

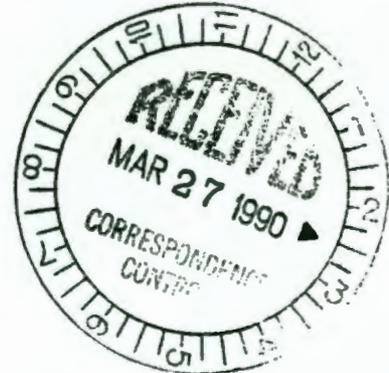
# START



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

Mail Stop PV-11 • Olympia, Washington 98504-8711 • (206) 459-6000

March 16, 1990



Mr. Steven H. Wisness  
Hanford Project Manager  
U.S. Department of Energy  
P.O. Box 550  
Richland, Washington 99352

Re: Notice of Deficiency: Grout Treatment Facility Dangerous Waste Permit Application

Dear Mr. Wisness:

Please note that we have received and are continuing to review your Grout Treatment Facility Dangerous Waste Permit Application (Revision 1) dated January 1990. Our review to date has resulted in concurrence with 134 of the 175 responses provided in your February 26, 1990 NOD Response Table. A list of the responses with which Ecology concurs is found in enclosure 1. Enclosure 2 of this letter contains further discussions on the remaining 41 original responses and also includes 78 additional comments.

Our review evaluated the application's compliance with Washington State Dangerous Waste Regulations (WAC 173-303) including referenced portions of the federal RCRA program. Where applicable, specific regulatory cites are noted after individual comments. Our review also assessed compliance with the requirements of the Hanford Federal Facility Agreement and Consent Order. All comments are referenced to corresponding pages within the revised application. In order to avoid confusion between multiple NOD's, we have retained the comment numbers from the original NOD and added new comments onto this list. Therefore, the first new comment begins with number 176.

This NOD should be addressed and a response forwarded to our office by May 31, 1990. Your response should consist of a revised NOD response table. Any request for extension of this deadline must be made in writing and should be accompanied by pertinent documentation.

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This list of comments should not be viewed as exhaustive or final. A detailed review of the closure plan and structural analysis is still being conducted. Some of this review has been contracted to our consultants. We expect to provide additional comments in these areas by May 17, 1990.

Technical inquiries regarding this NOD should be directed to Ecology's Grout Unit Manager, Mr. Joe Witczak at (206) 438-7557.

Sincerely,



Roger Stanley  
Program Manager  
Nuclear and Mixed Waste Management

RS:JJW  
Enclosures

cc: Paul Day  
Dan Duncan  
[REDACTED]  
Carol Geier  
Administrative record

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ENCLOSURE 1

The Washington State Department of Ecology concurs with the following responses to our July 1, 1989 NOD for the Grout Treatment Facility. Concurrence is based on the responses as they appear in the GTF NOD Response Table dated February 26, 1990.

1,3-5,7,12-16,19-24,30-34,37,39-45,47-52,55,57,58,61-67,72-75,77-120,  
124,125,127,129-131,133,135-141,144-161,163,167-172,174,175.

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ENCLOSURE 2

NOD Comments for the Grout Treatment Facility

- | <u>No.</u> | <u>Page</u> | <u>Comment</u>   |
|------------|-------------|--|
| 2.         | 1-1         | Line 36: Although the Dry Materials Facility (DMF) does not treat, store, or dispose of dangerous waste, it is an integral aspect of the grout treatment process. The DMF requires critical oversight to ensure the proper and consistent feed to the transportable grout equipment. Accurate blending of the dry materials is essential to successful grouting operations. General permit conditions in state dangerous waste regulations require the permittee to "properly operate and maintain all facilities and systems of treatment and control installed or used by the permittee to achieve compliance with the conditions of the permit". This regulation also specifies requirements for "proper operation and maintenance". Therefore, the DMF must be included in the permit application by addressing the following issues: 1) personnel training, 2) QA/QC plans, 3) a contingency plan for unexpected shut-down of the DMF, and 4) an inspection program. (173-303-810(6)) |
| 6.         | 2-5         | Line 33: The GTF transfer piping must be appropriately marked to identify mixed waste hazards. A sample mixed waste sign was provided to WHC personnel during the February 26, 1990 GTF unit managers meeting. This type of identification is consistent with discussions between WHC's Facility Compliance personnel and Ecology concerning the integration of mixed waste signs at the Hanford site. Replace "radiation" with "mixed waste". (173-303-310)   |
| 8.         | 2-7         | Line 28: Comment #6 also applies to the distribution piping.   |
| 9.         | 2-9         | Line 39: Discuss in detail the criteria which will be used to determine that the grout has solidified. In other words, at what point will the vault be considered a landfill? Some criteria which have been discussed by the unit managers include 1) non-destructive postsolidification verification results, 2) temperature changes within the vault, 3) results from grout tests with actual waste, 4) the amount of liquid entering the LDCRS, and 5) coring of the vault.   |
| 10.        | 2-11        | Although the PSW vault is not part of this application, it is beneficial to correlate data, problems, successes, etc. to the mixed waste vaults. It is therefore necessary that Ecology be provided with all data, reports, etc. which have resulted from the PSW campaign. Please provide all such information to our office as it becomes available. As part of this requirement, please provide our office with a copy of the video tapes produced within the vaults during this campaign and a report on the sampling and analysis of the leachate from the PSW vault. (173-303-390(3))  |

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17. 3-23 Line 34: The check sheet provided to Ecology should contain both the physical and chemical analysis indicated in Table 3-13 along with the detailed organic analysis depicted in Table 3-2. Explain why silver and iron are reported in Appendix 3J, but not listed in Table 3-13. Provide a detailed description of the how mixing is accomplished to simulate the TGE grout mixer. (173-303-300)
18. 3-8 The columns in Table 3-5 are still incorrectly labeled. Please correct. The "Equivalent Concentration" column must indicate that the values presented are in percent. To aid in the evaluation of the data presented, indicate the source for determining the toxicity category, e.g. EPA spill tables, NIOSH, etc. According to EPA spill tables, soluble cyanide salts, such as sodium hexacyano iron III, are toxicity category "A" substances. Therefore, Table 3-5 should be amended and the designation recalculated.
25. 7-26 Line 3: Insert "The retreatment plan will consist of in-situ re-solidification or removal from the vault for further processing. Under no circumstances will unsolidified wastes remain in the vault."  
  
Line 4: Edit to read "for approval within 60 days of determining the waste has not solidified and before being implemented."
26. 3-9 Line 33: Post-curing verification of the grout monolith must include the coring of, at least, the first mixed waste vault. Upon correlation of this coring (and the coring conducted at the PSW vault) to non-destructive verification methods, the need for coring additional vaults will be determined. Although coring may be partially suspended, all vaults must be designed to accommodate such coring should this activity be required in future vaults. (173-303-283 and -300)
27. 3-17 Line 39: The text must be revised to indicate that samples can be taken from the vault. How often will grout slurry samples be taken? What type of analysis will be done? The results of this analysis should be compared to both laboratory scale testing done on actual waste and the core samples from the vault. The comparison of these three types of samples may lead to the partial suspension of vault sampling or vault coring. (173-303-300)
28. 3-24 Line 22: Which table lists these sources? What page can it be found on? The application should specifically state "other low-level waste materials listed in Table 3-10". The term "low-level waste" is used in the response but not in the application.
29. 3-25 Line 43: Have the adiabatic calorimetry tests been completed? The response indicates that it is not, but the application

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provides some results from "adiabatic testing". If the testing is complete, please provide the test procedures and results; if not, the procedures alone should be provided until the results are complete. Temperature effects on the vault, liners and grouting process are still under review.

35. 3-33 Line 43: Sections 3.5.3 through 3.6.3 provide sampling and analysis details for the feed tank. No details, however, are provided for candidate tank sampling and analysis. If sampling and analysis of the candidate tanks are the same as the feed tank, then provide a statement indicating that is the case. Otherwise, provide details of candidate tank sampling and analysis or a reference to the applicable documents containing these details. (173-303-300)
36. 3-36 Line 6: Provide a discussion detailing the fact that a method does not currently exist to sample the tank sludge. Explain how sampling near the sludge-liquid interface best characterizes the waste.
38. 3-46 Line 8: Washington State Dangerous Waste Regulations do not exclude source, special nuclear, and by-product materials as does the federal RCRA program. Therefore, any radionuclides which exhibit toxicity, e.g. uranium, must be included in toxicity testing. (173-303-071)
45. 4-7 Please modify the text in accordance with the response.
53. 4-10 Line 33: Prior to using any additives, a request for their use must be submitted to Ecology. If Ecology agrees to their use, a permit modification will be made. Include a statement to this effect. (173-303-830)
54. 4-12 Line 11: Provide a discussion indicating that water is currently planned for use as the decontamination fluid and that the use of any other fluid will be requested from Ecology. If Ecology agrees to the alternate decontamination solution, a permit modification will be made. Include a statement to this effect. (173-303-830)
56. 4-12 Line 17: Recycling liquids, from a number of sources, into the vault is being investigated. It is our current position that liquids generated during the first mixed waste campaign should be carefully monitored and quantified. Based upon the resulting data, and analysis of their effects on grouting operations, recycling of liquids into future vaults may be permitted. Unless otherwise determined, all decontamination fluids must be routed back to the tank farms.

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59. 4-18 Line 14: Besides the LCT, what other tanks are being evaluated for compliance with tank regulations? When will these evaluations be complete? The application must contain a list of the tanks which will or may contain dangerous materials along with their age and required certifications. (173-303-283 and -640)
60. 4-18 Line 19: The response states that the LCT will fill every 2-5 days. Is this number based on all decontamination fluids, LDCRS, and sump fluids going to the LCT? Provide the liquid generation assumptions which led to this estimation. Explain the impact of emptying the LCT every 2-5 days on grouting operations. The fact that grout operations will be interrupted by other factors, thus allowing the collected liquids to be pumped back to the tank farms, should be taken into account. What is the chemical effect of adding LCT liquids to the feed tank or grout mixer on the grout formula?
68. 4-32 Line 5: The use of HDPE as a liner material for the grout facility is still under review. We expect that additional EPA Method 9090 testing, conducted at higher temperatures, will be required. The elevated temperatures (possibly 100 degrees centigrade) would account for equipment control limitations and add a factor of safety. Specific testing guidelines will be provided no later than May 17, 1990. (173-303-665(2)(a))
69. 4-33 The technical justification for only hydrostatically testing the vault for two days must be provided. Factors such as liner breakthrough, time of travel to the sump, and minimum quantities detected by the sump should be considered. How long does it take to fill the tank with water and how long does it take to empty it?
70. 4-38 Line 8: Ecology will determine the need for vadose zone monitoring based on the final liner design.
71. 4-39 As per the Response Action Plan, liquid in the LDCRS (including leachate) is expected. Add a statement at line 30: "The LDCRS is designed to handle the types and quantities of leachate identified in the Response Action Plan."
76. 5-25 Please modify the text in accordance with the response.
121. 11-4 The response cites the wrong section. Please correct.
122. 11-4 The grout closure plan is still under review. (173-303-610(3)(a))
123. 11-4 The grout closure plan is still under review. (173-303-610(3)(a))
126. 11-9 The grout closure plan is still under review. (173-303-610(3)(a))

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128. 11-9 The grout closure plan is still under review. (173-303-610(3)(a))
132. 11-40 Line 35: Although sodium bentonite is most often used as an admixture with local soils, calcium bentonite is sometimes used with increased performance. The use of both sodium bentonite and calcium bentonite must be evaluated.
134. 11-44 Line 29: Any requests for deviation from the regulations should be highlighted in a separate section of the application. This issue will be addressed in Ecology's forthcoming response to a January 3, 1990 letter from Messrs. Lerch and Izatt regarding closure plan format.
142. 3C-1 Comment #29 also applies here.
143. 3C-2 Comment #29 also applies here.
162. 5D1-8 The response cites the wrong page and/or line number. Please correct.
164. 5D1-9 The response cites the wrong page and/or line number. Please correct.
165. 5D1-12 The response cites the wrong page and/or line number. Please correct.
166. 5D1-13 The response cites wrong page and/or line number. Also, the typo was not corrected. Please correct.
173. 8E-1 The response is satisfactory but the reference is incorrect. The correct reference is Appendix 8D, not 8E. Please correct.
176. In order to monitor the progress of grout construction and development activities, DOE-RL/WHC must submit a brief monthly report to our office. This report should be submitted on the tenth of the month and should list activities begun, continued and/or completed during the previous calendar month. A list of activities that will be conducted in the following calendar month should also be included to allow sufficient time to schedule oversight activities. Any difficulty or new information which arises should be included along with the corrective measures taken. A description of the contracts let and research being pursued must also be provided. The first such report must be submitted April 10, 1990. The above information may be provided at a unit managers meeting, if held that month. (173-303-390(3))
177. A number of computer codes have been used in the design of the GTF. In order to evaluate the applicability and accuracy of these programs, a list of all the programs used in the development of

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this facility must be provided to our office. The list should include the program name, author's name, address and telephone number, the version and date of the program, and vendor literature describing the program. Evaluation of this information may result in a request to review the input data along with the generated results.

178. iii Line 17: Mixed wastes are regulated by both RCRA and Washington State Dangerous Waste Regulations, not just RCRA as indicated here. The text should be modified as such.
179. Part A The Part A Application must be updated to include the new design drawing and new date on which mixed waste will first be processed. In addition, the first page of the Part A Application must be reproduced so the entire EPA/State I.D. Number is printed.
180. 2-3 Line 14: Replace "north" with "northwest".
181. 2-3 Line 18: Are the miscellaneous areas referred to as the 600 Areas? If so, this should be stated.
182. 2-3 Lines 29 and 30: Replace "U.S. Ecology" with "US Ecology".
183. 2-3 Line 25: Delete "to encourage...industry.". Replace with "between the 200 East and 200 West Areas from the federal government.".
184. 2-3 Line 31: Delete "within the 1,000 acre tract". Replace with "5 miles south southeast of the 200 East Area".
185. 2-3 Line 43: Add "Only WNP No. 2 is in operation. The other two were never completely constructed.".
186. 2-3 Line 48: Replace "Game" with "Wildlife". This correction should also be made on Figure 2-1.
187. 2-4 Line 25: Edit to read "and, if necessary, chemical liquid additives."
188. 2-4 Line 26: Construction of the vaults, which are considered part of the GTF, has not been completed. The statement indicating that construction was completed in January 1988 should be modified or deleted.
189. 2-5 Line 33: Replace "radiation" with "mixed waste". See comment #6.
190. 2-6 Line 48: Add a statement indicating where in the application regulatory deviations are identified. See comment #134.

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191. 2-7 Line 39: What volume of liquid is expected to be unpumpable due to pump location, pump efficiency and pump design?
  192. 2-27 Replace "Department of Game" with "Department of Wildlife".
  193. 3-7 Line 49: Edit to read "greater than 0.01%".
  194. 3-9 Line 17: Both acetone and hexone have been identified as listed wastes in the tank farms. Analysis of candidate tanks and the feed tank must include these substances.
  195. 3-9 Line 26: Typo. "bases" should be "basis".
  196. 3-12 Line 11: The Washington State Department of Ecology accepts TCLP testing in lieu of EP Toxicity testing. Therefore, it is not necessary to conduct both tests. Once Ecology officially adopts TCLP, then EP Toxicity test results will no longer be accepted.
  197. 3-13 Lines 36 and 37: Edit these lines to indicate concentrations are in percent.
  198. 3-14 Table 3-6: See comment #18 for cyanide designation.
  199. 3-28 Line 47: Replace "173-303-090" with "173-303-101".
  200. 3-31 Line 28: Typo. "empiric" should be "empirical".
  201. 3-41 As per your response to comment #51, the use of tributyl phosphate is not anticipated. Therefore, delete Line 41.
  202. 3-42 The permit application states that the waste analyses are from EPA (1986) or (1984). The analytical procedures used should be from the most recent version of EPA procedures. The text and procedures should be modified in all applicable instances to comply with this requirement.
  203. 3-44 A number of modifications to the analytical procedures are discussed here and on the following pages. There are two significant factors influencing whether a procedural modification will be allowed: 1) the effect it will have on the test results, and 2) what the test results used for (designation or process). In order to allow modifications to the required analytical tests, it must be demonstrated how these modifications will affect the results of the tests. For example, it would not be anticipated that changes of the sample size or the use of Teflon beakers instead of glass would have a large effect on the results obtained from a given sample. However, using a different leach procedure could have a significant effect on results and would essentially be the same as not performing the EPA procedure. Ecology will

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evaluate whether a modification will be acceptable based on the effect on the final results. Acceptability is dependent on whether the test is conducted for performance evaluation or as a regulatory requirement, this should be noted within the text.

Note also that a number of the proposed modifications are currently being evaluated as part of the Single-Shell Tank Waste Characterization Plan. It would prevent duplication of some efforts if collaboration on these efforts occurred.

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- 204. 3-45 A reference is made to protocols and procedures contained in the DOE EIS (DOE 1987). These protocols and procedures should be stated in this document.
  - 205. 3-45 The use of a 1:20 dilution ratio instead of 1:1 is proposed for measuring corrosivity. This is not acceptable, the established ratios must be adhered to. Use of smaller sample sizes is preferable, if necessary.
  - 206. 3-46 Line 9: Ecology does not recognize the toxicity results from the nonradioactive compositionally representative concoctions proposed here. Only book designations or bioassay testing with actual materials are acceptable.
  - 207. 3-48 Procedures changed as a result of problem resolution should be submitted to Ecology. It will then be determined if the change should be treated as a minor or major modification to the permit.
  - 208. 3-53 Comment #62 also applies here.
  - 209. 4-1 Line 36: Edit to read "and, if necessary, liquid additives".
  - 210. 4-5 Tank R02 should be labeled "Air Deentrainer Tank" and the input to this tank should be "Air Deentrainer". As per your response to comment #51, the use of tributyl phosphate is not anticipated.
  - 211. 4-20 Line 32: Edit to read "progressing cavity-style pump".
  - 212. 4-22 Is this air filtration system separate from the relocatable vault exhauster? Discuss the reasoning for not monitoring volatile organic emissions from the LCT/mixer module or the vaults.
  - 213. 4-28 Please provide the most current vault construction schedule.
  - 214. 4-37 Line 4: Washington's Dangerous Waste Regulations specify that the liner must withstand physical contact with the waste or leachate, not just the leachate. Determine if EPA 9090 testing assessed compatibility with the waste or just the expected leachate. Provide a discussion on how the EPA 9090 testing was conducted to

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ensure the liner could withstand prolonged contact with the grout slurry in the event of a primary liner failure. (173-303-650(2))

215. 4-37 Line 6: Is the compatibility testing for the asphalt coating in Appendix 4K? If not, what is the status of the report described on this page?
216. 4-38 Line 23: It is stated here that the leachate sump has a 4000 gallon capacity. Page 4-33, line 31 indicates it is 3000 gallons. Page 7A-11 lists the capacity as 2900 gallons. Please clarify and correct.
217. 4-39 Line 10: In order to properly evaluate the design and construction of the vaults, Ecology must receive a copy of all engineer change notices as they are issued. This requirement is effective immediately. All engineer change notices which have been issued since the last submittal of this application should be forwarded to our office immediately.
218. 4-39 Line 22: Based on the maximum leachate head, pump capacity, flow characteristics, etc., what is the maximum flow of leachate which the LDCRS can handle?
219. 4-39 Line 30: The LDCRS must be constructed of materials chemically resistant to the waste and expected leachate. Provide a discussion of the compatibility of the LDCRS with the waste assuming a primary liner failure. (173-303-665(2))
220. 4-41 Line 19: What part of the definitive design is not complete?
221. 4-41 Line 27: Comment #220 also applies here.
222. 5-49 Line 5: This section states that analysis of drawdown data collected from wells 299-E25-32 and 299-E25-33 is "still in progress." Why has it taken two years to analyze aquifer test data from these two wells?
223. 5-50 Line 33: This section states that three piezometers (299-E25-30A and B, 299-E25-30A and B, 299-E25-32A and B) with dual completion have been completed to measure vertical hydraulic gradients at specific discrete locations near the grout facility. Numerous cases have been reported within the technical literature citing failure to isolate monitored zones within nested piezometers. Please provide data demonstrating that isolation has been provided within these boreholes.
224. 5-60 Line 20: Although the detection monitoring system is outlined, no explanation is given describing the reasoning used in determining where individual monitoring wells were placed. Provide a detailed

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explanation describing the process used to determine where individual monitoring wells would be located.

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225. 5-60 Line 8: This section references 40 CFR 265.91 Groundwater monitoring system, although it is not properly referenced in Section 5.6. The regulation states, ". . . (2)Monitoring wells (at least three) installed hydraulically downgradient (i.e., in the direction of decreasing static head) at the limit of the waste management area. Their number, locations, and depth must ensure that they immediately detect any statistically significant amounts of hazardous waste or hazardous waste constituents that migrate from the waste management area to the uppermost aquifer." Emphasis added. The operable term immediately detected is interpreted to mean detection within one sampling period of the time waste constituents have entered the groundwater. Whether this interpretation is correct is now being considered and will be further addressed during Ecology's next response.
226. 6-6 Line 20: If the single pump used during filling operations fails, how long will it take to replace the pump considering it may be radioactively and chemically contaminated? Is a spare pump maintained at the GTF?
227. 6-8 Line 8: Comment #6 also applies here.
228. 6-9 Line 40: Current Ecology policy designates 3 feet as acceptable aisle space. Please document that this criterion has been met?
229. 7-3 Line 14: Ecology must be provided with a copy of the building emergency plan for the GTF.
230. 7-14 Line 5: Delete "in Section 7.3.4". Replace with "below".
231. 9-2 Line 23: Replace "Game" with "Wildlife".
232. 9-5 Line 29: When will the release information be available?
233. 12-12 Line 19: Edit to read "will telephonically notify Ecology immediately after detecting the leak. A written report will be provided within 7 days after detecting the leak."
234. 12-12 Line 45: Typo. "survey-or" should be "surveyor".
235. 3I-ii The permit application states that, "[t]he procedures are only representative of those to be maintained . . ." The actual procedures which will be used must be provided. (173-303-806(4)).
236. 4I-3 It is difficult to find the Dames and Moore appendices within Appendix 4I. Please provide a means of quickly finding a

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particular Dames and Moore appendix. Since each page is numbered with a DOE-RL page number, we suggest identifying the first page of each Dames and Moore appendix with a DOE-RL number in the Dames and Moore table of contents.

237. 4I-34 In response to our November 21, 1989 letter concerning the GTF, WHC has verbally agreed not to use a 6 mil polyethylene sheet between the drainage gravel and the vault. It appears this agreement has not been incorporated into the application. Please correct and identify the material to be used as a substitute for the polyethylene sheet.
238. 7A-3 The proper abbreviation for the Washington Department of Ecology is "Ecology", not "WSDOE".
239. 7A-3 Does the "break" and "barrier" provide the same function? The difference between the two, or even the fact that there are two distinct parts to this barrier, is not provided in the application. A discussion regarding this issue must be presented. Is liquid diffusion or radiation protection the primary purpose of the barrier? When will the asphalt diffusion barrier report be complete? This document must be provided immediately upon completion.
240. 7A-5 Define "other appropriate receiver tanks".
241. 7A-5 Detail the testing to be conducted on the asphalt coating after it is emplaced?
242. 7A-5 Page 7A-11 states the detection precision of the LDCRS is 20 GPD. How is the criterion of 0.10 GPD for hydrostatic testing measured?
243. 7A-9 Edit to read "greater than 0.01%".
244. 7A-11 The calculations in Appendix A indicate 33 gallons, not 31 gallons as reported here. Please edit.
245. 7A-11 Should "20 GPD" be "20 gallons"?
246. 7A-13 EPA's Draft Minimum Technology Guidance on Double Liner Systems for Landfills and Surface Impoundments - Design, Construction and Operation recommends a minimum leak rate of 1 GPD per acre. Provide a specific reference for the "EPA recommendation of 20 GPD per acre". The ALR is still under review.
247. 7A-13 What is the regulatory or technical basis for allowing a leakage rate of 20 GPD or the averaging of leak rates over 30 days. The ALR is still under review.

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248. 7A-13 Comment #244 also applies here.
249. 7A-14 Edit "monitoring will continue on a quarterly basis" to read "monitoring frequency will gradually be reduced to a quarterly basis dependent upon Ecology approval".
250. 7A-14 What analyses will be conducted on the samples taken from the sump? How often will these samples be taken?
251. 7A-14 The recycling of liquids back to the vault is under investigation. See comment #56.
252. 7A-14 Comment #238 also applies here.
253. 7A-15 Comment #238 also applies here.

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**CORRESPONDENCE DISTRIBUTION COVERSHEET**

**Author** R. F. Stanley, Ecology      **Addressee** S. H. Wisness, DOE-RL      **Correspondence No.** 9001203

**Subject:** Notice of Deficiency: Grout Treatment Facility Dangerous Waste Permit Application

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		C. DeFigh-Price	B2-20	X
		B. R. Dickey	R1-43	X
		C. J. Geier	H4-57	X
		K. L. Hoewing	B3-06	X
		R. E. Lerch (Assignee)	B2-35	X
		H. E. McGuire	B2-35	X
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		J. E. Nolan	B3-01	
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		EDMC	H4-22	X
		TPAI&C	B2-35	



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