Typographical error. The paragraph break at this line should be deleted. DOE-RL/WHC Response: The paragraph break will be deleted.</p> <p><u>Response Location in Revision 2:</u> Page 2-1, lines 49-50.</p>	12/18/90
94.	<p>Page 2-2, line 51. The text uses the term 'facility' in a context which implies that it is synonymous with the term 'NRDWSF.' According to the definition provided in WAC 173-303-040(30) the term 'facility' may be construed to mean the Hanford Site. See also the definition for "dangerous waste management unit" under WAC 173-303-040(111).</p> <p><u>Ecology Requirement:</u> Correct the ambiguities in the use of the terms describing the Hanford Facility and the individual dangerous waste management units as used throughout this permit application. It is not acceptable to attempt avoiding the requirements of WAC 173-303 by claiming to be alternately a single facility and conversely just a small TSD unit within the larger facility. See comment number 90. DOE-RL/WHC Response: The ambiguities associated with the use of the term 'facility' have been corrected.</p> <p><u>Response Location in Revision 2:</u> Throughout text.</p>	12/18/90
95.	<p>Page 2-10, line 52. Typographical error. The semicolon at the end of this line should be deleted. DOE-RL/WHC Response: The following text will be inserted after the semicolon "however, loads as large as 140 pounds per square inch have been transported..."</p> <p><u>Response Location in Revision 2:</u> Page 2-11, lines 13-14.</p>	12/18/90
96.	<p>Page 2-17, line 42. Section 2.7.2.2, Management of Contaminated Soil, Waters, or Other Materials, gives details of how contaminated materials resulting from an unplanned release would be managed. These procedures should be in the contingency plan.</p> <p><u>Ecology Requirement:</u> Ensure that this topic is covered in detail in the contingency plan. If it is already within the contingency plan, reference the appropriate section. DOE-RL/WHC Response: A reference to the contingency plan has been provided.</p> <p><u>Response Location in Revision 2:</u> Page 2-17, lines 6-10.</p>	12/18/90

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97.	<p><u>Page 2-18, line 25.</u> If Solid Waste Engineering staff is not able to designate the released material and associated debris resulting from a release, the Hazardous Materials Response Team and the Chemical Spill Response Team are called. The Hazardous Materials Response Team is also responsible for stabilizing a spill area so that additional contamination does not occur. It is not clear who has this function if the Hazardous Materials Response Team is not called as would apparently be the case if Solid Waste Engineering can designate the spilled material.</p> <p><u>Ecology Requirement:</u> Clarify the procedures to be followed in the event of an unplanned release and resolve any discrepancies or inconsistencies such as those noted previously. Reference the section(s) where this procedure(s) is in the contingency plan. DOE-RL/WHC Response No. 1: A reference to the contingency plan has been provided.</p> <p><u>Ecology Response No. 1:</u> Ecology has determined that spills of dangerous waste greater than 1 pint in volume or 1 pound in weight must be reported to Ecology immediately unless the spill occurs inside a totally enclosed permanent structure with adequate air emissions controls. Reports should be made to Ecology's Kennewick office, (509) 546-2977. Refer to the Hanford Facility Part B Permit in development for additional guidance. Neither the proposed text revision nor the contingency plan reflect this requirement. Revise the text accordingly.</p> <p>The proposed text states that procedures for cleaning up or otherwise managing a spill are located in Appendix 7A. However, the instructions in Appendix 7A do not state what clean up procedures will be followed in the event of a spill other than generic statement such as, "... actions appropriate for the waste or material involved shall be initiated to contain and control the release." Provide the procedures in the contingency plan or provide supplemental documentation providing them. See number 85. DOE-RL/WHC Response No. 2: Spill reporting requirements will be updated to reflect the applicable requirements. Operating procedures will be available for review at the 616 NRWSF.</p> <p><u>Response Location in Revision 2:</u> Page 2-16, lines 1-2.</p>	
98.	<p><u>Page 3-7, line 12.</u> The sampling and testing methods referenced in Sections 3.2.2 and 3.2.3 and references therein are not equivalent to the methods stipulated in WAC 173-303-110, Sampling and Testing Methods.</p>	12/18/90

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98. (cont)  
Ecology Requirement: Revise the permit application and operations so that the correct sampling and testing methods are utilized for waste designation pursuant to WAC 173-303-110.  
DOE-RL/WHC Response: The text has been modified so that the correct sampling and testing methods are specified for waste designation pursuant to WAC 173-303-110.  
  
Response Location in Revision 2: Page 3-7, lines 27-28.

99. Page 4-4. Control of run-on is discussed, but control of run-off is not.  
  
Ecology Requirement: Discuss the control of run-off from the facility. In particular, the case of activation of the sprinkler system should be addressed.  
DOE-RL/WHC Response No. 1: A discussion of the control of run-off has been included in the text.

Ecology Response No. 1: 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.  
DOE-RL/WHC Response No. 2: The text has been modified to describe the sampling and analysis methods to be used.

Ecology Response No. 2: USDOE/WHC proposes a text revision that states, "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." This proposed text revision is too ambiguous. Specify what "approved procedure" would be performed and what "laboratory-prepared and analyzed" entails. Any procedures must be in accordance with WAC 173-303-110.  
DOE-RL/WHC Response No. 3: The text has been revised to ensure that procedures used are in compliance with WAC 173-303-110.

Response Location in Revision 2: Page 4-6, lines 2-6.

100. Page 6-4, line 18. Annual inspection of the 616 NRDWSF ignitable and reactive storage areas by a professional familiar with the Uniform Fire Code is mentioned. No mention of recordkeeping is made.

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100. (cont)  
Ecology Requirement: Records of these inspections must be made in the inspection log or the operating record per the requirements of WAC 173-303-395(1)(d). Revise the text accordingly; state where these records will be maintained.  
DOE-RL/WHC Response: The text has been revised to include documentation of the annual inspection in the 616 NRDSWF logbook.

Response Location in Revision 2: Page 6-4, lines 16-26.

101. Page F6-1. The daily inspection data sheet seems to be conducive to cursory inspections of the facility.

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Ecology Requirement: 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.  
DOE-RL/WHC Response No. 1: The daily and weekly inspection data sheets have been modified to provide check-offs for each area of the building.

Ecology Response No. 1: 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:

- 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.
- 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.

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101. (cont)	DOE-RL/WHC Response No. 2: The checklists have been revised to correct identified deficiencies.	
	<u>Response Location in Revision 2:</u> Pages F6-1.1 through F6-2.3, Figures 6-1 and 6-2.	
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 the response to comment number 92.</p> <p><u>Response Location in Revision 2:</u> Page 1-6, lines 13-20.</p>	12/18/90
103.	<p><u>Page 11-2, line 42.</u> Typographical error. "...provide <u>a</u> approximately ..."</p> <p>DOE-RL/WHC Response: Text associated with establishing concrete background levels has been removed.</p> <p><u>Response Location in Revision 2:</u> Page 11-2, lines 20-24.</p>	12/18/90
104.	<p><u>Page 11-6, line 13.</u> The permit application states that rinsate will be stored as "detailed previously" but does not reference where in the permit application this procedure is previously detailed.</p>	12/18/90

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104. (cont)	<p><u>Ecology Requirement:</u> Reference the procedure for containerizing, designating, and storing this rinsate. All other references to "previously detailed" procedures must specify the appropriate section.</p> <p><u>DOE-RL/WHC Response:</u> The text has been modified to identify how decontamination rinsate will be handled.</p> <p><u>Response Location in Revision 2:</u> Page 11-4, lines 16-22.</p>	
105.	<p><u>Page 11-9, line 1.</u> Sampling and analysis of the pad subsoils is not currently planned.</p> <p><u>Ecology Requirement:</u> This is required, amend the closure plan accordingly.</p> <p><u>DOE-RL/WHC Response:</u> The text has been modified to incorporate the sampling and analysis of soils beneath the loading pads if it is determined that contamination has penetrated the concrete.</p> <p><u>Response Location in Revision 2:</u> Page 11-10, lines 10-39.</p>	12/18/90
106.	<p><u>Appendix 7A.</u> The Building Emergency Plan is not sufficiently detailed for evaluation, much less implementation. This may be due to the fact that a number of additional documents, as discussed at the Unit Managers Meeting of August 15, 1990, are necessary for implementation of the emergency plan.</p> <p><u>Ecology Requirement:</u> Submit all documents to Ecology that are necessary for implementation of the contingency plan.</p> <p><u>DOE-RL/WHC Response:</u> The general site emergency response plans have been provided with the Hanford Facility Permit Application. The 616 Building Emergency Plan is the specific plan for emergency response actions at the 616 NRWSF. It is sufficiently detailed for implementation and is presently in the waste management unit for use in response to an emergency.</p> <p><u>Response Location in Revision 2:</u> Not applicable.</p>	12/18/90

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107.	<p>Page 7A-3. The plan describes the types of wastes not acceptable at the 616 NRDWSF; radioactive and mixed waste are not on this list.</p> <p><u>Ecology Requirement:</u> Include radioactive waste and mixed waste on this list. <u>DOE-RL/WHC Response:</u> The comment references the third paragraph of the 616 Building Emergency Plan that is in the general description of the waste management unit and associated operations. As stated in the first paragraph of Section 1.4, the waste management unit only accepts <u>nonradioactive</u> wastes. By definition, this excludes radioactive and mixed wastes. These items do not need to be included in the referenced paragraph.</p> <p><u>Response Location in Revision 2:</u> Not applicable.</p>	12/18/90
108.	<p>Page 7A-5, Section 2.1. Under the last bullet it states that the "emergency plan consist of this plan, the WHC Emergency Plan, the DOE-RL Emergency Plan, and the DOE-RL Emergency Procedures Manual." This contingency plan must be sufficiently developed to fulfill the requirements of WAC 173-303-350. This indicates that other documents are necessary to implement this plan.</p> <p><u>Ecology Requirement:</u> All documents required for implementation of the contingency plan must be submitted to Ecology to fulfill the requirements of WAC 173-303-806(4)(a)(vii). These may be submitted in the TSD Unit's permit application or within the scope of the Hanford Facility Permit Application. See comment number 107. <u>DOE-RL/WHC Response:</u> The 616 NRDWSF is part of the Hanford Site and as such will be covered by the site emergency response organizations. The 616 Building Emergency Plan identifies the requirements for the waste management unit personnel in responding to an emergency situation.</p> <p>The emergency response organizations (as with any other waste management unit) will have their own response plans. The generic Site Part B should provide the general emergency response plan. The 616 Building Emergency Plan satisfies the requirements of WAC 173-303-806(4)(a)(vii) and WAC 173-303-350.</p> <p><u>Response Location in Revision 2:</u> Not applicable.</p>	07/8/91

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109.	<p><u>Page 7A-5.</u> The plan states that each employee must annually review this plan and document that review using the "Employee Building Emergency Plan Checklist," as defined in WHC-CM-4-1. This requirement is not a necessary part of the emergency plan, but instead clutters and, therefore, obscures the information presented.</p> <p><u>Ecology Requirement:</u> This requirement should be included as part of employee training; the documentation must be addressed in the records section.</p> <p><u>DOE-RL/WHC Response:</u> While not a requirement of WAC 173-303, the inclusion of the annual employee review and documentation via the Employee Building Emergency Plan Checklist is included in the 616 Building Emergency Plan to ensure that this review is completed. The 616 Building Emergency Plan is the actual operating document for 616 NRDWSF personnel emergency response. This requirement only adds a single paragraph to the building emergency plan and does not clutter or obscure the information presented. The requirements will remain in the 616 Building Emergency Plan, be noted in the Personnel Training Chapter, and documentation requirements noted in the Reporting and Recordkeeping Chapter. (Note that the form number will be corrected to the latest number used for this form.)</p> <p><u>Response Location in Revision 2:</u> Page T8-2, Lines 5-6; page APP 8A-5, lines 1-7; page 12-12, lines 9-19.</p>	12/18/90
110.	<p><u>Page 7A-7.</u> The bullet list does not include radioactive materials; it is also redundant with the information provided on page 7A-3 of this contingency plan.</p> <p><u>Ecology Requirement:</u> Revise the text as appropriate. Eliminate disorganization and redundancies within the text to the extent possible.</p> <p><u>DOE-RL/WHC Response:</u> The referenced list (Section 3.0) is a list of hazardous wastes that are not accepted at the 616 NRDWSF. The last sentence of the section states "Radioactive waste are not stored in the 616 Building." No text revision is appropriate. Although some information may be repeated in different sections of the plan, it has been based on a format developed for use prepared for all Hanford Site waste management unit specific emergency plans. This information is thus more easily accessed by anyone familiar with the format in responding to an actual emergency at any Hanford Site waste management unit. No revisions are deemed necessary.</p> <p><u>Response Location in Revision 2:</u> Not applicable.</p>	12/18/90

# CORRESPONDENCE DISTRIBUTION COVERSHEET

Author	Addressee	Correspondence No.
R. C. Bowman, 6-4876	T. L. Nord, Ecology	Incoming: 9105219 Ref. #9157127D 16675
Subject: 616 NONRADIOACTIVE DANGEROUS WASTE STORAGE FACILITY DANGEROUS WASTE PERMIT APPLICATION (TSD: S-6-1)		

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