



Department of Energy

Richland Operations Office
P.O. Box 550
Richland, Washington 99352

0007498

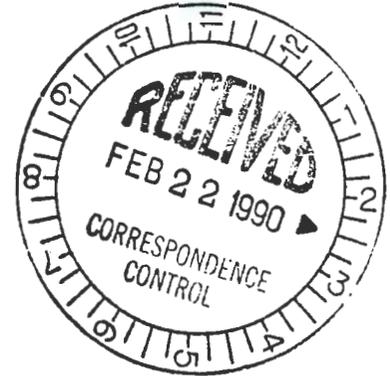
9000698

FEB 16 1990

START

Mr. P. T. Day, Hanford Project Manager
U.S. Environmental Protection Agency
Region 10
Post Office Box 550
Richland, Washington 99352

Mr. R. F. Stanley, Project Manager
State of Washington
Department of Ecology
Mail Stop PV-11
Olympia, Washington 98504-8711



Dear Messrs. Day and Stanley:

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

On November 21, 1989, Notice of Deficiency (NOD) comments for the July 1989 submittal of the 616 Nonradioactive Dangerous Waste Storage Facility (NRDWSF) Dangerous Waste Permit Application (Revision 0) were received from the Washington State Department of Ecology (Ecology). The letter of transmittal accompanying these comments requested that we respond to this NOD by responding to individual comments rather than by redrafting the permit application. Per your request, an NOD Response Table addressing these 70 comments is attached.

The enclosure is a modification of a Preliminary NOD Response Table discussed at a Unit Managers Meeting held with Mr. T. M. Michelena and Ms. M. Lerchen of Ecology on January 23, 1990. Several of the preliminary NOD responses have been revised based on discussions held at this meeting. The attached NOD Response Table also addresses 10 additional comments received at this meeting.

Per a letter transmitted to your office on December 18, 1989, we are anticipating your review of the attached NOD Response Table to be completed by April 20, 1990. If your review comments are transmitted to us by that date, we plan to submit a revised NRDWSF Dangerous Waste Permit Application (Revision 1) to you by June 19, 1990.



2011731094

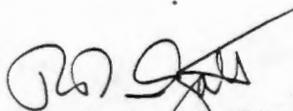
Messrs. Day and Stanley

-2-

FEB 16 1990

If you have any questions regarding the enclosure, please contact Mr. D. L. Duncan of the U.S. Department of Energy, Richland Operations Office on (509) 376-9333, or Ms. C. J. Geier of Westinghouse Hanford Company on (509) 376-2237.

Sincerely,



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



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

Enclosure: 616 NRDSWF Final NOD
Response Table

cc w/encl.:
R. E. Lerch, WHC
T. M. Michelena, Ecology

9011/810949

DISTRIBUTION COVERSHEET

Author R. C. Bowman, WHC	Addressee Mr. R. F. Stanley, Ecology Mr. P. T. Day, EPA	Correspondence No. Incoming 9000698
Subject 616 NONRADIOACTIVE DANGEROUS WASTE STORAGE FACILITY PERMIT APPLICATION (TSD: S-6-1)		

Internal Distribution

Approval	Date	Name	Location	w/att
		Correspondence Control		X
		DEFENSE WASTE MANAGEMENT		
		H. F. Daugherty	R2-53	
		G. T. Dukelow	R2-97	
		D. W. Lindsey	R2-82	
		S. H. Norton	T3-28	
		J. W. Olson	R2-82	
		L. W. Roberts	R2-80	
		R. J. Roberts	R2-97	
		ENVIRONMENTAL		
		R. C. Bowman	H4-57	
		L. C. Brown	H4-51	
		G. D. Carpenter	H4-15	
		L. P. Diediker	T1-30	
		W. T. Dixon	B2-35	
		F. A. Ruck III	H4-57	
		C. J. Geier	H4-57	
		W. L. Johnson	H4-55	
		R. E. Lerch (Assignee)	B2-35	
		H. E. McGuire	B2-35	
		L. L. Powers	B2-35	
		S. M. Price	H4-51	
		S. A. Wiegman	B2-19	
		K. A. Woodworth	H4-55	
		SAFETY, QUALITY ASSURANCE, AND SECURITY		
		J. R. Bell	R3-60	
		J. W. Hagan	R2-30	
		S. G. Hodge	R3-54	
		D. A. Jones	H4-16	
		K. R. Jordan	L0-11	
		P. R. Praetorius	S1-56	
		D. E. Simpson	B3-51	
		CONTROLLER		
		E. P. Vodney	B3-50	



0950101178

DISTRIBUTION COVERSHEET

Author R. C. Bowman, WHC	Addressee Mr. R. F. Stanley, Ecology Mr. P. T. Day, EPA	Correspondence No. Incoming 9000698
Subject 616 NONRADIOACTIVE DANGEROUS WASTE STORAGE FACILITY PERMIT APPLICATION (TSD: S-6-1)		

Internal Distribution

Approval	Date	Name	Location	w/att
		Correspondence Control		
		GENERAL COUNSEL		
		J. D. Bauer	B3-15	
		C. K. Disibio	B3-06	
		K. L. Hoewing	B3-06	
		cc: R. J. Bliss	B3-04	
		J. E. Nolan	B3-01	
		R. C. Nichols	B3-02	
		EDMC	H4-22	x
		RCB: File/LB	H4-57	x
		Attachment same as Letter #9050924		



90117810951

9 0 1 1 7 8 1 0 9 5 2

THE 616 NONRADIOACTIVE DANGEROUS WASTE
STORAGE FACILITY NOD RESPONSE TABLE

February 19, 1990
Page 1 of 22

No.	Comment/Response	Ecology Concurrence
1.	<u>Page 1-1, Section 1.1.</u> Citation reads "(WAC) 173-303-630 (Ecology 1989)."	
	<u>Ecology Requirement:</u> Citation must give most recent version of 173-303. This is currently January 1989. Please change the reference appropriately.	
	<u>Response:</u> The citation simply provides a reference to Chapter 15.0 where the full reference is given. The text will remain unmodified.	
2.	<u>Page 2-6, Section 2.1.2.2, 3rd Paragraph.</u> This paragraph discusses the containment and cleanup procedures for spills into the containment. A reference to Chapter 7.0 (Contingency Plan) should be given.	
	<u>Ecology Requirement:</u> Please modify this section accordingly.	
	<u>Response:</u> The text will be modified to include a reference to Chapter 7.0, Section 7.4.9.	
3.	<u>Page 2-7, Section 2.1.2.2, 2nd Paragraph.</u> The text discusses the location and design of the heating and ventilation system with no referenced design drawings.	
	<u>Ecology Requirement:</u> Please include the design drawings for the entire facility. This should include the ventilation and exhaust systems. This comment also applies to all other facility drawings.	
	<u>Response:</u> Drawings of the facility and heating, ventilation, and air conditioning system will be added.	
4.	<u>Page 2-7, Section 2.1.2.2.1.</u> The text states there is a 2 hour fire-wall and a 1.5 hour fire-rated door.	
	<u>Ecology Requirement:</u> The effectiveness of the fire barriers is only as good as the lowest fire rated component, in this case the doors. Please justify the difference in fire-rating between the doors and the walls. This justification should be sufficient for all similar fire-rating discrepancies stated throughout the text.	
	<u>Response:</u> National Fire Protection Agency (NFPA) 101 "Life Safety Code" specifically requires that a 1.5 hour door be placed in a 2 hour rated wall. In addition, see the Uniform Building Code, NFPA 80 (Fire Doors and Windows), Factory Mutual Approval Guide, Underwriters Laboratories, and the Building Materials Directory. The text will remain unmodified.	

9 0 1 1 7 8 1 0 9 5 3

THE 616 NONRADIOACTIVE DANGEROUS WASTE
STORAGE FACILITY NOD RESPONSE TABLE

February 19, 1990
Page 2 of 22

No.	Comment/Response	Ecology Concurrence
5.	<p><u>Page 2-8, Section 2.1.2.3, 3rd Paragraph.</u> The text states that administrative controls will prevent the release of dangerous wastes into the sink, with the associated discharge to the tile field, without detailing the administrative controls employed to accomplish this task.</p> <p><u>Ecology Requirement:</u> Detail the administrative controls utilized to prevent the discharge of dangerous wastes into the sink.</p> <p><u>Response:</u> A locking valve will be placed on the drain line from the sink and locked closed. Only liquids that are known to be non-regulated will be disposed of to the tile field. Operating procedures will be developed to provide administrative controls over this valve. This procedure will be included in the permit application (see response to comment number 69).</p>	
6.	<p><u>Page 2-9, Section 2.1.2.4.</u> The text outlines the equipment and material stored in the packaging and equipment handling area without a complete inventory of materials, or a reference to Chapter 6.0 (Procedures to Prevent Hazards) or Chapter 7.0 (Contingency Plan) for further discussion.</p> <p><u>Ecology Requirement:</u> Either provide a detailed inventory for this equipment or reference the appropriate section in this application for further discussion.</p> <p><u>Response:</u> Section 7.5.3 will list the minimum equipment to be maintained. A reference will be made in Section 2.1.2.4 and Section 6.3.1.3 to Section 7.5.3.</p>	
7.	<p><u>Page 2-9, Section 2.1.2.6.</u> The text describes the loading and unloading pad with the trench for liquid collection. The text further discusses the removal plug in the trench to allow rainwater to be discharged to a french drain. This is an extremely vulnerable aspect of the design of the 616 Building. It is difficult to ensure that the plug in this trench is always secured and functioning. Should a release occur into the french drain, clean closure would only become possible with a very expensive removal action.</p> <p><u>Ecology Requirement:</u> Outline the administrative controls which will ensure this requirement will not allow a discharge of hazardous constituents into the environment or design and implement a better valve system (as opposed to the plug) for the trench.</p> <p><u>Response:</u> The plug fitting in the trenches of the exterior loading pads will be modified so they can be locked closed. Only facility management personnel (or alternate) will have a key. Material will not be released until it is known to not be regulated either by process</p>	

9 0 1 1 7 8 1 0 9 5 4

THE 616 NONRADIOACTIVE DANGEROUS WASTE
STORAGE FACILITY NOD RESPONSE TABLE

February 19, 1990
Page 3 of 22

Ecology
Concurrence

No. _____ Comment/Response _____

7. (Cont'd)
knowledge or analytical testing. Note: There are two trenches connected to the french drain. Response is applicable to both. Operating procedures will be developed to provide administrative controls over this valve. This procedure will be included in the permit application (see response to comment number 69).

8. Page 2-9, Section 2.1.2.6. The plan discusses the 'french drain' associated with this facility but no drawings are provided.

Ecology Requirement: Please provide detailed drawings of the french drain system for this building. This comment also pertains to the tile field which is depicted only in a general manner.

Response: A drawing showing the french drain and tile field will be added.

9. Page 2-10, Section 2.1.2.6. The text states that the personnel will monitor the pH prior to discharging the contents of the trench without giving any justification for monitoring only pH.

Ecology Requirement: A pH only monitoring program for liquids in this trench prior to discharge is unacceptable. Due to the diverse nature of material handled in this facility and the consequences of a discharge to the french drain, a more detailed monitoring program is required. Please modify this section accordingly.

Response: As stated in Section 2.1.2.6, the trench is kept covered when the pad is not in use. Liquid is released from the trench based on pH alone only after the following:

- 1) It is known that no waste material has been introduced into the trenches.
- 2) The liquid is from a rainfall or snowmelt.

The only way rain/snow water can become regulated is if the trench or loading pad were contaminated. Based on prior knowledge of the pad, trench, and the source of liquid, there is no requirement to sample the liquid in the trench. The pH of the liquid is taken to ensure that Westinghouse Hanford design standards are not exceeded (pH < 4, or >10). Use of a more comprehensive testing program for rain water collected in the loading pad trenches is currently being evaluated.

9 0 1 1 7 8 1 0 9 5 5

THE 616 NONRADIOACTIVE DANGEROUS WASTE
STORAGE FACILITY NOD RESPONSE TABLE

February 19, 1990
Page 4 of 22

Ecology
Concurrence

- | No. | Comment/Response | |
|-----|---|--|
| 10. | <p><u>Page 2-10, Section 2.2.</u> The topographic map outlines the legal boundaries of the facility yet no legal description is given.</p> <p><u>Ecology Requirement:</u> Please provide a legal description of this facility.
<u>Response:</u> A legal description of the 616 NRDFS site will be provided.</p> | |
| 11. | <p><u>Page 2-10, Section 2.3.1.</u> Ecology is currently evaluating the necessity of requiring seismic analysis for all facilities on the Hanford Site. Section 2.3.1 will be re-evaluated upon completion of this determination.
<u>Response:</u> Until such time that additional direction is provided by Ecology, the text will remain unmodified.</p> | |
| 12. | <p><u>Page 2-17, Section 2.5.1.</u> The text outlines the facility's abilities for protection of groundwater yet no discussion is made of the french drain or tile field. Without properly addressing these issues, this section is inadequate.</p> <p><u>Ecology Requirement:</u> Please modify this section accordingly.
<u>Response:</u> The tile field is connected to the drains from the sinks on the 'clean' side of the building. The drain from the Packaging-Sampling Room will be equipped with a lockable valve. Only liquids that are known to be non-regulated will be disposed of to the tile field. The french drain is used to drain both loading pad trenches. The loading pad trenches are equipped with plugs that are kept locked and the only person(s) with a key is facility management. Liquid will be discharged to the french drain only after it is known that it is not regulated (see response to comment number 9). Section 2.5.1 will be amended.</p> | |
| 13. | <p><u>Page 2-18, Section 2.5.7.</u> The text states that the soil was compacted prior to construction of the 616 facility yet no details of this are given.</p> <p><u>Ecology Requirement:</u> Please detail how the soils were compacted prior to construction.
<u>Response:</u> The soil compaction procedure will be provided.</p> | |
| 14. | <p><u>Page 3-1, Section 3.1.</u> The text states that the generating units are responsible for designating the wastes they produce. This is true, however, this does not alleviate the receiving facility (i.e., 616 NRDFS) from verifying wastes accepted.</p> | |

9 0 1 1 7 8 1 0 9 5 6

THE 616 NONRADIOACTIVE DANGEROUS WASTE
STORAGE FACILITY NOD RESPONSE TABLE

February 19, 1990
Page 5 of 22

No.	Comment/Response	Ecology Concurrence
14.	<p>(Cont'd)</p> <p><u>Ecology Requirement:</u> Please modify this section to address the 616 facilities responsibility for waste verification. This must include modifying Section 3.0 to include a waste sampling program for verifying loads received at the facility.</p> <p><u>Response:</u> Washington Administrative Code 173-303-300(3) General Waste Analysis requires that "...The owner or operator of an offsite facility shall confirm, by analysis..." Because the 616 NRDWSF accepts only DOE-RL waste generated onsite (from facilities under the same ID number) it is not an offsite facility. Therefore, verification of the wastes accepted at the 616 NRDWSF is not required.</p>	
15.	<p><u>Page 3-2, Section 3-1.</u> The text states that 616 NRDWSF receives empty waste drums without discussing the sources or handling of these drums.</p> <p><u>Ecology Requirement:</u> Please modify this section or include a discussion elsewhere which better describes the empty drums received and the procedures for processing them.</p> <p><u>Response:</u> The text will be modified to clarify the handling of empty drums at the 616 NRDWSF.</p>	
16.	<p><u>Page 3-2, Section 3.1.</u> The text states that containerized wastes which cannot be assigned a waste code are accepted at this facility.</p> <p><u>Ecology Requirement:</u> Please detail why these wastes are accepted and how they are handled. This facility should only receive hazardous wastes destined for off-site shipment.</p> <p><u>Response:</u> There is no requirement in the Washington Administrative Code prohibiting a TSD from storing non-regulated waste. The non-regulated wastes stored at the TSD are normally destined for offsite shipment and disposal. The text will be modified to clarify that these wastes are non-regulated.</p>	
17.	<p><u>Page 3-5, Section 3.2, 4th Paragraph.</u> The text states "...waste is either tested for radioactivity or exempted from this testing based on waste location and history."</p> <p><u>Ecology Requirement:</u> Please provide a list, including justification, of onsite points of generation which would produce waste exempt from radiation screening.</p> <p><u>Response:</u> An explanation of how a generation site is exempted from radiation screening, as well as a list of exempt sites, will be included in the text. The text will also state that: 1) this list is subject to change and will be updated periodically, and 2) updates of this list will be incorporated into the permit as a minor modification.</p>	

9 0 1 1 7 3 1 0 9 5 7

THE 616 NONRADIOACTIVE DANGEROUS WASTE
STORAGE FACILITY NOD RESPONSE TABLE

February 19, 1990
Page 6 of 22

No.	Comment/Response	Ecology Concurrence
18.	<p><u>Page 3-5, Section 3.2.</u> The first bullet under 'Waste Disposal Analysis' states that the Treatment, Storage, and Disposal (TSD) staff will conduct a waste designation. Is this a verification of the designation provided by the generator or is this the first designation of the waste?</p> <p><u>Ecology Requirement:</u> Please clarify this statement. <u>Response:</u> Because the TSD is an onsite facility, the personnel designated as its technical staff also assist generators obtain proper waste designation. This is the first designation of the waste. The text will be modified to clarify this statement.</p>	
19.	<p><u>Page 3-6, Section 3-2, 1st Paragraph.</u> The text discusses the responsibilities of the TSD technical staff. Is this staff from the 616 NRDWSF or from another group at the Hanford Site?</p> <p><u>Ecology Requirement:</u> Please clarify 'staff.' <u>Response:</u> The TSD technical staff (assigned to the 616 NRDWSF) provides waste designation guidance to various site generators (see response to comment number 18). The text will be modified to clarify 'staff.'</p>	
20.	<p><u>Page 3-6, Section 3-2.</u> The 'Waste Spill or Leak Identification' paragraph should reference Chapter 7.0 (Contingency Plan).</p> <p><u>Ecology Requirement:</u> Please modify the text accordingly. <u>Response:</u> Chapter 7.0, Section 7.4.9 will be referenced in paragraph 3 'Waste Spill or Leak Identification.'</p>	
21.	<p><u>Page 3-6, Section 3.2.1.</u> This discussion states that "Discarded Chemical Formulations" constitute the bulk of the waste generated onsite. As "Discarded Chemicals" have a very specific meaning in WAC 173-303, this statement does not seem reasonable.</p> <p><u>Ecology Requirement:</u> Please define 'Discarded Chemical Formulations' and provide justification for this statement. <u>Response:</u> Section 3.2.1 will be amended to clarify the types of waste generated on the Hanford Site.</p>	

9 0 1 1 7 8 1 0 9 5 8

THE 616 NONRADIOACTIVE DANGEROUS WASTE
STORAGE FACILITY NOD RESPONSE TABLE

February 19, 1990
Page 7 of 22

No.	Comment/Response	Ecology Concurrence
22.	<p><u>Page 3-7, Table 3-3.</u> Apparently, Biological Testing was inadvertently omitted from this table.</p> <p><u>Ecology Requirement:</u> Please modify the table to include biological testing. <u>Response:</u> Biological testing will be added to Table 3-3.</p>	
23.	<p><u>Page 3-7, Table 3-3.</u> The Total Concentration Leachate procedure testing required for certain Land Disposal Restricted wastes is not on this table.</p> <p><u>Ecology Requirement:</u> Please justify this omission or include it as an appropriate designation. <u>Response:</u> The NRDWSF is solely a storage facility. Westinghouse contracts disposal of regulated waste with an approved off-site disposal facility. A letter is sent with each shipment indicating those materials banned from land disposal and the treatment technologies available. The contracted treatment, storage, and/or disposal facility is responsible for determining which of the listed treatment methods it will use. A note is included explaining that if an immobilization technology is used, TCLP testing of the immobilized material must be performed. The contracted disposal facility performs the TCLP testing. The certification statement sent to the off-site TSD identifying the land disposal restricted wastes will be included in the text.</p>	
24.	<p><u>Page 3-11, Section 3.2.3.</u> This section describes sampling methods for waste designation. Is this done at the 616 NRDWSF or at the point of generation?</p> <p><u>Ecology Requirement:</u> Please clarify this point. <u>Response:</u> The sampling is done at the point of generation; this section will be amended.</p>	
25.	<p><u>Page 3-11, Section 3.2.3, 2nd Paragraph.</u> This paragraph discusses sampling material which has phase separated by using a COLIWASA for obtaining a composite sample.</p> <p><u>Ecology Requirement:</u> Waste which has phase separated must be sampled and designated for each phase in the container. Please modify this sampling procedure to clarify this issue. <u>Response:</u> Section 3.2.3 will be amended to "sample analysis are performed on each phase of the waste."</p>	

9 0 1 1 7 8 1 0 9 5 9

THE 616 NONRADIOACTIVE DANGEROUS WASTE
STORAGE FACILITY NOD RESPONSE TABLE

February 19, 1990
Page 8 of 22

No.	Comment/Response	Ecology Concurrence
26.	<p>Page 3-12, Section 3.2.3. The first paragraph states that "...will be handled so that analytical interference...will be precluded." The second paragraph gives one example and no other justification or procedure is given.</p> <p><u>Ecology Requirement:</u> Further explanation of the steps taken to ensure cross contamination of samples and sampling equipment does not occur is required.</p> <p><u>Response:</u> The text will be modified to clarify the steps taken to ensure cross contamination does not occur.</p>	
27.	<p>Page 3-12, Section 3.2.4. This paragraph discusses the designation procedure to be followed if a continuous waste stream is generated onsite. This procedure would be to give a one-time designation with an annual verification of this designation. Although the annual verification may be acceptable (depending on the waste stream) more than the initial stream characterization would be required to ensure that the stream is consistent.</p> <p><u>Ecology Requirement:</u> Please modify this discussion to recognize a more intensive waste stream analysis required for an initial designation of a continuously generated waste stream.</p> <p><u>Response:</u> The text will be modified to further discuss initial analysis requirements.</p>	
28.	<p>Page 3-12, Section 3.2.5, 3rd Paragraph. This paragraph discusses designation based upon process knowledge. There is far to much reliance on process knowledge for waste stream characterization and designation on the Hanford Site. The Hanford Site staff should consider undertaking a site wide re-evaluation of the use of process knowledge to designate waste streams.</p> <p><u>Response:</u> Waste is designated using process knowledge [WAC-173-303-300(2)] only when the generator can certify what the waste is and has data available on that material. In all other cases the waste is analyzed as required in WAC-173-303. Westinghouse Hanford processes over 2,000 waste sample analyses per year. Process knowledge is used only when applicable and appropriate. The text will remain unmodified.</p>	

9 0 1 1 7 8 1 0 9 6 0

THE 616 NONRADIOACTIVE DANGEROUS WASTE
STORAGE FACILITY NOD RESPONSE TABLE

February 19, 1990
Page 9 of 22

No.	Comment/Response	Ecology Concurrence
29.	<p><u>Page 3-15, Section 3.2.5, 3rd Paragraph.</u> This paragraph states "[w]aste shipments are not analytically verified..." This is not acceptable.</p> <p><u>Ecology Requirement:</u> There must be some type of waste shipment verification (to include analytical verification) of incoming waste streams. This NOD will not mandate a specific frequency of verification but will require a revision of this section to include such sampling for inclusion in the next application submittal for review and approval.</p> <p><u>Response:</u> The statement will be removed (see response to comment number 14).</p>	
30.	<p><u>Page 3-18, Figure 3-6.</u> This figure is barely legible.</p> <p><u>Ecology Requirement:</u> Please enlarge this figure so it is more readable.</p> <p><u>Response:</u> The figure will be enlarged.</p>	
31.	<p><u>Page 4-4, Section 4.1.1.4.</u> This paragraph outlines the use of 'Aquapon' as a concrete sealant and refers the reader to Appendix 4C for further details. Appendix 4C only has the Material Safety Data Sheet for this product and no performance evaluations.</p> <p><u>Ecology Requirement:</u> Please provide further documentation on this product. Of particular importance will be information which details the performance of this material when exposed to the various waste types located in the 616 NRWWSF.</p> <p><u>Response:</u> Performance evaluations will be provided in Appendix 4C.</p>	
32.	<p><u>Page 4-4, Section 4.1.1.4.</u> The text describes cement crack repair yet there are no details of this procedure.</p> <p><u>Ecology Requirement:</u> Please provide a procedure for cement crack repair.</p> <p><u>Response:</u> A procedure will be provided.</p>	
33.	<p><u>Page 4-4, Table 4-3.</u> Table 4-3 states the Storage Cell Volume in gallons. This volume is based upon double stacking containers in rows as depicted in Figure 6-3. There should be no double stacking of drums which are in one row as is shown for Row 3 in the acid, combustible, oxidizer, and caustic cells.</p>	

9 0 1 1 7 8 1 0 9 6 1

THE 616 NONRADIOACTIVE DANGEROUS WASTE
STORAGE FACILITY NOD RESPONSE TABLE

February 19, 1990
Page 10 of 22

No.	Comment/Response	Ecology Concurrence
33.	<p>(Cont'd)</p> <p><u>Ecology Requirement:</u> Please modify Section 4.1.1.6, Table 4-3, Figure 6-3, and any other section affected by this comment.</p> <p><u>Response:</u> Containers will continue to be double stacked in the single drum rows. The text will be modified to limit the second tier to containers less than or equal to 30 gallons in size and weighing less than or equal to 100 pounds.</p>	
34.	<p><u>Page 4-5, Section 4.1.1.7.</u> The text describes the procedures for collecting run-on to the facility but no reference is made to Chapter 7.0 (Contingency Plan) where these procedures are spelled out in more detail.</p> <p><u>Ecology Requirement:</u> Please include a reference to the appropriate section.</p> <p><u>Response:</u> A reference will be added to Chapter 7.0, Section 7.4.9.</p>	
35.	<p><u>Page 5-1, Section 5.0.</u> This statement is true until the french drain or tile field systems receive dangerous wastes (see comment numbers 7 and 8).</p> <p><u>Response:</u> The tile field has been removed from potential contamination by addition of the locked drain valve (see the response to comment number 5). The locked valve in the loading pad trenches is a significant barrier to contaminating the french drain (see the response to comment number 7). The text will remain unmodified.</p>	
36.	<p><u>Page 6-1, Section 6.1.1.3.</u> This paragraph seems to say that the facility is occupied from 7:30 to 4:00 daily. This is misleading. Conversations with facility staff have shown that the facility is only occupied when waste is being received, moved, or inspected.</p> <p><u>Ecology Requirement:</u> Please clarify this section.</p> <p><u>Response:</u> The Hanford Site operates 24 hours a day, 365 days per year. The building can and may be occupied at any time. Generally, the building is occupied on Day Shift (beginning at 0730 and ending at 1600 hours). The facility is locked when vacant. The text will be modified to clarify this.</p>	
37.	<p><u>Page 6-4, Section 6.3.1.1.</u> The text describes the onsite communications system yet no references to locations are given.</p> <p><u>Ecology Requirement:</u> Please include in Figure 6-1 the locations of internal and external communications devices (see comment number 2).</p> <p><u>Response:</u> All communication devices will be shown in Figure 6-1.</p>	

9 0 1 1 7 8 1 0 9 6 2

THE 616 NONRADIOACTIVE DANGEROUS WASTE
STORAGE FACILITY NOD RESPONSE TABLE

February 19, 1990
Page 11 of 22

Ecology
Concurrence

- | No. | Comment/Response | Ecology
Concurrence |
|-----|---|------------------------|
| 38. | <p><u>Page 6-5, Section 6.3.1.3.</u> This section outlines the types of available emergency equipment but not the exact inventory.</p> <p><u>Ecology Requirement:</u> Please provide the inventory and locations of all emergency equipment.
<u>Response:</u> A reference to Chapter 7.0, Section 7.5.3 will be made.</p> | |
| 39. | <p><u>Page 6-7, Section 6.3.2.</u> The aisle space between the waste containers and the wall should be 3 feet.</p> <p><u>Ecology Requirement:</u> Please amend this section appropriately.
<u>Response:</u> As specified in Washington Administrative Code 173-303-340(3), the 616 NRWSF maintains sufficient aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment. The aisle spacings listed meet both the intent and letter of the National Fire Protection Association Codes and Washington Administrative Code. Please identify in writing the source of the requirement for a 3-foot aisle space.</p> | |
| 40. | <p><u>Page 6-9, Figure 6-3.</u> Please refer to comment number 33.
<u>Response:</u> Container storage locations will not change.</p> | |
| 41. | <p><u>Page 6-11, Section 6.5.1.</u> This paragraph states that water-reactive wastes are stored in waterproof cabinets in the flammable liquid storage cells. Figure 6-3 does not show these cabinets as part of the storage layout.</p> <p><u>Ecology Requirement:</u> Please modify Figure 6-3 accordingly. Similarly Figure 6-3 should show the location of other storage units (such as wall racks).
<u>Response:</u> A new figure will be added showing storage location layout in the NRWSF. This figure will show the locations of the floor storage areas and the open wire shelving. The weatherproof cabinets are designed to stand alone and will be placed in the flammable liquid storage cells on an as-needed basis. Hence, location of the cabinets will vary. The text will be modified to indicate that a 3 foot aisle space will be maintained between all shelving, cabinets, and adjacent drums.</p> | |

9 0 1 1 7 8 1 0 9 6 3

THE 616 NONRADIOACTIVE DANGEROUS WASTE
STORAGE FACILITY NOD RESPONSE TABLE

February 19, 1990
Page 12 of 22

No.	Comment/Response	Ecology Concurrence
42.	<p><u>Page 7-1, Section 7.0.</u> Paragraph 2 states this is a "summary emergency plan." This plan should not be a summary; it should be the entire emergency plan.</p> <p><u>Ecology Requirement:</u> Please modify accordingly. <u>Response:</u> The Contingency Plan found in Chapter 7 of the permit application is actually a compilation of specific requirements applicable to the facility that are maintained in several documents which constitute the Hanford Site emergency plan. The text will be modified to clarify this situation. The actual Contingency Plan for the 616 NRDWSF will be added to the permit application as an appendix when the revised plan is available per the Tri-Party Agreement compliance schedule (June 1990). However, specific names and phone numbers will not be included in this appendix for reasons of personal privacy.</p>	
43.	<p><u>Page 7-3, Section 7-2.</u> The emergency coordinator is not identified.</p> <p><u>Ecology Requirement:</u> The plan must identify (by name and position) the emergency coordinator for this facility. <u>Response:</u> The Contingency Plan currently identifies the emergency response phone number (811) and the Hanford Single Point of Contact (373-3800). By calling 811 or 373-3800, an individual (the Fire Department Battalion Commander and the Emergency Duty Officer) will be summoned who has the authority to act for the Building Emergency Director. The Fire Department Battalion Commander and the Emergency Duty Officer have the names and phone numbers of the primary and alternate Building Emergency Directors. The text will remain unmodified.</p>	
44.	<p><u>Page 7-3, Section 7.2.1, 2nd Paragraph.</u> The text states that the building emergency director is not on call 24 hours/day. The person who is on call must be familiar with the facilities and emergency procedures for this building.</p> <p><u>Ecology Requirement:</u> Please clarify the text to appropriately explain this. <u>Response:</u> Those persons authorized to act for the building emergency director during his absences are provided with sufficient information, training, and authority to allocate resources to respond to any emergency situation at the 616 Storage Facility. The Fire Department Battalion Commander and the Emergency Duty Officer have the names and phone numbers of the primary and alternate Building Emergency Director's. The text will be modified to indicate that all persons authorized to act for the building emergency director have the authority to commit all resources necessary for resolving an emergency situation at the 616 NRDWSF.</p>	

9 0 1 1 7 8 1 0 9 6 4
THE 616 NONRADIOACTIVE DANGEROUS WASTE
STORAGE FACILITY NOD RESPONSE TABLE

February 19, 1990
Page 13 of 22

Ecology
Concurrence

- | No. | Comment/Response | Ecology
<u>Concurrence</u> |
|-----|--|-------------------------------|
| 45. | <u>Page 7-5, Section 7.2.2.</u> The first bullet identifies the 'Building warden' in the emergency organization. What is a building warden?

<u>Ecology Requirement:</u> Please clarify this position.
<u>Response:</u> The building warden is a management individual assigned by the responsible building manager. Further discussion of the building warden's responsibilities is included in Section 7.2.2.1.3. The text will be modified to clarify this position. | |
| 46. | <u>Page 7-5, Section 7.2.2.1.</u> This section briefly explains the 'Building Emergency Organization' without identifying these key personnel.

<u>Ecology Requirement:</u> Please identify these persons.
<u>Response:</u> See response to comment number 43. | |
| 47. | <u>Page 7-14, Section 7.3.</u> The text discusses the NRDWSF emergency plan. This plan is apparently not included in this document.

<u>Ecology Requirement:</u> Please include the emergency plan in this document for review and approval.
<u>Response:</u> See response to comment number 42. | |
| 48. | <u>Page 7-18, Section 7.4.1.3, 1st Bullet.</u> The text references reportable quantities for notifications of releases. The State of Washington Dangerous Waste Regulations do not use reportable quantities for notification and response purposes.

<u>Ecology Requirement:</u> Please strike any reference to reportable quantities for releases to the environment. Ecology will address this issue on a site-wide basis in the General Hanford Permit. For purposes of this application, Ecology will provide guidance to Energy prior to the next NOD response cycle.
<u>Response:</u> Text associated with reportable quantities for notification of releases will be removed. Ecology guidance will be addressed when provided. | |
| 49. | <u>Page 7-18, Section 7.4.1.3, 4th Bullet.</u> The Ecology telephone number is the general Ecology reception number. The notification number for the Hanford Site should be (206) 438-7016.
<u>Ecology Requirement:</u> Please modify this bullet accordingly.
<u>Response:</u> The Ecology phone number will be included in the text. | |

9 0 1 1 7 8 1 0 9 6 5

THE 616 NONRADIOACTIVE DANGEROUS WASTE
STORAGE FACILITY NOD RESPONSE TABLE

February 19, 1990
Page 14 of 22

No.	Comment/Response	Ecology Concurrence
50.	<p>Page 7-20, Section 7.4.2, 5th Bullet. The fifth bullet discusses the possibility of permanent stabilization of spills. If clean closure is the strategy for this facility and Ecology-agrees not to insist on a Postclosure Plan for this facility, permanent stabilization is not an option for spill remediation.</p> <p><u>Ecology Requirement:</u> Either strike this language and revise any internal spill response procedures to ensure full removal of any release or submit a Postclosure Plan for addressing permanent stabilization as an option for spill remediation.</p> <p><u>Response:</u> Text associated with the permanent stabilization of spills will be removed.</p>	
51.	<p>Page 7-32, Section 7.4.16.1. The text mentions seismic activity as a potential natural event which could effect 616 NRDWSF operations. There is, however, no discussion in the application as to the facility's design capability of withstanding such an event.</p> <p><u>Ecology Requirement:</u> Please state the size of earthquake which the 616 NRDWSF could withstand without structural damage.</p> <p><u>Response:</u> There is currently no requirement in WAC 173-303 to address the capacity of the 616 Storage Facility to withstand a seismic event (see the response to comment number 11). The text will remain unmodified.</p>	
52.	<p>Page 7-33, Section 7.4.16.3. The last section on this page discusses the procedures to be implemented in case of an emergency power outage. The third bullet of this procedure states the outside doors will be opened and the inside doors will be closed "[i]f instructed by supervision, ..." The staff should be trained to the point that they could make this determination without approval from 'supervision'.</p> <p><u>Ecology Requirement:</u> Please modify this section accordingly or justify otherwise.</p> <p><u>Response:</u> The staff may not be fully aware of all conditions (e.g. high winds, fire, etc.) associated with the power outage/ventilation loss. Since the decision to open the outer building doors may be dependent on several factors that could potentially complicate the situation, this decision is better left to the discretion of supervision. The text will remain unmodified.</p>	
53.	<p>Page 7-37, Figure 7-4. This map is not readable.</p> <p><u>Ecology Requirement:</u> Please resubmit this map in a large scale.</p> <p><u>Response:</u> The map will be changed to improve readability.</p>	

9 0 1 1 7 8 1 0 9 6 6

THE 616 NONRADIOACTIVE DANGEROUS WASTE
STORAGE FACILITY NOD RESPONSE TABLE

February 19, 1990
Page 15 of 22

No.	Comment/Response	Ecology Concurrence
54.	<p><u>Page 7-44, Section 7.6.5.</u> This paragraph discusses the Hanford Exposure Evaluator. There is, however, no discussion of what this is.</p> <p><u>Ecology Requirement:</u> Please explain in the text of this section what the Hanford Exposure Evaluator is.</p> <p><u>Response:</u> The text will be modified to further detail the role of the Hanford Exposure Evaluator.</p>	
55.	<p><u>Page 11-2, Section 11.1.1.1.</u> This section discusses the decontamination of the equipment and concrete in the facility. The text states that decontamination will continue until the rinsate is no longer designated. The determination for decontamination will not be the solution but will be based upon how clean the equipment or concrete is.</p> <p><u>Ecology Requirement:</u> Please revise this section to properly address the decontamination of equipment and concrete. This must include established cleanup levels (to include sample verification) of the material in question.</p> <p><u>Response:</u> Verification wipe sampling will be performed on the concrete and accessible portions of the equipment which will have been in contact with contaminated materials. As with wipe sampling conducted in association with other sampling, detection of constituents of concern will initiate further action. In this case further decontamination will be conducted.</p>	
56.	<p><u>Page 11-2, Section 11.1.1.1, 2nd Paragraph.</u> The text states that background will be taken by coring the walkway. This is not adequate. Background will need to be at a point outside the potential area of impact. This would ideally be at a point outside of any of the operative (100, 200, etc.) areas.</p> <p><u>Ecology Requirement:</u> Please rewrite this section to include a more appropriate background sampling point. This comment applies to all discussions on background sampling in this application.</p> <p><u>Response:</u> Background is ideally located in uncontaminated material identical to the potentially contaminated material being assessed for concrete. A background sample must be taken in the same pour as the sample to be assessed for contamination (same aggregate and concrete). The walkway is the location in 616 NRDWSF appropriate for such sampling, because:</p> <ol style="list-style-type: none"><li data-bbox="223 1481 1074 1508">1) No waste handling operations ever occurred there.	

7 0 1 1 7 8 1 0 9 6 7

THE 616 NONRADIOACTIVE DANGEROUS WASTE
STORAGE FACILITY NOD RESPONSE TABLE

February 19, 1990
Page 16 of 22

No.	Comment/Response	Ecology Concurrence
56.	(Cont'd) 2) The walkway is sealed. 3) The top portion of the concrete will be removed before analysis. Variability of concrete, due to different sources of cement and aggregate, requires selection of background in the same pour as the concrete being assessed for contamination. In the case of the 616 NRDSWF, no other appropriate background sampling location besides the walkway are considered appropriate.	
57.	<u>Page 11-8, Section 11.1.4.3.</u> The text describes the process for decontaminating the walls of the facility. There is, however, no discussion of verification sampling. <u>Ecology Requirement:</u> Please revise this section to include verification sampling. This comment is also applicable to the discussion in Section 11.1.4.3.1 (Sampling and Decontamination of Concrete Floor). <u>Response:</u> Verification wipe sampling will be incorporated into the text.	
58.	<u>Page 11-11, Section 11.1.4.3.2, 2nd Paragraph.</u> The text discusses decontamination of the north "and/or" east loading pads. Both of these pads must be included in the sampling and decontamination process. <u>Ecology Requirement:</u> Please revise this section appropriately. <u>Response:</u> The text will be revised accordingly.	
59.	<u>Page 11-11, Section 11.1.4.3.2, 2nd Paragraph.</u> This paragraph also discusses the grid sampling process for the pads and the soils immediately surrounding the pads. There is no clear discussion of how extensive the grid will be in incorporating the adjacent soils. <u>Ecology Requirement:</u> Please expand this discussion to better clarify the extent of soil sampling (horizontal). The plan must extend several grid sizes off of the cement pad. <u>Response:</u> A defined approach for expanding the grid size off the pad will be incorporated into the text. The grid will be expanded at least one grid size off of the pad, but the number of samples will remain the same.	
60.	<u>Page 11-12, Section 11.1.4.3.2.</u> The first partial paragraph on this page states that soil samples will only be collected on the surface. This is not acceptable.	

9 0 1 1 7 8 1 0 9 6 8

THE 616 NONRADIOACTIVE DANGEROUS WASTE
STORAGE FACILITY NOD RESPONSE TABLE

February 19, 1990
Page 17 of 22

No.	Comment/Response	Ecology Concurrence
60.	<p>(Cont'd)</p> <p><u>Ecology Requirement:</u> The soil sampling must occur to a prescribed depth. Please revise this section to include vertical sampling of the soils.</p> <p><u>Response:</u> A reading of the text reveals that samples will be taken at 1 foot intervals until background levels are achieved for soils; however, the text will be reworded to make this strategy more obvious. Samples will be taken initially at the surface, 1 foot, and 3 feet. Soil removal will commence based on these results. Verification sampling will be included.</p>	
61.	<p><u>Page 11-12, Section 11.1.4.4.</u> The proposed constituents for analysis in sampling the tile and french drain systems are to be limited to those of documented spills. Due to the potential constituents which may be discharged to these systems, a full Appendix IX analysis must be accomplished.</p> <p><u>Ecology Requirement:</u> Please modify this section accordingly.</p> <p><u>Response:</u> The text will be modified accordingly.</p>	
62.	<p><u>Page 11-12, Section 11.1.4.4, 2nd Paragraph.</u> The text states that one core sample will be taken in the french drain system. This is inadequate.</p> <p><u>Ecology Requirement:</u> Please revise this section to include a more comprehensive sampling and analysis plan for this site.</p> <p><u>Response:</u> Due to the small size of the french drain and the apparent homogeneity of the contamination source (fluid), one sample is considered adequate. A detailed drawing of the french drain will be provided (see response to comment number 8).</p>	
63.	<p><u>Page 11-16, Section 11.1.7.</u> This section discusses potential extensions for the 180 day closure completion time limit. Lack of Congressional funding is given as an example of a reason for requesting an extension. Congressional funding is not an acceptable reason for requesting an extension.</p> <p><u>Ecology Requirement:</u> Delete the reference to Congressional funding.</p> <p><u>Response:</u> The reference will be deleted.</p>	

9 0 1 1 7 8 1 0 9 6 9

THE 616 NONRADIOACTIVE DANGEROUS WASTE
STORAGE FACILITY NOD RESPONSE TABLE

February 19, 1990
Page 18 of 22

Ecology
Concurrence

- | No. | Comment/Response | Ecology
Concurrence |
|-----|--|------------------------|
| 64. | <p><u>Page 11-17, Section 11.3.</u> At present there is no Postclosure Plan incorporated in the application. Due to the nature of this facility, Ecology agrees that clean closure is realistic and hence will not require submission of a Postclosure Plan at this time. This position will be evaluated yearly based upon the operating record of the facility. If at any time Ecology determines that releases to the environment have occurred and inappropriate responses have been made, a requirement for preparation and inclusion of a Postclosure Plan into the permit will be made. This annual facility review will be included in the permit once it is issued.</p> <p>Response: Every effort will be made to operate the facility so that it may be clean closed.</p> | |
| 65. | <p><u>Page 11-17, Section 11.6.</u> The closure cost estimate references the federal regulations. The plan must reference the appropriate state regulation.</p> <p><u>Ecology Requirement:</u> Please revise this section to include the proper state citation.</p> <p>Response: The text will be modified accordingly.</p> | |
| 66. | <p><u>Page 12-4, Table 12-1.</u> The table erroneously shows that the Closure Cost estimates are not required. Please refer to comment number 65.</p> <p><u>Ecology Requirement:</u> Please modify the table accordingly.</p> <p>Response: WAC 173-303-620(1)(c) exempts federal facilities from the requirements of closure cost estimates as stated in WAC 173-303-620(3)(a).</p> | |
| 67. | <p><u>Page 12-9, Section 12.4.1.6.1.</u> The last paragraph on this page discusses notification procedures. Ecology does not have reportable quantities as a trigger for notification of releases. We require notification of any release. Please refer to comment number 48.</p> <p><u>Ecology Requirement:</u> Please revise this section accordingly.</p> <p>Response: The text will be modified to remove any reference to reportable quantities (also see response to comment number 48).</p> | |
| 68. | <p><u>Page 12-15, Section 12.4.2.3.3.</u> The closure cost estimate references the federal regulations. The plan must reference the appropriate state regulation.</p> <p>Response: The text will be modified accordingly.</p> | |

9 0 1 1 7 8 1 0 9 7 0

THE 616 NONRADIOACTIVE DANGEROUS WASTE
STORAGE FACILITY NOD RESPONSE TABLE

February 19, 1990
Page 19 of 22

No.	Comment/Response	Ecology Concurrence
69.	<p><u>Appendix 2B-ii.</u> This appendix gives "Sample Procedures". Sample procedures are not adequate. The actual procedures must be given. This appendix will not be reviewed until the actual procedures are given. It should be noted that changes in the procedures (after the permit has been issued) would not require a major modification of the permit in most cases.</p> <p><u>Ecology Requirement:</u> Please submit the actual procedures for 616 NRDWSF operations for review and approval.</p> <p><u>Response:</u> The WAC-173-303-806(a)(viii) requires only "A description of procedures..." Because the 616 NRDWSF is operating, the procedures can change quite frequently depending on conditions and management practices. The sample procedures supplied cover the basic methods of operation of the facility. Current operating procedures can be viewed at any time at the facility.</p>	
70.	<p><u>Appendix 8A-ii.</u> This appendix gives "Sample Training Course Summaries". Sample summaries are not adequate. The actual course descriptions are required (see comment number 69).</p> <p><u>Ecology Requirement:</u> Please submit the actual training course descriptions for review and approval.</p> <p><u>Response:</u> Response: The WAC-173-303-806 requires only an outline and description of training. Training course summaries can change quite frequently due to changes in procedures, conditions, and management practices. The sample training course summaries which have been supplied are descriptions based on information extracted from actual training course summaries for 616 required training. However, it would be difficult to provide current training course summaries due to their mutability. Current training information can be viewed at any time at the facility.</p>	
<p>** The following comments were received from Ecology on January 23, 1990 **</p>		
71.	<p><u>Page 2-10, Section 2.2.</u> The requirements under WAC 173-303-806(4)(a) for the topographical map have not been met by Plate 2-2. There are several deficiencies.</p> <p><u>Requirement:</u> The map must show 1,000 feet around the facility; it currently depicts approximately 730 feet on the east and west sides. The map should also show any wells or sewers; none are shown. Although loading zones seem to be included, these are not clearly shown and may be confused with the structure or access roads. Please note that more than one map may be submitted to fulfill these requirements.</p>	

9 0 1 1 7 8 1 0 9 7 1
THE 616 NONRADIOACTIVE DANGEROUS WASTE
STORAGE FACILITY NOD RESPONSE TABLE

February 19, 1990
Page 20 of 22

No.	Comment/Response	Ecology Concurrence
71.	(Cont'd) Response: The map(s) will be modified to correct the noted deficiencies.	
72.	<u>Page 2-22, Section 2.8.1.</u> The plan states that when chemical wastes are received at the facility, "[s]ignificant discrepancies are noted on the first page of the manifest." It further states that copies of the manifest will be kept 'indefinitely'. <u>Requirement:</u> Discrepancies should be noted on every copy of the manifest under WAC 173-303-370. Copies of the manifests should be kept for three years. Please amend all appropriate sections of the plan. Response: The text will be modified to clarify this.	
73.	<u>Page 3-5, Section 3.2.</u> In the Waste Disposal Analysis it states that a review of the waste will be performed from information supplied by the generator. "If the information provided is correct and adequate, the TSD technical staff performs the following...", emphasis added. <u>Requirement:</u> Describe this review. Is there any analytical verification of generator information? State what steps will be taken if the information provided is not correct or adequate. Response: The text will be modified to indicate that no analytical verification of generator information is performed (also see response to comment number 14). The text will be modified to include the steps that are taken when inadequate information is provided by the generator.	
74.	<u>Page 3-17, Table 3-6.</u> The first NOD (submitted 11/21/89) states that this table needs to be enlarged for clarity. Note also that there is no key provided for the first table; it is meaningless without it. <u>Requirement:</u> Please enlarge these tables and provide keys for their interpretation. Response: The tables will be enlarged and appropriate keys will be provided.	
75.	<u>Page 4-4, Sections 4.1.1.3 through 4.1.1.7.</u> It is not possible to verify the assertions about safety features because the facility is not adequately described or illustrated. <u>Requirement:</u> Please submit copies of the contract design and specifications as well as any design reports available. Response: Please identify the safety features that are not adequately detailed so that additional information can be considered for incorporation into the permit application.	

9 0 1 1 7 8 1 0 9 7 2

THE 616 NONRADIOACTIVE DANGEROUS WASTE
STORAGE FACILITY NOD RESPONSE TABLE

February 19, 1990
Page 21 of 22

Ecology
Concurrence

No. _____ Comment/Response _____

76. Page 6-10, Section 6.4.5. The plan states that 'clean new containers' may be handled while wearing a less protective level of clothing than that required when handling waste containers.

Requirement: The less protective level of clothing is appropriate only for empty unused new containers. Please amend the text accordingly.

Response: The text will be modified accordingly.

77. Page 7-21, Section 7.4.3. The text discusses 'protective action guidelines'.

Requirement: Please define these guidelines.

Response: The text will be modified to define the 'protective action guidelines'.

78. Page 11-1, Section 11-1. The plan states "[p]rior to the end of the 20-year design life, the facility will be evaluated..." Under WAC 173-303-806(11)(a), the maximum length of time that a permit may be written for is 10 years. At the end of the permit life-span, the facility will need to be re-permitted; an evaluation will be necessary at this time.

Requirement: The plan should be amended to include a facility evaluation at the end of the permit life.

Response: The text will be modified to indicate that the facility will be evaluated at the end of the permit life.

79. Page 11-1, Section 7.4.3. The third bullet has language inconsistent with the closure performance standard under WAC 173-303-610(2)(a).

Requirement: The plan should be amended to reflect the applicable regulatory standard. The current language is appropriate only if the facility will be re-permitted and/or used for other purposes after closure; this should be clearly stated.

Response: The text will be modified to reflect the applicable regulatory standard.

9 0 1 1 7 8 1 0 9 7 3

THE 616 NONRADIOACTIVE DANGEROUS WASTE
STORAGE FACILITY NOD RESPONSE TABLE

February 19, 1990
Page 22 of 22

<u>No.</u>	<u>Comment/Response</u>	<u>Ecology Concurrence</u>
80.	<p><u>Page 11-9, Section 11.4.3.1.</u> The plan states that SW-846 (EPA 1986) or equivalent analytical testing methods will be used. Under WAC 173-303-110(3)(c), the most current edition and all updates of SW-846 are adopted for test procedures.</p> <p><u>Requirement:</u> Please amend the text here and in all other appropriate sections so that it is consistent with the Dangerous Waste Regulations.</p> <p><u>Response:</u> The text will be so modified.</p>	