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	Title: HANFORD FACILITY RCRA PERMIT HANDBOOK
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1.0 ECOLOGY WORKSHOP PRESENTATION	1-1 to 1-6	0	03/96	1-1 to 1-6	O.A	11/96
I.A.1.b.	All	0	03/96	All	O.A	11/96
I.F.	Table	0	03/96	Table	O.A	11/96
II.A.1.	All	0	03/96	All	O.A	11/96
II.E.1.	All	0	03/96	All	O.A	11/96
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Name: DA /oom	Date: 12/19/96
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PRESENTATION

1.0 ECOLOGY WORKSHOP PRESENTATION

This section addresses 14 general topics discussed during the October 1994 2-day workshop. This section is a summary of the information presented by Ecology at the October 1994 workshop.

1.1 PERMIT STEERING COMMITTEE

Workshop Synopsis (Oct. 94): An ad hoc committee, PSC, was formed to assist in implementation of the Hanford Facility RCRA Permit. The four Permittees', Ecology representatives, and the EPA's representatives (* Oct. 96) make up this ad hoc committee. When questions come up on what conditions mean, this PSC will interpret the meaning.

If resolutions can not be reached between Ecology inspectors or permit writers and Permittees, the PSC will provide an avenue to resolve these issues. The Handbook has been developed to maintain the facts and agreements reached on individual permit condition compliance. In a question and answer format, the Handbook documents compliance requirements for each Permit Condition. If problems arise with the RCRA Permit, persons should contact the PSC for possible resolution.

1.2 OVERVIEW OF PERMIT

Workshop Synopsis (Oct. 94): The workshop allowed discussion with Ecology concerning implementing the Conditions of the HF RCRA Permit. If the intent of the conditions are understood, compliance with the conditions of the HF RCRA Permit should be easier.

The HF RCRA Permit is a tool; completing 100% compliance with the HF RCRA Permit is not going to solve all the complex problems on the Hanford Facility.

The HF RCRA Permit customizes the regulations for the Hanford Facility and applies the Dangerous Waste Regulations (WAC 173-303) to the Hanford Facility.

1.3 PERMIT HISTORY

Workshop Synopsis (Oct. 94): The HF RCRA Permit is based on 4 years of negotiations with Ecology and the EPA with input from stakeholders. Because of the complexity of the Hanford Facility operations, the HF RCRA Permit was issued as two portions: the Dangerous Waste Portion and the Hazardous and

* EPA no longer participates in the PSC as Ecology is the lead agency for all TSD units identified through the TPA.

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1 Solid Waste Amendments. The Dangerous Waste Portion is administered by
2 Ecology and the HSWA by the EPA.

3
4 One part of the Dangerous Waste Portion addresses corrective action.
5 Once Ecology receives authorization for corrective action the HSWA portion
6 will be incorporated into the Dangerous Waste Portion.
7

9 1.4 PERMIT STRUCTURE

10
11 **Workshop Synopsis (Oct. 94):** The HF RCRA Permit is divided into two portions
12 with five common parts to each: I. Standard Conditions; II. General Facility
13 Conditions; III. Unit-Specific Conditions for Final Status Operations;
14 IV. Corrective Action for Past Practice; and V. Unit-Specific Conditions for
15 Units Undergoing Closure.

16
17 The introduction, not enforceable, contains information regarding dispute
18 resolutions. If there is a problem implementing a Permit Condition, the
19 dispute will use the Dangerous Waste Regulations (WAC 173-303) and, if needed
20 the Pollution Control Hearing Board, the legal entity that hears conflicts
21 between regulators and permittees.
22

24 1.5 PART I OVERVIEW

25
26 **Workshop Synopsis (Oct. 94):** Standard Conditions are in Part I, similar to
27 all dangerous waste permits in Washington State. Part I contains
28 administrative conditions.
29

31 1.6 PART II OVERVIEW

32
33 **Workshop Synopsis (Oct. 94):** Part II contains conditions that apply to
34 TSD units and the areas in between these TSD units. Ecology views these
35 conditions as the minimum requirements that need to be met on the Hanford
36 Facility. Conditions in Part II can be superseded by unit-specific conditions
37 in Part III and Part V.

38
39 The Applicability Matrix (Attachment 3) defines where Part II conditions
40 apply across the Hanford Facility.
41

42 **Question:** Did Ecology say that Parts I and II would be superseded by Parts III
43 or IV or Part V?

44 **Answer:** Parts I and II, actually primarily Part II -- I guess you could do
45 Part I -- could be superseded by Parts III and V.

46 But not necessarily. And the default is to follow exactly what
47 Parts I and II say. The Permittees will have to come up with
48 compelling, convincing arguments to the permit writer to do
49 something different. It's possible, and it already exists in some
50 of the units.
51
52

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1.7 PART III OVERVIEW

Workshop Synopsis (Oct. 94): Part III contains unit-specific conditions for operating TSD units.

1.8 PART IV OVERVIEW

Workshop Synopsis (Oct. 94): Part IV contains conditions for corrective action for past practice activities. Part IV will merge with the HSWA Part III when Ecology receives authority for HSWA.

Question: US Ecology was in the original permit. Do they have a separate permit? What's DOE's responsibility?

Answer: The land where the US Ecology site is located is leased to the state of Washington. That lease is administered by the Department of Ecology. The Department of Ecology has a problem if there's a problem at US Ecology. DOE's responsibility is as the landowner, and if both of those parties would be unresponsive to whatever regulations they should be meeting, then the federal government ultimately could end up having to eat the cost if that came to be a situation later on. But right now if anything were to happen, and US Ecology required some action, RL would turn directly to the Department of Ecology and ask them what they planned to do.

Question: Any word on Ecology's HSWA authorization?

Answer: Any day. Ultimately what was going to trigger it was the issuance of this permit.

1.9 PART V OVERVIEW

Workshop Synopsis (Oct. 94): Part V contains unit-specific conditions for TSD units under going closure.

1.10 PERMIT ENFORCEMENT APPROACH

Workshop Synopsis (Oct. 94): Ecology recognizes that the HF RCRA Permit is unique and will take a reasonable approach in implementing conditions. The Facility-wide concept is a new permitting approach and everyone anticipates about a year to fully implement conditions.

If Ecology believes the Permittees are making a sincere effort on how to apply this permit, Ecology will look at those kind of enforcement cases very reasonably because Ecology understands the complexities involved.

1.11 PRIVATIZATION

Workshop Synopsis (Oct. 94): With privatization activities, there will be additional leases to allow people to use land on the Hanford Facility.

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1 On the use licenses, the use permits, and the easements, a letter has
2 gone out to all the people who have those telling them that they have to
3 comply with the permit conditions that require reporting of releases.
4
5

6 1.12 CRITICAL SYSTEMS 7

8 **Workshop Synopsis (Oct. 94):** Ecology is writing up agreements as to what
9 critical systems are within any unit being built. The engineering change
10 notices (ECN) related to such systems would be seen and reviewed before
11 finalized and implemented. The ECNs on noncritical systems would be referred
12 to Ecology for review purposes.
13

14 For nonconformance reports (NCR), these will be submitted 5 days after
15 identification of the nonconformance. What Ecology is just trying to do is be
16 involved early on the when the contractors are building. This is a minimum
17 requirement that the Permittees have to meet. It's certainly in the
18 Permittees best interest to have Ecology involved so Ecology understands what
19 the Permittees are doing and that agreements are in place before the
20 Permittees go ahead and implement some change on the projects. Construction
21 problems can directly impact the Permittees ability to meet a TPA milestone.
22 Ecology wants to be involved early on in all construction projects. **(Oct. 96)**
23 Following this meeting, agreement has been reached among DOE-RL, Ecology, and
24 the contractors that critical systems lists will be defined at the TSD unit
25 level.
26

27 **Question:** What about the definition of critical system? Does that come into
28 play there?

29 **Answer:** Ecology has allowed units that are coming into the permit to
30 identify critical systems at that unit, and the term critical
31 systems is defined in the definition section of the permit. What
32 it's saying is, if the Permittees make changes to the critical
33 systems, then the Permittees need to let Ecology know or the
34 Permittees need to submit a modification. It was actually written
35 to handle construction projects to decide when Ecology needed to be
36 notified about design changes. That was the real purpose. However
37 now Ecology has kind of expanded it into this to say it's more than
38 just construction projects. So yes, it does come into play, and
39 that's still an option to define critical systems.

40 **Question:** This condition; critical system, says we're to provide copies 5 days
41 after, 5 working days after initiating the ECN on critical systems.

42 **Answer:** Yes. The initiation of the ECN is when the decision -- not the
43 decision, the engineering solution of the problem has been drafted
44 and sent through the review cycle, that's when the ECN has been
45 initiated.

46 **Question:** Ecology wants to see a critical system ECN before it's been
47 approved?

48 **Answer:** Yes, and not on all the systems, only the critical systems. Even if
49 it hasn't been dispositioned, by letting Ecology know within 5 days
50 after initiating it, Ecology have the opportunity to take part in
51 the discussions and come to the Permittees meetings or call and find
52 out what's going on because basically Ecology wanted it as a

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1 heads-up and Ecology understands it may not always be resolved by
2 the time you notify us.

3 Question: What the Permittees are saying is make Ecology a formal part of the
4 NCR process? Is that what you're saying?

5 Answer: Yes, the Permittees will have to in accordance with this. Ecology
6 wanted to do that, but that was viewed by a number of people as
7 going too far. That's why Ecology came up with this language. And
8 really it would be in the Permittees best interest and Ecology's
9 best interest to include the construction inspector, keep Ecology
10 informed as early on in the process as possible.

11 Question: We have a critical system list developed for C-018 and looked very
12 generic. Why can't we use that? Why can't we look at it and see if
13 it's generic enough we can use it?

14 Answer: If you sent it to us we'll look at it.

15 Question: What is the relevancy of critical systems to 616 and 305-B?

16 Answer: (Oct. 96) If any major modification of 616 or 305-B is planned, a
17 check on whether or not a critical system is being modified needs to
18 be conducted.

21 1.13 DEFINITION "AT THE FACILITY"

22
23 Workshop Synopsis (Oct. 94):

24
25 Question: Could you comment on what "at the facility" means?

26 Answer: We've talked about that to the extent about whether we consider that
27 to include Seattle or Kent, and we said no. Certainly anywhere on
28 the 560 square miles we would consider the facility. If you wanted
29 to keep them at something not on the facility, which is I think
30 where the administrative record in Richland is, we can accommodate
31 that. That wouldn't be a problem.
32 2440 Stevens is not on-site.
33 But Ecology would allow that to be the house for the records. That
34 was the last Part I condition.

37 1.14 LEGAL DESCRIPTION

38
39 Workshop Synopsis (Oct. 94):

40 Question: Clarify that the site boundary ends at the 300 Area. What are we
41 talking about for, the 700 area, the 1100 Area, the 3000 Area? All
42 these different areas where there's still waste generated under same
43 EPA number but there is now going to be a new EPA number?

44 Answer: Department of Energy has submitted a request to get new ID numbers
45 for the Federal Building and the 1100 Area. Three other places.
46 The 1100 Area is actually contiguous. The 3000 Area, the 700 Area
47 are the areas where we've asked for new ID numbers.

48 Question: When will this take effect, the different numbers?

49 Answer: Ecology can't issue those numbers. They go up to EPA. Ecology has
50 been asked whether Ecology has a problem with the new ones. Ecology
1 said no, except for the closure of the Simulated High Level Waste
2 Slurry site, which is in the 3000 area. And Ecology didn't want a

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1 new EPA number to impact that because that closure is going into the
2 next modification of the permit, which will happen in '95, so
3 Ecology just said we don't care.
4 There was a gentleman's agreement that the Permittees could handle
5 it all as if it were contiguous, but the Permittees were never able
6 to get that in writing so the Permittees finally decided we needed
7 to request additional ID numbers.
8 Question: Will there will be an interim status on each of these new areas with
9 these new numbers?
10 Answer: No, there won't be interim status.
11 Interim status only applies to TSD activities, not generating
12 activities.
13 The permit does not apply to the generator sites so they wouldn't
14 need a permit whether they had their own ID number or not.

I.A.1.b.

Permit Condition (Sept. 94): I.A.1.b. Effect of Permit - Applicability Matrix

The Conditions of this Permit shall be applied to the Facility as defined by the Permit Applicability Matrix (Attachment 3).

Responsiveness Summary: Refers to Applicability Matrix.

Workshop Synopsis (Oct. 94): Permit Steering Committee (EPA, Ecology-Lacey; Ecology-Kennewick, DOE-RL, BHI, PNL and WHC representation) will control the Applicability Matrix changes. The Applicability Matrix determines enforceability locations.

Basically what that matrix does is split the Hanford Facility into six functional areas, and each one of those areas has a different degree of permit enforceability added.

Across the top of the matrix there's categories A, B, C, D and F. At the bottom of the page, the categories are defined. Category A is leased land. Particularly the Washington Public Power Supply System and the US Ecology site. However, since issuing the permit we've already started fielding some questions about other types of permits or agreements that Energy may have with somebody else that essentially entitles them to use that land. Ecology hasn't made a decision on that, so for today I just wanted you to know that when Ecology mentioned leased lands, Ecology is thinking of WPPSS and US Ecology.

Category B is the North Slope and ALE. Maybe in the near future those two areas will be loped off the site and Ecology wanted to make it convenient to just take those out. There's stars in every one of those, but those you need to read the footnote to see they're not always applicable. They're only applicable if you start doing a treatment, storage, and disposal activity.

Category C is interim status TSD units. That's whether they are nonoperating, and need to go through closure, or whether they're operating.

Category D is areas between the TSDs, excluding any leased lands or North Slope and ALE. Category D is the interstitial area.

What we were trying to capture here is the movement of waste around the Hanford Facility, the fact that although there are discrete treatment, storage, and disposal units, and their operation has impacts across the Hanford Facility. So we're trying to capture some kind of management mechanism to alleviate any problems we have with the innerconnecteness of all those TSDs.

Category E is the TSD unit closures that are found in Part V. There are currently three in the permit. And category F is TSD operating units in Part III. There currently are two of those.

What really complicates the Applicability Matrix are the qualifiers in the far right and the footnotes at the bottom. It's very important to read those qualifiers and footnotes because although there may be a star for the area you're in, the condition may or may not be applicable depending on the circumstances.

So Fred, can you and Janet and Harold get together because Harold is going to have Simulated High-Level Waste Slurry coming up soon that we're going to have to go through this exercise, come up with a flow chart with some descriptive text and regulatory citations.

I.A.1.b.

(Oct. 96) The permit applicability matrix table has been modified and is usable. An additional flow chart and text are not needed.

Question: There was a joint announcement that the North Slope and the Arid Lands Ecology (ALE) was determined to be cleaned up. What effect does those types of announcements have coming in and looking at the contiguous portion of the properties and downsizing the site?

Answer: It was always Ecology's understanding by the end of this year, that those would no longer be a part of the Hanford Site. When that happens, they won't be contiguous Energy properties and they won't be regulated in the permit. But North Slope and ALE, but once they're no longer part of Energy's property, we'll do a permit modification and knock those out.

Question: What do you mean by boundaries, geographically around the unit?

Answer: We've talked about that issue before. And I think we've done it on a unit by unit basis. For example, I think for 616 they said the boundary was like 100 feet out from the edges of the building. No, we haven't considered that. I haven't put a lot of thought into it. I'd say starting with what's in the Part A application Form 3 is a good place to start as any.

We haven't specifically defined what land area that covers. In some cases the Part A has specific dimensions in it on the Form 3 for a given unit. In other cases it's kind of a very crude map which doesn't define very well what the boundaries of the unit itself would be.

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Compliance with the RCRA Permit will be governed by the Permit Applicability Matrix.

Permit Condition (Sept. 94): I.F. SIGNATORY REQUIREMENT

All applications, reports, or information submitted to the Department which require certification shall be signed and certified in accordance with WAC 173-303-810(12) and (13). All other reports required by this Permit and other information requested by the Department shall be signed in accordance with WAC 173-303-810(12).

Responsiveness Summary: Documents requiring certification are those which the Dangerous Waste Regulations or a Permit Condition specifically require to be certified.

Workshop Synopsis (Oct. 94): Condition I.F., Signatory Requirement. If you're submitting a document that's required to be certified, follow WAC 173-303-810(12) and (13) requirements. Any other kind of report that you submit, there's a requirement for who needs to sign those documents. At this point we've been receiving documents with Rasmussen's name on them and that's considered adequate to us.

We're looking at what level of signature needs to be on which documents. And we really have not come to a complete conclusion on how we're going to handle all those things. Regulations under RCRA require a lot more high-level signatures than some of the other environmental regs to do. Basically it has to be signed in many cases by the president of a company, the Laboratory Director in PNL's case, and the Manager of DOE-RL.

(March 3, 1995) During a teleconference submittals to be certified or not certified were identified and agreed to by Ecology-Kennewick and the Permittees. Refer to the following table.

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: All applications, reports, or information submitted to Ecology that require certification will be signed and certified in accordance with WAC 173-303-810(12) and (13). Other reports required by the RCRA Permit will be signed per WAC 173-303-810(12).

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Table 12-1. Reports and Records. (sheet 1 of 6)

HF RCRA Permit condition ¹	Records and/or Reports (Chapter 12.0 section containing description)		Hanford Facility Operating Record		Type of submittal		
			General information file ²	Unit-specific file ³	Verbal ⁴	Transmittal letter ⁵	Certified package
I.C.3.	Quarterly Notification of Class 1 Modification notification (12.1.1)	Unit		✓		✓	
		Facility	✓				
I.E.10.b. I.E.10.c. II.I.1.n.	Monitoring and records (12.1.2)	Unit		✓			
		Facility	✓				
I.E.11.	Reporting planned changes ⁷ (12.1.3)	Unit		✓	✓		
		Facility	✓				
I.E.12.i.	Certification of construction or modifications ⁷ (12.1.4)	Unit		✓			✓ ⁸
I.E.13.	Anticipated noncompliance ⁷ (12.1.5)	Unit		✓	✓	✓	
		Facility	✓				
I.E.14.	Transfer of permits ⁷ (12.1.6)	Facility	✓			✓	
I.E.15.a. I.E.15.c.	Immediate reporting (12.1.7)	Unit		✓	✓		
		Facility	✓				
I.E.15.d.	Release or noncompliance not requiring immediate reporting (12.1.8)	Unit		✓			
		Facility	✓				
I.E.16.	Written reporting (12.1.9)	Unit		✓		✓	
		Facility	✓				
I.E.17.a.	Manifest discrepancy report (12.1.10)	Unit		✓		✓	
		Facility	✓				
I.E.17.b.	Waste tracking form discrepancy report (12.1.11)	Unit		✓			

Table 12-1. Reports and Records. (sheet 2 of 6)

HF RCRA Permit condition ¹	Records and/or Reports (Chapter 12.0 section containing description)		Hanford Facility Operating Record		Type of submittal		
			General information file ²	Unit-specific file ³	Verbal ⁴	Transmittal letter ⁵	Certified package
I.E.20.	Other information (12.1.12)	Unit		✓	✓	✓	
		Facility	✓				
I.H.	Permit-related documentation: HF RCRA Permit and all attachments and modifications (12.1.13)	Facility	✓				
	Permit-related documentation: Part B permit application, closure plan, closure/postclosure plan, postclosure permit application documentation (12.1.13)	Unit		✓			
II.E.4.	Notification of Permit-related information (12.1.14)	Unit		✓		✓	
		Facility	✓				
II.I.1.a.	Waste location (12.1.15, 12.1.31)	Unit		✓			
		Facility	✓				
II.I.1.b. II.D.	Waste analysis (12.1.16)	Unit		✓			
		Facility	✓				
II.I.1.c.	Occurrence reports (12.1.17, 12.1.31)	Unit		✓			
		Facility	✓				
II.I.1.d. I.E.18.	Unmanifested waste reports (12.1.18)	Unit		✓		✓	
		Facility	✓				

Table 12-1. Reports and Records. (sheet 3 of 6)

HF RCRA Permit condition ¹	Records and/or Reports (Chapter 12.0 section containing description)	Hanford Facility Operating Record		Type of submittal		
		General information file ²	Unit-specific file ³	Verbal ⁴	Transmittal letter ⁵	Certified package
II.I.1.e. II.A. (all)	Hanford Facility Contingency Plan and incident records (12.1.19)	Unit	✓	✓	✓	✓ (II.A.1. only)
		Facility	✓			
II.I.1.f. II.C.	Personnel training records (12.1.20, 12.1.31)	Unit	✓			
		Facility	✓			
II.I.1.g. II.B.4.	Preparedness and prevention arrangements (12.1.21)	Facility	✓			
II.I.1.i. II.H.	Projections of anticipated costs for closure and postclosure and postclosure monitoring and maintenance (12.1.22, 12.1.25, and 12.1.31)	Unit				✓
		Facility	✓			
II.I.1.j.	Onsite transportation documentation (12.1.23)	Unit				
II.I.1.k.	Cross-reference of waste location to waste manifest numbers (12.1.24, 12.1.31)	Unit				
		Facility	✓			

Table 12-1. Reports and Records. (sheet 4 of 6)

HF RCRA Permit condition ¹	Records and/or Reports (Chapter 12.0 section containing description)		Hanford Facility Operating Record		Type of submittal		
			General information file ²	Unit-specific file ³	Verbal ⁴	Transmittal letter ⁵	Certified package
II.I.1.m. I.E.19. I.E.22. II.S. II.G. (HSWA Portion)	Annual reports (12.1.25) Annual Noncompliance Report Annual Dangerous Waste Report Annual Hanford Site Environmental Permitting Status Report Annual Land Disposal Restrictions Report	Facility	✓			✓	✓
II.F.2.a. II:F.2.c.	Groundwater monitoring records (12.1.26, 12.1.31)	Unit Facility		✓		✓	
II.I.1.p.	Groundwater corrective action (12.1.27)	Facility	✓				
II.I.1.q.	Permit condition compliance evaluation system (12.1.28, 12.1.31)	Unit Facility		✓			
II.I.1.r.	Deed notification (reference only) ⁷ (12.1.29)	Unit		✓			✓
II.I.1.s. II.O.	Inspection records (12.1.30)	Unit Facility		✓		✓	
II.I.2.	Description of systems/reports (12.1.31)	Facility	✓				
II.J.1.	Closure certification ⁷ (12.1.32)	Unit		✓			✓

Table 12-1. Reports and Records. (sheet 5 of 6)

HF RCRA Permit condition ¹	Records and/or Reports (Chapter 12.0 section containing description)	Hanford Facility Operating Record		Type of submittal		
		General information file ²	Unit-specific file ³	Verbal ⁴	Transmittal letter ⁵	Certified package
II.J.3.	Notification of, or request for, a permit modification ⁷ (12.1.33)	Unit	✓		✓	✓ ⁶
		Facility	✓			
II.K.6.	Closure plan deviation ⁷ (12.1.34)	Unit	✓			
II.I.1.t. II.L.2.b. II.L.2.c.	Engineering change notices and nonconformance reports (12.1.35)	Unit	✓			✓ ⁸
II.L.2.d.	As-built drawings ⁷ (12.1.36)	Unit	✓			
II.N.2. II.N.3.	Receipt of wastes generated offsite ⁷ (12.1.37)	Unit	✓		✓	
II.R.	Equivalent materials ⁷ (12.1.38)	Unit	✓			
II.S. II.G (HSPA Portion)	Land disposal restrictions records (12.1.39)	Unit	✓		✓	
II.U.	Mapping methodology report and underground pipeline maps (12.1.40)	Facility	✓		✓	
II.W.1.	Other permit compliance documentation ⁷ (12.1.41)	Unit	✓			
		Facility	✓			

Table 12-1. Reports and Records. (sheet 6 of 6)

HF RCRA Permit condition ¹	Records and/or Reports (Chapter 12.0 section containing description)		Hanford Facility Operating Record		Type of submittal		
			General information file ²	Unit-specific file ³	Verbal ⁴	Transmittal letter ⁵	Certified package
II.X.1.	Schedule extensions ⁷ (12.1.42)	Unit		✓		✓	
		Facility	✓				
II.F (HSPA Portion)	Waste minimization/pollution prevention (12.1.43)	Unit		✓			

¹ HF RCRA Permit (DW Portion) Condition, unless otherwise noted.

² Hanford Facility Operating Record, General Information file.

³ Hanford Facility Operating Record, Unit-Specific file.

⁴ Verbal reporting in accordance with timeframes noted in the specified conditions.

⁵ Not certified; submittal by transmittal letter.

⁶ Certified by Permittees in accordance with WAC 173-303-810(12).

⁷ Miscellaneous support records and reports.

⁸ Certified by a registered professional engineer [e.g., in accordance with WAC 173-303-810(14)(a)(i) (refer to Chapter 4.0, Section 4.13.4)].

⁹ Certified by a registered professional engineer [e.g., in accordance with WAC 173-303-610(6) or WAC 173-303-610(11)].

II.A.1.

Permit Condition (Sept. 94): **II.A. FACILITY CONTINGENCY PLAN**
II.A.1. Implementation of the Hanford Facility Contingency Plan

The Permittees shall immediately carry out the provisions of the Contingency Plan as provided in Attachment 4, pursuant to WAC 173-303-360(2), whenever there is a release of dangerous waste or dangerous waste constituents, or other emergency circumstance, either of which threatens human health or the environment.

Responsiveness Summary:

Workshop Synopsis (Oct. 94): Condition II.A. is the Facility Contingency Plan. The permit specifies that the Permittees will use the Facility Contingency Plan. It does apply across the site in the interstitial areas. If you're at a unit, the contingency plan applies during any emergency or release. We didn't want to cover all emergencies on the Hanford Facility; for instance, if there's a cafeteria that started to burn, Ecology didn't care about that, but we were concerned about the release of hazardous substances that threatened human health and the environment.

Now the fact that a Facility Contingency Plan exists doesn't mean you don't have to have one for the unit, and I'd say in most cases the Facility Contingency Plan will be insufficient, an insufficient stand-alone document to meet the requirements to have a unit plan. And the way we envision this working is there's a Facility Contingency Plan that you can reference and maybe get 50 percent or 75 percent of your contingency requirements completed, but you're probably going to need a unit-specific plan that has some particulars for the unit that you're in.

Most units would have a copy of the Facility-wide Contingency Plan on the shelf, and then a unit-specific one which maybe does a lot of referencing to the facility-wide.

Question: If there is a building-specific emergency plan such as a building emergency plan or other similar document, if it contains the requisite information in terms of emergency response and other contingency plan requirements, will it be allowed to supersede this contingency plan for the area that it covers? For instance, for one of the buildings in the laboratory, will the building emergency plan, if it contains the requisite information, supersede the Hanford contingency plan or will there be two plans simultaneously in effect?

Answer: The Facility Contingency Plan was put together so you wouldn't have to have another plan at each unit.

The answer to that was that the Facility Contingency Plan and the building-specific plan. When basically put both generic and detailed information together to give them the complete story, and that's what a facility used for their contingency plan.

Question: Can we just use the building plan in lieu of the facility plan and just not have the facility plan there; if the building emergency plan has all the same information, requires the same actions, that the facility contingency plan would do.

Answer: That would be a problem. We don't have to look specifically. Maybe this is a thing for the Steering Committee to clarify.

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It says you need to carry out the provisions of the contingency plan. If the provisions of the contingency plan are equally spelled out in an emergency document, and that you did carry out the provisions; then that would meet the requirements.

When compliance inspectors request to see the contingency plan, we encourage the Permittee to bring forth two documents the Hanford Facility Contingency Plan and the appropriate building emergency plan.

Question: From a DOE perspective we have a problem, and that means that every single building emergency plan is going to have to contain everything that's already in the Hanford contingency piece of the overall document. And the DOE emergency plan structure, was to have a tiered series of documents. There was an overall facility-wide plan, there was then a contractor plan, and then there was a building emergency plan and each one dealt with a different level of detail. Am I hearing that PNL is proposing to do something different, Harold? Or what?

Answer: When we were discussing the implementation of this particular condition, we're trying to deal with having two documents on the shelf that perform part of the same function.

In the places where there isn't a building emergency plan, then the Facility Contingency Plan is going to rule. I mean, that's the way we drew it up. But in the cases where there is a building-specific emergency plan, we're going to be pulling two documents off the shelf in an emergency situation.

Question: Would those documents that you're talking about have all the agreements with the outside agencies and everything incorporated into the them?

Answer: A lot of that stuff could be incorporated by the reference.

If you're a TSD unit you need to have the Facility Contingency Plan there. If you're at a 90-day storage area, or if you're the generating unit, you're not subject to the permit except that you need to implement the contingency plan if you have a spill that threatens human health and the environment, or release. We're not requiring that through the permit; We're not saying that every person walking around has to carry a Facility Contingency Plan. We're not saying that at every 90-day or satellite accumulation area or generator location, that contingency plans have to be there posted on the side of the road or anything like that. With regard to enforcement, we're not going to go out there looking for the contingency plans all over. If you're at a satellite accumulation or a 90-day accumulation area and you have a release and human health or the environment were threatened, we're going to look to this condition and say you were supposed to carry out the provisions of the contingency plan. If you took all the appropriate actions, whether you looked at a green book or yellow book, Ecology isn't going to really care as long as you took the appropriate actions. The inspector will ask to see a copy of the contingency plan, and if you're not able to produce one then that in and of itself is a TSD unit regulatory violation.

(Oct. 96) Refer to Chapter 7.0 and Appendix 7A of the General Information Portion (DOE/RL-91-28) for further details on the relationship of contingency plans, building emergency plans, and permit applications.

II.A.1.

Inspection Guidance:

Permittee (ID) Guidance: PSC Meeting Minutes (06/01/95).

Requirement Summary: Immediately implement the contingency plan whenever there is a release or incident that threatens human health or the environment.

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II.E.1.

Permit Condition (Sept. 94): II.E. QUALITY ASSURANCE/QUALITY CONTROL
II.E.1. QA/QC - WAPs and SAPs

All WAPs and SAPs required by this Permit shall include a quality assurance/quality control (QA/QC) plan or equivalent to document all monitoring procedures so as to ensure that all information, data, and resulting decisions are technically sound, statistically valid, and properly documented. Each QA/QC plan shall include, or contain a reference to another document which will be used and includes, the elements defined in Conditions II.E.2. and II.E.3. The QA/QC plan may be part of a SAP, WAP, or equivalent.

Responsiveness Summary: This Condition is not applicable to interim status units at the Facility. It only applies to QA/QC activities under the permit. Furthermore, the language chosen allows for the use of equivalent documents.

Workshop Synopsis (Oct. 94): Condition II.E., Quality Assurance and Quality Control (QA/QC). This condition requires that if you have a WAP or you have a SAP you need to have a QA/QC plan or equivalent. The condition also allows you to reference other documents. Sometimes your reference may be a lab manual, something the lab does as part of your QA/QC, maybe there's a health and safety plan, anything else. I understand there's situations where there are some central documents that are used in developing a QA/QC plan or used in lieu of a QA/QC plan, and the permit says that's okay. There's, again very prescriptive requirements for what should be in a QA/QC plan.

The condition also goes on to say that as data becomes available, you need to notify Ecology and say yes, here's the data and what triggers that is the receipt of the data in completion of QA/QC. And finally the last condition in II.E. discusses the use of the data quality objective process, the DQO process, and basically says if you go through the DQO process and receive Ecology approval, that's what we can use; in essence in lieu of anything else in that condition.

One of the things that happened in the past was that plans from the labs were not obtained and made part of the records. You want to have some kind of documentation that you've at least checked at the lab to make sure they have that kind of a plan in place and it's implemented. The best thing is to actually have a copy. But you can't be incorporating their entire plan, because every time they want to make a change, then you have to make a change. That's not the reasonable thing to do.

Ecology doesn't have an answer for you. I'm going to tell you what I tell everybody else, I accept that at face value and I've never looked at QA/QC myself. I'm not familiar with QA/QC plans. I've written it down as something we need to look at and try to address that concern.

Question: Do you want the lab's QA/QC plan incorporated into the SAP?

Answer: No, it doesn't have to be. The point we're trying to make here, if you have a SAP you need to have a QA/QC plan. Maybe what you do for your QA/QC plan you have a one-page document that says my QA/QC plan exists, it's made up of the lab QA/QC, the sampling team's QA/QC. Does that make sense? That's an example. I'm not saying the lab QA/QC part is necessarily going to have to be part of a SAP or WAP.

It would have to be part of the QA/QC plan, the lab plan.
Quite frequently you'll get the labs, hire them after you've

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already got your QA/QC plan done. You don't specify the requirements for the lab plan, but you'll have the lab plan in there.

Question: I'm not sure, have you looked at all the individual requirements in this condition for QA/QC? There's pages of it, and I don't recall offhand whether they talk about it being a necessity to have all the lab QA/QC information.

Answer: I don't think it does. I think what it basically lays out is what the lab QA/QC plan is going to have to cover. I think it said you have to have a QA/QC plan and it covers all these items. I had the impression the lab plan had to be in there as well.

If does need to be in there, I think what the condition says is that you can just reference that document, you don't have to physically have it there. If that is a requirement you can just reference that document.

We're probably going to have to make a change, have that QA/QC plan done before you even decide what lab you use. Then you may change labs in the middle of the stream.

And you're saying the second lab may not be able to meet the requirements.

They may use a different QA/QC plan. One of the reasons why you might change laboratories is the first one wasn't doing an adequate job with QA/QC, in which case you probably want to have a different plan for them.

One of the ways that can be addressed is that you can state that not only are you going to use labs that can provide that type of documentation to you, that can provide a lab QA/QC plan, but you can say you're going to use surveillance or assessment type activities to make sure they have it. You can talk about it without actually referencing a particular lab. You can say what your expectations are for the lab that you're going to use and carry through and actually make sure that those things exist without having to revise.

In your laboratory procurement package you can basically specify what the QA/QC requirements are that have to be met, and if the lab can't meet those, then you don't hire them. That's normally the way you do it. I don't see a need to have the specific lab plan in with the QA/QC plan, which I think insinuates you have to.

Question: Has RL talked with Ecology about the QA/QC approach of the future? What I'm thinking about is the new Hanford Analytical Services Quality Assurance Program Plan (HAS QAPP) document and the efforts associated with HAS QAPP.

Answer: HAS QAPP was not part of the permit discussion. That document has been transmitted to Ecology, and if I remember right the transmittal letter basically said this is what we're doing, let us know if you have any problems with it. We haven't heard anything back yet. We haven't really sat down and talked with Ecology about how we're doing QA through the HAS QAPP

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Because writing some of these things maybe impacted, maybe DOE-RL wants to come forward. By making a recommendation, and addressing this permit condition.

One of the things that the Permittees all need to understand is that when we were talking these permit conditions with Ecology, the fact that we didn't contest this particular element of the permit, was based on a premise that we were going to go back and revisit this when we got to actually evaluating the WAPs for 616 and 305-B that had been incorporated. And we may very well go back and change this part of the permit. I think that that's still something that's potentially doable as part of a permitted facility, to look at this whole thing and make sure that it makes sense. We didn't have the HAS QAPP document. That just was finalized, actually it was finalized and immediately reopened for comments again. But that was just finalized what, a month and a half ago? So it wasn't part of the discussions that we had on this. Now that we have that, we would have a better argument for getting some of these conditions changed.

And the way Ecology came up with this one, this is one where, originally I believe, Energy submitted a facility wide QA/QC plan. If you go back to our first draft, we just made a hundred changes to that plan. And then we ended up coming to agreement there doesn't need to be a facility wide QA/QC plan; we just need to have requirements in the permit.

So what we did is lift these requirements out of EPA's permit. I can't tell you where EPA got this. My guess is they have some kind of guidance document and came up with all this language, and that's the source of these requirements. And that's why I'm not really familiar intimately with what they're asking for, as the gentleman is asking do we really need to have the lab QA/QC manual in here or not. That's why I can't answer that. But that's kind of a history where this condition came from.

(Oct. 96) Currently, the necessary QA/QC for a TSD unit will be identified either in an operating TSD unit WAP or in a SAP for a TSD unit undergoing closure.

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: WAPs and SAPs will contain a QA/QC plan or equivalent so that all monitoring procedures and data are documented and are technically defensible.

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II.H.

Permit Condition (Sept. 94): II.H. RECORDKEEPING AND REPORTING

In addition to the recordkeeping and reporting requirements specified elsewhere in this Permit, the Permittees shall comply with the following:

Responsiveness Summary: The Department has previously stated that the federal government is exempt from the financial assurance and liability provisions of WAC 173-303-620. As the Commenter points out, the Department also has previously stated that the requirements of WAC 173-303-620 do apply to federal government contractors. After further consideration of this issue, the Department has concluded that the requirements of WAC 173-303-620 were not intended to apply to contractors to a state or federal government in situations such as that at Hanford. (See the Department's letter to the Permittees dated June 30, 1994).

Workshop Synopsis (Oct. 94): Let's take an action for WHC, DOE-RL, and BHI to get together with Ecology and find out what Ecology's expectations are for each and every one of those units. DOE-RL will be our lead. Let's find out what those records need to be and understand where they will be kept.

In the RCRA Permit Handbook it's broken down condition by condition, and where we reach an agreement on a condition, we slide a piece of paper in there saying this is what we decided and this is a case we could use this, this is the interpretation for operating the record for the closures that are already in the permit. But I don't want to go through a permit modification to establish a list.

We want to avoid permit modification. Once you get a unit in there we want to try to work with you. That's why we added Condition II.K. that says if you're making minor changes out at the unit that you're closing and it doesn't affect the overall closure strategy then just document that in your operating record and carry on. Now if you're going to change from a clean closure to a landfill closure then you'll yeah, you'll probably have to do a permit modification.

The Permittees should write a letter telling Ecology exactly where those records are kept. If we've got something that's a tube on a post with the document we should tell them exactly where the location is.

(Oct. 96) The unit-specific recordkeeping requirements have been identified in Chapter 12.0, Table 12-1, of the General Information Portion (DOE/RL-91-28).

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: The Permittees shall follow the recordkeeping and reporting requirements of Permit Condition II.H.

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II.L.1.

**Permit Condition (Sept. 94): II.L. DESIGN AND OPERATION OF THE FACILITY
II.L.1. Proper Design and Construction**

The Permittees shall design, construct, maintain, and operate the Facility to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous substances to air, soil, ground water, or surface water which could threaten human health or the environment.

Responsiveness Summary:

Workshop Synopsis: If you are constructing a facility or unit subject to the permit you need to use the engineering change notice, the ECN process, and the nonconformance report (NCR) system that's been established for construction projects. And that basically allows us, we've approved the design, your contractor out there needs to make changes, he can do that, but we need to be plugged into the ECN and NCR process.

Question: Wondering about what status we should send these NCRs to you. Recognized before there's been any resolution made, decide on a resolution then send them to you.

Answer: We have an inspection engineer on site. I guess he's the focal point of these reports.

Question: The question is at what point in an ECN or NCR process does Ecology need to be provided that data, and that's another written comment that's been presented to us already. What we found in the construction projects out there, like Moses mentioned, we do have an onsite construction engineer that typically, although it's not spelled out in the permit, works closely with the contractors and gets involved in the weekly meetings and ends up seeing copies of these ECNs and NCRs in more than enough time to make decisions and affect the outcome of them if we need to. But I agree that's not really spelled out very well in here about officially when we need to get copy.

Answer: We (Ecology) are writing up agreements between the facility management and our construction inspection engineers as to what are the critical systems within any facility that's being built on which the ECNs related to such systems would be seen and reviewed before they are finalized and implemented. The rest of the ECNs would be referred to us just for review purposes. And this is happening on most of the construction sites onsite.

Question: This condition says we're to provide copies 5 days after, 5 working days after initiating the ECN on critical systems.

Answer: Yes. The initiation of the ECN is when the decision -- not the decision, the engineering solution of the problem has been drafted and sent through the review cycle, that's when the ECN has been initiated.

Question: You want to see it (ECN) before it's been approved?

Answer: Yes, and not on all the systems, only the critical systems. Even if it hasn't been dispositioned, by letting us know within 5 days after initiating, then we have the opportunity to take part in the discussions and come to your meetings or call and find out what's going on because basically we wanted it as a heads-up and we understand it may not always be resolved by the time you notify us.

The permit suggests that you're going to use the NCRs to determine whether the permit modification is necessary. Without the disposition, I mean, if you don't know what we intend to do about this NCR how are we going to base your decision whether we need to modify the permit?

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The NCR may be different than the ECN.

The NCRs, we are not requesting to see them before they are approved. Talking about the ECNs to be seen before they are approved.

On the NCRs, it's 5 days after identification of the nonconformance. Won't be resolved that fast.

Right. So what could happen, you tell us instead of a 6-inch wall, ended up being a 4-inch wall but you haven't decided whether or not you're going to add the 2-inches or not, so how can we say whether or not it's okay or not.

Yeah, within 2 days.

That's when you (Permittees) want to get us (Ecology) involved so we say look, you got to have a 6-inch wall, tear out the 4-inch and put in the 6-inch. What we're just trying to do here is get involved early on the when the contractors are out there building the thing. We spent a lot of time trying to figure out this 5 days, 2 days, what's issuance, spent a lot of time working on that. But really the bottom line is we want to be involved. We have guys out there and we don't want you to make mistakes that we find unacceptable, and the way to do that is keep our construction inspector involved. This is a minimum requirement that you have to meet, but I think if a contractor is wise out there he's going to spend a lot of time with our compliance inspector and it won't be 5 days, it will be the next day, it will be the next time he sees our compliance inspector and pulls him into the inspection.

By the time an ECN or NCR is issued for resolution you've got yours. So you'll have something to make your judgment on.

That's right.

On an NCR if you're going to change the design it has to go back to the design engineer for disposition approval.

Usually it's the design engineer that's been involved so whatever the solution to your noncompliance

He may be in Seattle. I mean, if it's an offsite AE, he may not get to it within 5 days to approve it.

So by then the NCR wouldn't have been initiated.

Yes, it would.

Well, the solution to the NCR wouldn't have been initiated and that's what we're after, is the resolution of the problem that we have.

In other words, your inspector is going to be working them all the time. In reality this says we don't have to send it to you until after 5 days there's been a resolution.

By the time you issue your noncompliance reports, I mean, that's not when you first identify the problem.

Yes, it is.

That's after you, you've identified the problem and this is how we propose to fix it. That's when you issue the NCR.

When you've identified a problem and it's official nonconformance, doesn't have a resolution yet that's been identified and that's what they want within 5 days.

I think it's in our best interest to get Ecology on board early, because if we do a nonconformance report and decide we're going to accept whatever the nonconformance is and 3 weeks later we find out Ecology doesn't think that's satisfactory, Ecology can force us to go back and tear the whole damn thing out. If there were a system that was built Ecology didn't feel was going to meet the regulatory requirements, Ecology could force us to tear it apart and start over. It is in our interest to have Ecology in early and make sure that situation never comes up. And how we handle the paperwork, I think, if it takes 5 days or if we can do it in 2 days or whatever, if it takes longer than that, if we're working with them then we can get their agreement that it will take longer than that.

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Yeah, I think our projects probably going to have to make some adjustments to their system of doing things to accommodate some of the permit requirements.

I almost feel like we ought to go through our NCR process to meet this requirement, need to work with Ecology to make sure the working solution, I don't think what's in the permit right now will be a working solution.

That may very well be.

I think that's one thing we contemplated, and I think what you're saying is make Ecology a formal part of the NCR process? Is that what you're saying?

Yeah, we'll have to in accordance with this.

We wanted to do that, but that was viewed by a number of people as kind of getting in your shorts too far and that's why we came up with this language. And really I want to emphasize it would be in your best interest and our best interest to include the construction inspector, keep Ecology informed as early on in the process as we can.

We can't let Ecology get into the project management role, and I seriously question whether they really want to be in that role, because then they incur some liability that comes along with that would perhaps get in the way of them taking some action they might want to take later on. But it's certainly in our best interest to get them involved and let them know what's going on, make sure they understand what we're doing and that they have a basic agreement with it before we go ahead and implement some change in the projects.

Yeah. Depends on the decision whether we send an NCR or not, rework or going back to what was originally, I don't see a reason for them to even know about it.

If you do what?

If you're just redoing something.

If you decide to tear it out and replace it?

Yeah.

Yeah, well, then it won't be a nonconformance. We're more concerned about the ones that you're not going to fix, that you're going to get the engineers to sign off and say it's acceptable as is.

There's another element and that is nearly every construction project that is being built now or in the future is going to have some TPA milestone attached to it, and a lot of times these construction problems can directly impact our ability to meet a TPA milestones. So that's another reason for keeping Ecology in the loop as much as we can without really letting them get into the project management end much things, because when it comes down to the point where we can't meet a TPA milestone, if they already know about it, if they already know what the issues are, they know the reasons, they know what we've done to try and respond to those reasons, it's a whole lot friendlier than it is when we get against a milestone that they don't know we're going to miss and all of a sudden we raise the red flag and we say sorry guys, we blew this one. It's just not really pleasant at all when we haven't kept them informed and then find ourselves in the position of maybe missing a milestone. And if anybody would like, you can probably take my place in some of the meetings we're going to have over the next few weeks on C-018. It's just not going to be pleasant.

We agreed we need to get together in this working group to get something that's feasible. I don't think what's in here is feasible.

That could be, and we need to work through that to make sure it is and if necessary modify the permit condition.

We've been doing exactly what's in the permit now for about a year before the implementation of the permit and it's been working out smoothly.

This I think came a lot from the Grout project. That's where we started identifying the interest and the need to be involved in these kind of decisions and that's kind of the history of this. And this one has been

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changed a number of times. I think it got down to a couple of our in-house engineers sat down with Kaiser and mow add at the time and worked out and said yeah, this is kind of what we do.

But if you have alternate language that you think would work better then I suggest you submit it and get it up to us and I'd be glad to look at it. If there's any place we can make the permit more clear I'm game to look at it. I just wanted to let you know the spirit of what was intended here and that was keep Ecology involved.

Just for clarification, could you say where this Condition II.L. applies right now so we're not misleading people.

It would be construction projects subject to the permit, which is no interim status, which wouldn't be interstitial area. And we're looking at building new TSDs, and if you were closing a TSD as a landfill and were putting in an engineered cover on it that would apply there as well.

None of the units that are in the permit right now have anything that this is affecting.

Can DOE-RL still expand under interim status?

That's a question we're looking at right now. Ecology has an internal meeting on Friday. In my opinion I don't think so.

We talked with Steve Alexander, Dave Lundstrom, Dave Nylander and Julie Atwood yesterday about that, expressed our concern over some of the things we've been hearing and I think it's -- you guys are going to have an internal meeting on Friday. I got the impression anyway that this is going to be a subject that will tap some further discussion before there's a decision made that Dru and perhaps even some other people will need to play in this before the actual decision is reached.

I know it's an issue with the storage of sodium metal out at the 400 area. I think it's also an issue at 340.

It's also an issue with PUREX and B Plant and Z Plant and T Plant.

Anyway, if you have words that work better and do this same thing and keeps Ecology involved early I'd be happy to look at it.

What role does the unit manager have?

I think what it says in here is to get this information to an Ecology representative.

The engineer immediately informs the unit manager of the ECN or NCR, but it is the engineer's call on the approval of the ECN.

I might be wrong. I thought we used to have language in here where in these cases we specifically designated our construction inspector as delegating, having the authority to make a decision on these. So it would really be up to the unit manager to work out with the construction inspector and they should be working closer together anyway, just like a permit writer and a compliance inspector would be. But most unit managers would defer to the construction inspector. We've had cases where that doesn't happen.

As-built drawings are required within 12 months after completing construction.

(Oct. 96) The Hanford Facility can expand under interim status on approval by Ecology, refer to Chapter 2.0, Section 2.1.1.3.1 of the General Information Portion (DOE/RL-91-28).

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Design, construct, maintain, and operate the Hanford Facility to minimize the possibility of incidents or releases that could threaten human health or the environment.

II.O.1.

Permit Condition (Sept. 94): II.O. GENERAL INSPECTION REQUIREMENTS
II.O.1. Sitewide Inspection Locations

The Permittees shall inspect the Facility to prevent malfunctions and deterioration, operator errors, and discharges which may cause or lead to the release of dangerous waste constituents to the environment, or a threat to human health. Inspections must be conducted in accordance with the provisions of WAC 173-303-320(2). In addition to the TSD unit inspections specified in Parts III or V, the following inspections will also be conducted.

Responsiveness Summary:

Workshop Synopsis (Oct. 94): Condition II.O. is the facility inspection requirements, and here's where we came to the agreement that a couple of times a year, there would be walk-through inspections of the major process areas, there would be a couple of inspections a year of the Columbia River, so those are in the interstitial area.

Condition II.O. is general inspection. This is in addition to whatever inspections you're required to do at a unit. Most units I think have weekly inspections. In some cases there's certain things you have to inspect daily. Those will still need to be done. This requirement addresses more inspection of the whole facility of that interstitial area and areas of concern. It establishes annual inspections for the process areas which are defined in the condition as 100 Area, 200 East, 200 West, 300, 400 and 1100 areas. There's some criteria there for what needs to be looked at.

Question: I know we have received written comments about what we consider adequate and I think that's a fair question. I think we need to spend some time talking about do you have to look in every cupboard and every closet and every building in the 200 Area or is it a matter of driving a car in and around the buildings. So that's subject to some interpretation, but we basically want people to go out and look and see if you can find a problem. Maybe somebody who isn't aware of the dangerous waste regulations did something inappropriate.

Answer: What do we think, clarification whether we're going to look in every cupboard or whether we're just going to do a ride down the road. I guess that's something the steering committee or Kennewick office is going to have to come up with a decision on. I can't say when. We can put it as an agenda item on our next meeting and talk about it. What's required is you notify Ecology seven days in advance, and I'm sure that a Kennewick staff person will go along on these and I would say go out and do the first one with the Ecology employee and see what they think about it and go from there.

Question: What's the intent of this (II.O.1)? Are we supposed to be going in buildings and looking inside the boiler and looking at all their processes and all their monitoring equipment? You got a couple descriptions here. One place it tells you to look in WAC 173-303320 (2), tells you to look at the monitoring devices and records and then you get down into II.O.1.C. and it lays out some specific items that we should look for, orphan drums and things that are fully going to affect the environment, human health. We got from one extreme to another what these things are. What was the second extreme, one was II.O.1.C. and the other extreme was what?

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Answer: If you look at II.O.1., tells you inspection will be done on conditions of WAC 173-303-302 (2) which lays out some specific items you're supposed to look at, supposed to look at monitoring equipment, security. This is all the stuff that you go in and look at, go inspect a permitted TSD unit. Is that the intent of this?
That wasn't how we envisioned it being done.
I think II.O.2., and it's not clear, it says inspect the facility, but I think II.O.2. was what needed to be done at the units and that's what, and then the last sentence of II.O.1. says in addition to the TSD units do the following. I can't disagree with you that we need to clarify this. I don't have the answer right now. We'll put it on our agenda to work on but right now because we don't have the definitive answer and we can't really ding you for how you do it. And like I said maybe the best way to do it is plan one to what you think is adequate and give Ecology the seven-day notice and let them come along and they'll go along and say yeah, I think that was pretty good or maybe we should look here or there or whatever. The problem doing it that way we're talking looking a whole year into this inspection plan we're getting what we're going to do. If we go off and do the first one we're not doing it the way you want it.

Like I said we can take an action item and we can put that on our agenda and we can talk about that. We all recognize it needs more definition.

The fact of the matter is before we go off and do one of these inspections we are going to need a plan for how we're going to conduct it, and that development of that plan we'll be talking to Moses and we'll be talking to the other people in Ecology about what their expectations are and what our abilities are in terms of how much manpower and effort we can throw into it. And the arguments that went back and forth over this particular issue ranged widely all the way from one point at which I sort of lost my temper and accused Ecology of wanting to take 15,000 people arm in arm and walk the whole confounded site.

We will have to put together an inspection plan for how we're going to do it and I don't see any reason why we can't get some input from Ecology before we ever set foot on the ground so to speak.

We're willing to work with you on this one. I've never looked at such a big area say like what would I do with 200 East. I've done it with buildings where I've walked around the building, walked around every room, opened lids off containers. But to do that in 200 East or 200 West would take you a long time.

Inspection Guidance:

Permittee (ID) Guidance:

(Oct. 96) General facility inspections guidance is provided in the Hanford Facility RCRA Permit General Inspection Plan, WHC-EP-0850.

Requirement Summary: Conduct general Hanford Facility inspections according to WAC 173-303-320(2) to prevent incidents that may cause releases that threaten human health or the environment.