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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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December 23, 1998

James E. Rasmussen, Director
U.S. Department of Energy
P.O. Box 550, MSIN: A5-15
Richland, WA 99352

William D. Adair
Fluor Daniel Hanford, Inc.
P.O. Box 1000, MSIN:H6-21
Richland, WA 99352

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Bechtel Hanford, Inc.
P.O. Box 969, MSIN: H0-09
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Richard S. Watkins
Pacific Northwest National Laboratory
P.O. Box 999, MSIN: P7-75
Richland, WA 99352

Dear Messrs. Rasmussen, Adair, Hughes, and Watkins:

Re: Approval of Quarterly Class 1 Modifications to the Hanford Facility Resource Conservation and Recovery Act (RCRA) Permit, Dangerous Waste Portion (Quarter Ending September 30, 1998, Condition I.C.3.)

The Washington State Department of Ecology (Ecology) has reviewed the above referenced quarterly Class 1 Modifications and is in agreement that these are Class 1 Modifications. Please find enclosed the signed Modification Notification Form for each modification, indicating Ecology's agreement of the classification. Modifications for this quarter included updating information in Part III and Part VI. Part III Class 1 Modifications pertain to the 200 Area Effluent Treatment Facility and the 305-B Storage Facility. The Part VI Class 1 Modifications pertain to the 300 Area Process Trenches.



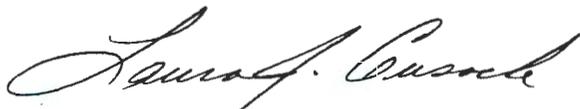
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Messrs. Rasmussen, Adair, Hughes, and Watkins
December 23, 1998
Page 2

Public notification of these modifications as required by Washington Administrative Code (WAC) 173-303-830(4)(A), will be given in the next edition of the "Hanford Update."

If you have any questions or comments, please contact me at (509) 736-3038.

Sincerely,



Laura J. Cusack, P.E.
Hanford Facility RCRA Permit Manager
Nuclear Waste Program

LJC:sdb

Enclosure: Quarterly Notification of Class 1 Modifications to the
Hanford Facility RCRA Permit (DW Portion)
Quarter Ending September 30, 1998

cc w/encl: Ellen Mattlin, USDOE
Suzette Thompson, FDH
Harold Tilden, PNNL
J.R. Wilkinson, CTUIR
Donna Powaukee, NPT
Russell Jim, YIN
Mary Lou Blazek, OOE
Administrative Record: SWP

cc w/o encl: Doug Sherwood, EPA
Cliff Clark, USDOE
Sue Price, FDH

Hanford Facility RCRA Permit Modification Notification Form

Unit:
Liquid Effluent Retention Facility and
200 Area Effluent Treatment Facility

Permit Part & Chapter:
Part III, Chapter 4 and Attachment 34
[Section III.4.A, 6.2.2.3.3]

Description of Modification:

Section 6.2.2.3.3, page 6-4, lines 28-50:

6.2.2.3.3 Leak Detection [F-2d(6)(a)(3)]. The leachate detection, collection and removal system is described in Chapter 4.0. The leachate collection sump pump is activated automatically when the liquid level in the leachate sump reaches a preset level. A flowmeter and totalizer measure the amount of leachate removed. An inspection is performed weekly where the totalizer reading and basin level reading are used to determine the leak rate per wetted surface area. The leak rate is compared to previous rates to see if leakage has increased.

The LERF employs a double-walled transfer piping between 242-A Evaporator and LERF and between LERF and ETF. The WAC 173-303-650 regulations do not require a discussion of piping for surface impoundments. However, for the purposes of comprehensive coverage of the LERF, inspections and integrity assessments are performed on the piping system. Aqueous waste (e.g., process condensate) is transferred from the 242-A Evaporator to the LERF via a buried pipeline. Likewise, aqueous waste is transferred to the ETF via buried pipelines. At the LERF dikes, aboveground piping serves to transfer waste from one basin to another.

The buried pipelines are normally inspected continuously monitored during transfers by a leak detection system (Chapter 4.0). The alarms on the leak detection system are monitored in the 242-A Evaporator and ETF control rooms. As an alternative to continuous leak detection, (The transfer lines from the LERF to the ETF also can be inspected daily during transfers by opening the secondary containment drain lines at the LERF catch basins (for 242-A Evaporator transfers to LERF) and the surge tank (for LERF transfers to ETF) to inspect for leakage. During the routine inspections at LERF, the aboveground piping system is inspected for signs of leakage and for general structural integrity. During the visual inspection, particular attention is paid to valves and fittings for signs of cracking, deformation, and leakage.

Reason for change: This modification eliminates an inconsistency between the text in Section 6.2.2.3.3 and Table 6-2.

Modification Class: ¹²³

Please check one of the Classes:

Class 1	Class ¹	Class 2	Class 3
X			

Relevant WAC 173-303-830, Appendix I Modification: A.1.

Enter wording of the modification from WAC 173-303-830, Appendix I citation:

A. General Permit Provisions

1. Administrative and Informational changes.

Submitted by Co-Operator: <i>Kenneth J. Swoboda</i> for C. G. Mattsson	Date 9/21/98	Reviewed by RL Program Office: <i>Helen E. Bilson</i> H. E. Bilson	Date 10/6/98	Reviewed by Ecology: <i>M. N. Jaraysi</i> M. N. Jaraysi	Date 10/19/98
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¹Class 1 modifications requiring prior Agency approval.

² This is only an advanced notification of an intended Class ¹, 2, or 3 modification, this should be followed with a formal modification request, and consequently implement the required Public Involvement processes when required.

³ If the proposed modification does not match any modification listed in WAC 173-303-830 Appendix I, then the proposed modification should automatically be given a Class 3 status. This status may be maintained by the Department of Ecology, or down graded to ¹1, if appropriate.

Hanford Facility RCRA Permit Modification Notification Form

Unit:
305-B Storage Facility

Permit Part & Chapter:
Part III, Chapter 2 and Attachment 18
[Section 4.1.1.1]

Description of Modification:

Section 4.1.1.1., page 4-1, line 19-27:

Containers in poor condition or inadequate for storage are not accepted at the unit. If transport is by unit personnel, such containers are not accepted for transport. See Section 6.4.1 for inspection prior to transport performed by unit personnel. "Container in poor condition or inadequate for storage" means a container which is not intact or undamaged and which is not securely sealed to prevent leakage during storage, transport and ultimate offsite disposal. Examples of acceptable packagings include laboratory reagent bottles, DOT containers, spray cans, sealed ampules with septums, paint cans, leaking containers which have been overpacked, etc. Unit operations personnel have the authority to determine whether a container is in poor condition or inadequate for storage, using the criteria of WAC 173-303-190 and professional judgement whether the packaging may leak during handling, storage and/or disposal.

Modification Class: ¹²³

Please check one of the Classes:

Class 1

Class¹

Class 2

Class 3

X

Relevant WAC 173-303-830, Appendix I Modification: A.1.

Enter wording of the modification from WAC 173-303-830, Appendix I citation:

A. General Permit Provisions:

1. Administrative and informational changes.

Submitted by Co-Operator:

A. K. Ikenberry 9-22-98
A. K. Ikenberry Date

Reviewed by RL Program Office:

R.F. Christensen 9/20/98
R.F. Christensen Date

Reviewed by Ecology:

J. J. Wallace 10/21/98
J. J. Wallace Date

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Hanford Facility RCRA Permit Modification Notification Form

Unit:
305-B Storage Facility

Permit Part & Chapter:
Part III, Chapter 2 and Attachment 18
[Section 4.1.1.1]

Description of Modification:

Section 4.1.1.1., page 4-1, lines 39-40:

All containers utilized for offsite transport of dangerous wastes at the unit are selected and shall according to the container selection criteria found in WAC 173-303-190(1). Containers utilized for off-site shipment shall also comply with all applicable criteria found in WAC 173-303-190.(2) and (3). 305-B personnel shall comply with WAC 173-303-190(4).

Modification Class: ¹²³

Please check one of the Classes:

Class 1	Class ¹ 1	Class 2	Class 3
X			

Relevant WAC 173-303-830, Appendix I Modification: A.1.

Enter wording of the modification from WAC 173-303-830, Appendix I citation:

A. General Permit Provisions:

1. Administrative and informational changes.

Submitted by Co-Operator:

Reviewed by RL Program Office:

Reviewed by Ecology:

<i>A. K. Ikenberry</i>	9-22-98	<i>R.F. Christensen</i>	9/20/98	<i>John P. Davis</i>	10/21/98
A. K. Ikenberry	Date	R.F. Christensen	Date	for J. J. Wallace	Date

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Hanford Facility RCRA Permit Modification Notification Form

Unit:
305-B Storage Facility

Permit Part & Chapter:
Part III, Chapter 2 and Attachment 18
[Section 4.1.1.2]

Description of Modification:

Section 4.1.1.2., page 4-2, lines 38-43:

Lab packs are prepared in the storage cell containing the hazard class(es) to be placed in the lab pack. The elephant trunk ventilator system may be is used to minimize respirable dusts from the absorbent material being used (usually vermiculite). Lab packs may also be prepared in the flammable liquid bulking module if appropriate; for instance, if compatible materials from more than one storage cell are being combined in a single lab pack drum. Lab packs may be prepared in the high bay storage area if storage of the completed lab pack is permitted there per Section 4.3.2.

Modification Class: ¹²³

Please check one of the Classes:

Class 1	Class ¹	Class 2	Class 3
X			

Relevant WAC 173-303-830, Appendix I Modification: A.1.

Enter wording of the modification from WAC 173-303-830, Appendix I citation:

A. General Permit Provisions:

1. Administrative and informational changes.

Submitted by Co-Operator:	Reviewed by RL Program Office:	Reviewed by Ecology:
<i>Alice K. Ikenberry</i> <i>9-22-98</i> A. K. Ikenberry Date	<i>R.F. Christensen</i> <i>9/30/98</i> R.F. Christensen Date	<i>Sheld P. Davis</i> <i>10/21/98</i> for J. J. Wallace Date

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Hanford Facility RCRA Permit Modification Notification Form

Unit:
305-B Storage Facility

Permit Part & Chapter:
Part III, Chapter 2 and Attachment 18
[Section 4.1.1.2]

Description of Modification:

Section 4.1.1.2, page 4-3, lines 11-13:

~~Compatibility of wastes to be bulked are fully characterized under the 305-B unit waste analysis plan in Section 3.2. Compatibility is determined using the information from generating unit designation information, process knowledge, laboratory analyses, and/or the compatibility determinations described in Section 6.5.2.~~

Modification Class: ¹²³

Please check one of the Classes:

Class 1	Class ¹	Class 2	Class 3
X			

Relevant WAC 173-303-830, Appendix I Modification: A.1.

Enter wording of the modification from WAC 173-303-830, Appendix I citation:

A. General Permit Provisions:

1. Administrative and informational changes.

Submitted by Co-Operator:

A. K. Ikenberry
A. K. Ikenberry

9-22-98
Date

Reviewed by RL Program Office:

R.F. Christensen
R.F. Christensen

9/30/98
Date

Reviewed by Ecology:

J. J. Wallace
for J. J. Wallace

10/21/98
Date

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Hanford Facility RCRA Permit Modification Notification Form

Unit:
305-B Storage Facility

Permit Part & Chapter:
Part III, Chapter 2 and Attachment 18
[Section 4.1.1.5 & 4.1.1.6]

Description of Modification:

Section 4.1.1.5. and 4.1.1.6, page 4-5, lines 4-14:

Flammable RMW is stored within its own secondary containment devices. ~~The description and capacity of the flammable RMW storage area is provided in 4.1.1.6.11. Small containers of flammable RMW are stored in a storage cabinet as noted in Section 4.3.1. Larger containers are stored in individual secondary containment devices (i.e., drip pans) to prevent runoff or mingling of spilled contents as described in Section 4.1.1.6.10.~~

4.1.1.6 Containment System Capacity [D-1a(6)]

Secondary containment is provided for all dangerous wastes stored at the 305-B unit. Storage limits for all chemicals are listed in Table 4-1 (1988 Uniform Building Code). All floors in the high bay area are sloped toward sumps which have no drains and are covered with grating to prevent safety hazards. In addition, all floors in the high bay area are coated with an epoxy based coating as described in Section 4.1.1.4. Inspection of the containment system to maintain integrity is described in Section 6.2. Individual secondary containment systems are configured as follows:

Modification Class: ¹²³

Please check one of the Classes:

Class 1

Class¹1

Class 2

Class 3

X

Relevant WAC 173-303-830, Appendix I Modification: A.1.

Enter wording of the modification from WAC 173-303-830, Appendix I citation:

A. General Permit Provisions:

1. Administrative and informational changes.

Submitted by Co-Operator:

Alice K. Ikenberry 9-22-98
A. K. Ikenberry Date

Reviewed by RL Program Office:

R.F. Christensen 9/30/98
R.F. Christensen Date

Reviewed by Ecology:

Greg P. Davis 10/21/98
for J. J. Wallace Date

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Hanford Facility RCRA Permit Modification Notification Form

Unit:
305-B Storage Facility

Permit Part & Chapter:
Part III, Chapter 2 and Attachment 18
[Section 4.1.1.6.1]

Description of Modification:

Section 4.1.1.6.1, page 4-5, lines 16-21:

4.1.1.6.1 Acids and Oxidizers Cell. The acids and oxidizers cell (cell 1) is located at the northwest corner of the 305-B unit high bay floor. The cell is constructed of epoxy-painted concrete block walls 4' high and incorporates a 1' deep sump at the west end of the cell. Six cabinets, open shelving, and a large-container storage area are provided within the cell to allow storage of various sizes of containers ~~store containers of recyclable materials and dangerous wastes.~~ The secondary containment volume of the individual sump for this cell is 67 gallons, and the total containment volume of the cell is 774 gallons. A diagram of the cell is provided in Figures 4-1. Storage capacity of the cell is limited by the UBC to not more than, 6000 cubic feet of oxidizing gases, 1000 lbs of ammonium nitrate and ammonium nitrate mixtures, and 500 lbs of solid oxidizers. A diagram of the cell is provided in Figure 4-1.

Modification Class: ¹²³

Please check one of the Classes:

Class 1

Class¹1

Class 2

Class 3

X

Relevant WAC 173-303-830, Appendix I Modification: A.1.

Enter wording of the modification from WAC 173-303-830, Appendix I citation:

A. General Permit Provisions:

1. Administrative and informational changes.

Submitted by Co-Operator:

Reviewed by RL Program Office:

Reviewed by Ecology:

A. K. Ikenberry
A. K. Ikenberry

9-22-98
Date

R.F. Christensen
R.F. Christensen

9/30/98
Date

Shelby P. Davis
for J. J. Wallace

10/21/98
Date

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Hanford Facility RCRA Permit Modification Notification Form

Unit:
305-B Storage Facility

Permit Part & Chapter:
Part III, Chapter 2 and Attachment 18
[Section 4.1.1.6.2 & 4.1.1.6.3]

Description of Modification:

Section 4.1.1.6.2 and 4.1.1.6.3, page 4-5, lines 23-39:

4.1.1.6.2 Poisons and Class 9 Cell. The poisons and Class 9 cell (cell 2) is located just south of the acids and oxidizers cell along the west wall of the high bay. This cell is also constructed of epoxy-painted concrete block walls 4' high and incorporates a 1' deep sump along its west end. Three storage cabinets and several sets of open shelving are positioned in the cell to allow storage of various sizes of containers. The northeast corner of the cell is sectioned off with a 6" spill retention berm to allow PCB storage for disposal complying with 40 CFR 761.65(b). The secondary containment volume of the individual sump for this cell is 117 gallons, and the total containment volume of the cell is 782 gallons. ~~Due to space limitations, no more than 800 gallons of liquid poisons and/or Class 9's will be stored at one time. There is no UBC restriction on storage of poisons or Class 9's at the 305-B unit.~~ A diagram of this cell is provided in Figure 4-2.

4.1.1.6.3. Alkaline, Caustics, Washington State Criteria-Only Wastes, Organic Peroxides, and Non-Regulated Waste Cell. The alkaline, caustics, Washington State only waste, and non-regulated waste cell (cell 3) is located adjacent to the poisons and Class 9 cell on the west wall of the high bay area. This cell is also constructed of epoxy-painted concrete block walls 4' high and incorporates a 1' deep sump along its west end. Four storage cabinets, 3 sets of open shelving, and 1 explosion proof refrigerator, are positioned in the cell to allow storage of various sizes of containers. The secondary containment volume of the individual sump for this cell is 137 gallons, and total containment volume of the cell is 764 gallons. ~~Due to space limitations, no more than 800 gallons of liquids will be stored at one time in this cell.~~ A diagram of this cell is provided in Figure 4-3.

Modification Class: ¹²³

Please check one of the Classes:

Class 1	Class ¹	Class 2	Class 3
X			

Relevant WAC 173-303-830, Appendix I Modification: A.1.

Enter wording of the modification from WAC 173-303-830, Appendix I citation:

A. General Permit Provisions:

1. Administrative and informational changes.

Submitted by Co-Operator:	Reviewed by RL Program Office:	Reviewed by Ecology:
<p><i>A. K. Ikenberry</i> 9/22/91 A. K. Ikenberry Date</p>	<p><i>R.F. Christensen</i> 9/30/91 R.F. Christensen Date</p>	<p><i>Gale P. Davis</i> 10/24/91 for J. J. Wallace Date</p>

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Hanford Facility RCRA Permit Modification Notification Form

Unit:
305-B Storage Facility

Permit Part & Chapter:
Part III, Chapter 2 and Attachment 18
[Section 4.1.1.6.4]

Description of Modification:

Section 4.1.1.6.4, page 4-5, lines 41-50; and page 4-6, lines 1-2:

4.1.1.6.4 Organics Cell. The organics cell (cell 4) This cell is located south of the alkaline caustics, Washington State only waste, and non-regulated waste cell. As with the other three cells described above, this cell is constructed of epoxy-painted concrete block walls 4' high and incorporates a 1' deep sump along its west end. The secondary containment volume of the individual sump for this cell is 119 gallons, and total containment volume of the cell is 687 gallons. A diagram of this cell is provided in Figure 4-4.

Ignitable organic waste materials are stored in this cell that also unless they are non-ignitable and exhibit the characteristics of corrosivity, toxicity as well as reactivity. Three Factory Mutual-approved flammable liquid storage cabinets are utilized for storage of various classes of flammable liquids as defined by the UFC. The capacities of the various cabinets are shown in Table 4-2 Section 4.3.1. The following cabinets also are used for storage in this cell: one for combustibles, one for aerosols, two for flammable solids, and one for overflow from one of the other cabinets.

Modification Class: ¹²³

Please check one of the Classes:

Class 1	Class ¹	Class 2	Class 3
X			

Relevant WAC 173-303-830, Appendix I Modification: A.1.

Enter wording of the modification from WAC 173-303-830, Appendix I citation:

A. General Permit Provisions:

1. Administrative and informational changes.

Submitted by Co-Operator:	Reviewed by RL Program Office:	Reviewed by Ecology:
<i>A. K. Ikenberry</i> 9-22-98 A. K. Ikenberry Date	<i>R.F. Christensen</i> 9/30/98 R.F. Christensen Date	<i>Yvette Davis</i> 10/21/98 J. J. Wallace Date

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Hanford Facility RCRA Permit Modification Notification Form

Unit:
305-B Storage Facility

Permit Part & Chapter:
Part III, Chapter 2 and Attachment 18
[Section 4.1.1.6.4 & 4.1.1.6.5]

Description of Modification:

Section 4.1.1.6.4 and 4.1.1.6.5, page 4-6, lines 19-26:

To maintain required aisle spaces and functional usability, the liquid capacity of the organics cell (cell 4) the hydrocarbon cell is set at 1000 gallons.

4.1.1.6.5 Flammable Liquids Bulking Module. The flammable liquids bulking module (cell 5), along with its purpose of providing a ventilated area for bulking of compatible ignitable hydrocarbon-wastes, is used as an independent storage cell. Secondary containment is provided by the walls of the module, which have been sealed at the floor joint by use of grout coated with epoxy paint. Flammable gases in cylinders, liquefied flammable gases, and oxidizing gases will be stored in the bulking module.

Modification Class: ¹²³

Please check one of the Classes:

Class 1	Class ¹	Class 2	Class 3
X			

Relevant WAC 173-303-830, Appendix I Modification: A.1.

Enter wording of the modification from WAC 173-303-830, Appendix I citation:

A. General Permit Provisions:

1. Administrative and informational changes.

Submitted by Co-Operator:	Reviewed by RL Program Office:	Reviewed by Ecology:
<i>Alice K. Ikenberty</i> 9-22-98 A. K. Ikenberty Date	<i>R.F. Christensen</i> 9/30/98 R.F. Christensen Date	<i>Gerald P. Davis</i> 10/21/98 for J. J. Wallace Date

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Hanford Facility RCRA Permit Modification Notification Form

Unit:
305-B Storage Facility

Permit Part & Chapter:
Part III, Chapter 2 and Attachment 18
[Section 4.1.1.6.5.a]

Description of Modification:

Section 4.1.1.6.5.a, page 4-6, line 31-39:

4.1.1.6.5.a. Flammable Liquids Storage Module. The flammable liquids storage module is a self-contained storage module (cell 8) that allows additional storage space for flammable wastes. Located on the southeast wall, it is connected to the buildings fire suppression system. The flammable storage module has a 2-hour fire rated containment system so that according to the UFC, an unlimited capacity is allowed. However, the flammable waste storage capacity of the flammable liquid storage module is limited by the 240 gal. capacity of the module's secondary containment system. No more than 240 gal of any combination of flammable liquid classes will be stored in the module. This flammable waste storage capacity is in addition to the flammable storage limits for the highbay. A diagram of the module is provided in Figure 4-10.

Modification Class: ¹²³

Please check one of the Classes:

Class 1	Class ¹	Class 2	Class 3
X			

Relevant WAC 173-303-830, Appendix I Modification: A.1.

Enter wording of the modification from WAC 173-303-830, Appendix I citation:

A. General Permit Provisions:

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Submitted by Co-Operator:	Reviewed by RL Program Office:	Reviewed by Ecology:
<i>A. K. Ikenberry</i> 9-22-98 A. K. Ikenberry Date	<i>R.F. Christensen</i> 9/30/98 R.F. Christensen Date	<i>Gretchen P. Davis</i> 10/21/98 J. J. Wallace Date

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Hanford Facility RCRA Permit Modification Notification Form

Unit:
305-B Storage Facility

Permit Part & Chapter:
Part III, Chapter 2 and Attachment 18
[Section 4, Figure 4-2]

Description of Modification:

Section 4, page 4-8, Figure 4-2, lines 23-27:

- 2A Poisons (P>G>H and III) (Large Cabinet)
- 2B Poisons (P>G>I) (Large Cabinet)
- 2C Class 9 (nonreactive) (Large and Small Shelf)
- 2D Class 9 (reactives) (Large Cabinet)
- 2E PCB's

Modification Class: ¹²³

Please check one of the Classes:

Class 1	Class ¹	Class 2	Class 3
X			

Relevant WAC 173-303-830, Appendix I Modification: A.1.

Enter wording of the modification from WAC 173-303-830, Appendix I citation:

A. General Permit Provisions:

1. Administrative and informational changes.

Submitted by Co-Operator:

A. K. Ikenberry 9-22-98
A. K. Ikenberry Date

Reviewed by RL Program Office:

R.F. Christensen 9/30/98
R.F. Christensen Date

Reviewed by Ecology:

Shelley P. Davis 10/21/98
for J. J. Wallace Date

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Hanford Facility RCRA Permit Modification Notification Form

Unit:
305-B Storage Facility

Permit Part & Chapter:
Part III, Chapter 2 and Attachment 18
[Section 4, Figure 4-3]

Description of Modification:

Section 4, page 4-9, Figure 4-3, lines 1-38:

Figure 4-3. Alkaline, Washington State Criteria Waste, Organic Peroxides, Washington-Only and Non-Regulated Waste Cell

~~3A1A Alkaline (liquids and solids) Liquid Oxidizers (Medium Cabinet)~~
~~3B1B Alkaline/Oxidizers Solid Oxidizers (Small Cabinet)~~
~~3C1C Organic Peroxides and temperature sensitive (refrigerator) Inorganic Acids (Medium Cabinet)~~
~~3D1D Washington State Criteria Waste (2 large shelves) Organic Acids (corrosive) (Small Cabinet)~~
~~3E1E Non-Regulated Liquids/Solids Mercury/Corrosive Solids (Small Shelf)~~

15.24cm W x 127CM H epoxy coated concrete block wall

Secondary Containment Trench

~~Drum and Carboy Storage Area~~

Modification Class: ¹²³

Please check one of the Classes:

Class 1	Class ¹	Class 2	Class 3
X			

Relevant WAC 173-303-830, Appendix I Modification: A.1.

Enter wording of the modification from WAC 173-303-830, Appendix I citation:

A. General Permit Provisions:

1. Administrative and informational changes.

Submitted by Co-Operator:	Reviewed by RL Program Office:	Reviewed by Ecology:
<i>Alice K. Ikenberry</i> 7/22/98 A. K. Ikenberry Date	<i>R.F. Christensen</i> 9/30/98 R.F. Christensen Date	<i>Sheld P. Jarvis</i> 10/21/98 for J. J. Wallace Date

¹Class 1 modifications requiring prior Agency approval.

² This is only an advanced notification of an intended Class ¹, 2, or 3 modification, this should be followed with a formal modification request, and consequently implement the required Public Involvement processes when required.

³ If the proposed modification does not match any modification listed in WAC 173-303-830 Appendix I, then the proposed modification should automatically be given a Class 3 status. This status may be maintained by the Department of Ecology, or down graded to ¹1, if appropriate.

Hanford Facility RCRA Permit Modification Notification Form

Unit:
305-B Storage Facility

Permit Part & Chapter:
Part III, Chapter 2 and Attachment 18
[Section 4.1.1.6.6 & 4.1.1.6.7]

Description of Modification:

Sections 4.1.1.6.6 and 4.1.1.6.7, page 4-10, lines 1-19:

4.1.1.6.6 Ignitable Waste Drum Storage Area. An additional section of the high bay (cell 8) has been dedicated to storage of drum quantities of ignitable waste prior to offsite shipment. The area is bordered on the north and south sides by angle iron (3½"x6") bolted to the floor (see Plate 2, Appendix 4A for detail) and sealed to provide secondary containment. The area is approximately 15'x7'. To further enhance containment and to allow greater storage capacity, the drums stored in this area are stored in flammable liquid drum storage cabinets.

Sump containment capacity of this area is approximately 224 gallons and total containment capacity is approximately 431 gallons. Maximum storage in this area is approximately six 55-gallon drums and 12 five-gallon drums. A diagram of this area is included in Figure 4-6. Additional ignitable waste storage is provided for in cell 4, organics cell, and the in the Highbay storage area. The high bay storage area has five additional flammable liquid drum storage cabinets located along the west side of the high bay (see Figure 4-7). All of this ignitable waste storage is provided for utilizing flammable liquid storage cabinets for added safety.

4.1.1.6.7 Oxidizer Waste Drum Storage Area. A second section of the high bay (cell 12) has been dedicated to storage of drum quantities of oxidizer waste prior to offsite shipment. The area is constructed similarly to the ignitable waste drum storage area (see above) and is also 10'x7' in size. Waste drums stored in this area are stored on pallets to prevent contact with spilled wastes in the event of an incident.

Modification Class: ¹²³

Please check one of the Classes:

Class 1	Class ¹	Class 2	Class 3
X			

Relevant WAC 173-303-830, Appendix I Modification: A.1.

Enter wording of the modification from WAC 173-303-830, Appendix I citation:

A. General Permit Provisions:

1. Administrative and informational changes.

Submitted by Co-Operator:	Reviewed by RL Program Office:	Reviewed by Ecology:
<i>Alice K. Ikenberry</i> A. K. Ikenberry Date	<i>R.F. Christensen</i> R.F. Christensen Date	<i>Shelley P. Davis</i> for J. J. Wallace Date
9-22-98	9/30/98	10/21/98

¹Class 1 modifications requiring prior Agency approval.

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Hanford Facility RCRA Permit Modification Notification Form

Unit:
305-B Storage Facility

Permit Part & Chapter:
Part III, Chapter 2 and Attachment 18
[Section 4.1.1.6.8 & 4.1.1.6.9]

Description of Modification:

Sections 4.1.1.6.8 and 4.1.1.6.9, page 4-10, lines 25-38:

4.1.1.6.8 Acid Waste Drum Storage Area. A third section of the high bay (cell 13) has been designated for storage of drum quantities of acid waste prior to offsite shipment. The area is approximately 10'x10' in size. Waste drums stored in this area are stored on pallets to prevent contact with spilled wastes in the event of an incident. Bulked drums containing acids, with oxidizers as a secondary hazard, will be placed in the cell 1 drum area, to prevent any possibility of a reaction with surrounding hazards in the high bay drum storage area. A diagram of this area is included in Figure 4-6.

4.1.1.6.9. Caustic Waste Drum Storage Area. A fourth section of the high bay (cell 14) has been designated for storage of drum quantities of caustic waste prior to offsite shipment. The area is approximately 22'x15' in size. Waste drums stored in this area are stored on pallets to prevent contact with spilled wastes in the event of an incident. Sump containment capacity in this area is approximately 110 gallons and total containment capacity is approximately 380 gallons. Maximum storage in this area is thirty-two 55-gallon drums. The location of the area is shown on the High Bay Storage Area diagram Figure 4-7.

Modification Class: ¹²³

Please check one of the Classes:

Class 1	Class ¹	Class 2	Class 3
X			

Relevant WAC 173-303-830, Appendix I Modification: A.1.

Enter wording of the modification from WAC 173-303-830, Appendix I citation:

A. General Permit Provisions:

1. Administrative and informational changes.

Submitted by Co-Operator:	Reviewed by RL Program Office:	Reviewed by Ecology:
<i>A. K. Ikenberry</i> 9-22-98 A. K. Ikenberry Date	<i>R.F. Christensen</i> 9/30/98 R.F. Christensen Date	<i>Shirley P. Davis</i> 10/21/98 <i>for</i> J. J. Wallace Date

¹Class 1 modifications requiring prior Agency approval.

² This is only an advanced notification of an intended Class ¹, 2, or 3 modification, this should be followed with a formal modification request, and consequently implement the required Public Involvement processes when required.

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Hanford Facility RCRA Permit Modification Notification Form

Unit:
305-B Storage Facility

Permit Part & Chapter:
Part III, Chapter 2 and Attachment 18
[Section 4.1.1.6.10]

Description of Modification:

Section 4.1.1.6.10, page 4-10, lines 45-46:

Due to space limitations in the individual cells, and for ease of mechanical handling, the high bay floor is typically used for storage of nonradioactive chemicals in drums. There is also capacity for six drums of ignitable waste storage inside of four flammable liquid drum storage cabinets located along the west side of the high bay (see Figure 4-7).

Modification Class: ¹²³

Please check one of the Classes:

Class 1

Class¹1

Class 2

Class 3

X

Relevant WAC 173-303-830, Appendix I Modification: A.1.

Enter wording of the modification from WAC 173-303-830, Appendix I citation:

A. General Permit Provisions:

1. Administrative and informational changes.

Submitted by Co-Operator:

Alice K. Ikenberry
A. K. Ikenberry

9-22-98
Date

Reviewed by RL Program Office:

R.F. Christensen
R.F. Christensen

9/30/98
Date

Reviewed by Ecology:

J. J. Wallace
J. J. Wallace

10/21/98
Date

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Hanford Facility RCRA Permit Modification Notification Form

Unit:
305-B Storage Facility

Permit Part & Chapter:
Part III, Chapter 2 and Attachment 18
[Section 4.1.1.6.11]

Description of Modification:

4.1.1.6.11, page 4-16, lines 19-29:

4.1.1.6.11 Flammable RMW Storage Area. Due to UBC restrictions, flammable radioactive mixed waste cannot be stored in the basement of 305-B with the other radioactive mixed waste. The flammable RMW received by 305-B for storage prior to disposal is stored in a separate area above grade in the east portion of the building in a 7'x 7'x 7' flammable liquid storage module (cell 7). The module is Factory Mutual approved and has four-hour fire rated walls and doors. The module has a self-contained internal dry chemical fire suppressant system. The module has a 90-gallon polyethylene coated sump. The module is lag bolted to the concrete floor in the flammable RMW storage area indicated in Figure 4-8. The module has a storage capacity of four 55-gallon drums, or up to 250 gallons of total capacity of all containers stored, whichever is greater. This storage area meets the requirements of a one year PCB storage area as defined in 40 CFR 761.65, so flammable mixed waste, also regulated as PCB waste, may be stored in this location. A diagram of this cell is provided in Figure 4-8.

Modification Class: ¹²³

Please check one of the Classes:

Class 1

Class¹

Class 2

Class 3

X

Relevant WAC 173-303-830, Appendix I Modification: A.1.

Enter wording of the modification from WAC 173-303-830, Appendix I citation:

A. General Permit Provisions:

1. Administrative and informational changes.

Submitted by Co-Operator:

Reviewed by RL Program Office:

Reviewed by Ecology:

A. K. Ikenbergy
A. K. Ikenbergy

9-22-98
Date

R.F. Christensen
R.F. Christensen

9/24/98
Date

Greta P. Davis
for J. J. Wallace

10/21/98
Date

¹Class 1 modifications requiring prior Agency approval.

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Hanford Facility RCRA Permit Modification Notification Form

Unit:
305-B Storage Facility

Permit Part & Chapter:
Part III, Chapter 2 and Attachment 18
[Section 4, Figure 4-8]

Description of Modification:

Section 4, page 4-17, Figure 4-8, lines 29-36:

LEGEND

- 1 Flammable RMW Storage Module
- 2 Removable hatch cover for basement access (surrounded by railing)
- 3 ~~Nonhazardous supplies storage~~

All PCB waste stored in Cell 9 shall be stored in trays, or drum overpacks that meet all the requirements of 40 CFR 761.65(b).

Modification Class: ¹²³

Please check one of the Classes:

Class 1	Class ¹	Class 2	Class 3
X			

Relevant WAC 173-303-830, Appendix I Modification: A.1.

Enter wording of the modification from WAC 173-303-830, Appendix I citation:

A. General Permit Provisions:

1. Administrative and informational changes.

Submitted by Co-Operator:

A. K. Ikenberry
A. K. Ikenberry

9-22-98
Date

Reviewed by RL Program Office:

R.F. Christensen
R.F. Christensen

9/24/98
Date

Reviewed by Ecology:

Greta P. Davis
for J. J. Wallace

10/21/98
Date

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Hanford Facility RCRA Permit Modification Notification Form

Unit:
305-B Storage Facility

Permit Part & Chapter:
Part III, Chapter 2 and Attachment 18
[Section 4, Figure 4-9]

Description of Modification:

Section 4, page 4-19, Figure 4-9, lines 17-35:

Cell 7 Legend

7A Poisons
 7B Oxidizers
 7C Class 9/Combustible
 7D Washington Only/Combustible
 7E Flammable Solids
 7F Corrosive Base/Combustible
 7G Corrosive Acid/Combustible
 7H Corrosive/PCB's/Combustible
 7I Corrosive Acid/PCB's/Combustible
 7J PCB's/Combustible
 7K Washington Only/Class 9/PCB's/Combustible
 7L Non-Regulated/Combustible
 7M Washington State Waste/ Class9/ Non-Regulated/ Combustible/ Compatibles

HOOD 121.9cm L x 54.2cm D x 228.6cm H

All PCB waste stored in Cell 7 will be segregated according to chemical compatibility, and stored in any of the four stainless steel container pans complying with 40 CFR 761.65(b)

Modification Class: ¹²³	Class 1	Class ¹ 1	Class 2	Class 3
Please check one of the Classes:	X			

Relevant WAC 173-303-830, Appendix I Modification: A.1.

Enter wording of the modification from WAC 173-303-830, Appendix I citation:

A. General Permit Provisions:

1. Administrative and informational changes.

Submitted by Co-Operator:	Reviewed by RL Program Office:	Reviewed by Ecology:
<i>A. K. Ikenberry</i> 9-22-98 A. K. Ikenberry Date	<i>R.F. Christensen</i> 9/30/98 R.F. Christensen Date	<i>Yates P. Davis</i> 10/1/98 for J. J. Wallace Date

¹Class 1 modifications requiring prior Agency approval.

² This is only an advanced notification of an intended Class ¹1, 2, or 3 modification, this should be followed with a formal modification request, and consequently implement the required Public Involvement processes when required.

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Hanford Facility RCRA Permit Modification Notification Form

Unit:
305-B Storage Facility

Permit Part & Chapter:
Part III, Chapter 2 and Attachment 18
[Section 4, Table 4-1]

Description of Modification:

Section 4, page 4-20 and 4-21, Table 4-1:

Replace Table 4-1, with revised Table 4-1.

Reason: Table 4-1 contained a complete version of the Uniform Building Code Limits for the 305-B Storage Unit.

Modification Class: ¹²³

Please check one of the Classes:

Class 1	Class ¹	Class 2	Class 3
X			

Relevant WAC 173-303-830, Appendix I Modification: A.1.

Enter wording of the modification from WAC 173-303-830, Appendix I citation:

A. General Permit Provisions:

1. Administrative and informational changes.

Submitted by Co-Operator:	Reviewed by RL Program Office:	Reviewed by Ecology:
<i>A. K. Ikenberry</i> A. K. Ikenberry Date	<i>R.F. Christensen</i> R.F. Christensen Date	<i>Guth P. Davis</i> <i>for J. J. Wallace</i> Date
9/22/98	9/30/98	10/21/98

¹Class 1 modifications requiring prior Agency approval.

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Hanford Facility RCRA Permit Modification Notification Form

Unit:
305-B Storage Facility

Permit Part & Chapter:
Part III, Chapter 2 and Attachment 18
[Section 6.1]

Description of Modification:

Section 6.1, page 6-1, lines 9-29:

6.1 SECURITY [F-1]

Security for 305-B is provided by a combination of the overall security system for the 300 Area, and a specific security system for the waste storage unit. The former controls access to the 300 Area proper, while the latter controls access to 305-B.

The 305-B Storage Unit is located within the Hanford 300 Area. As part of the Hanford Site, the 300 Area is subject to a restricted access and personnel security system for the protection of Government property, classified information, and special nuclear materials. The 300 Area is a controlled access area with access limited to persons authorized to enter and having appropriate security clearances or escorts.

The security program for 305-B, in addition to 300 Area access, is designed to limit building access to those personnel within the 300 Area authorized to enter the unit. Access to 305-B can be gained through five walk-in doors, and two large roll up doors which facilitate loading and unloading activities. All doors to 305-B are kept locked at all times except when in use. All requests for keys are reviewed and approved by the unit operating supervisor and the building manager, and a record of the personnel issued keys is kept in the Operating Record at all times.

Keys to the unit are issued only to unit personnel, security personnel, and emergency response personnel. Any additions to this list are approved by the unit operating supervisor, ~~the line manager,~~ and the building manager ~~and are noted in the operating record of the unit.~~

Specific aspects of the security programs for both the 300 Area and 305-B Storage Unit are described in more detail below.

Modification Class: ¹²³

Please check one of the Classes:

Class 1	Class ¹ 1	Class 2	Class 3
X			

Relevant WAC 173-303-830, Appendix I Modification: A.1.

Enter wording of the modification from WAC 173-303-830, Appendix I citation:

A. General Permit Provisions:

1. Administrative and informational changes.

Submitted by Co-Operator:

Reviewed by RL Program Office:

Reviewed by Ecology:

<i>A. K. Ikenberry</i> A. K. Ikenberry	9-22-98 Date	<i>R.F. Christensen</i> R.F. Christensen	9/30/98 Date	<i>Shel P. Davis</i> for J. J. Wallace	10/21/98 Date
---	-----------------	---	-----------------	---	------------------

¹Class 1 modifications requiring prior Agency approval.

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Hanford Facility RCRA Permit Modification Notification Form

Unit:
305-B Storage Facility

Permit Part & Chapter:
Part III, Chapter 2 and Attachment 18
[Section 6.1.1.1]

Description of Modification:

Section 6.1.1.1, page 6-3, lines 6-11:

Entry to the unit is controlled through the use of locked entrances. The 305-B Storage Unit is kept locked at all times except when in use. Physical control of keys and records of key distributions are maintained by PNNL Security. Distribution of keys to 305-B is subject to approval by ~~the manager of the waste management organization~~, the building manager, and the facility operating supervisor, and a list of those personnel in possession of keys is kept in the Operating Record for 305-B. Personnel in possession of keys have been instructed to admit only persons having official business. All visitors to the unit must be escorted by waste management organization personnel.

Modification Class: ¹²³	Class 1	Class ¹ 1	Class 2	Class 3
Please check one of the Classes:	X			

Relevant WAC 173-303-830, Appendix I Modification: A.1.

Enter wording of the modification from WAC 173-303-830, Appendix I citation:

A. General Permit Provisions:

1. Administrative and informational changes.

Submitted by Co-Operator:	Reviewed by RL Program Office:	Reviewed by Ecology:
<i>A. K. Ikenberry</i> 9-22-98	<i>R.F. Christensen</i> 9/30/98	<i>John P. Davis</i> 10/21/98
A. K. Ikenberry Date	R.F. Christensen Date	for J. J. Wallace Date

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Hanford Facility RCRA Permit Modification Notification Form

Unit:
305-B Storage Facility

Permit Part & Chapter:
Part III, Chapter 2 and Attachment 18
[Section 6.2.1.1]

Description of Modification:

Section 6.2.1.1, page 6-4, lines 1-6:

Weekly Inspections. Waste management organization personnel conduct weekly inspections of both safety and operating equipment in 305-B. Safety and emergency equipment are inspected for functionality and adequacy of supply. The weekly inspection is conducted by two personnel on the last workday of each week using the inspection Logbook and the most current version of the Weekly Inspection Checklist Form that is on file at 305-B (Fig. 6-2) and Inspection Logbook. An example of a Weekly Inspection Checklist is shown in Fig. 6-2. The Inspection Checklist and Inspection Logbook become a permanent part of the 305-B Operating Record.

Modification Class: ¹²³

Please check one of the Classes:

Class 1	Class ¹ 1	Class 2	Class 3
X			

Relevant WAC 173-303-830, Appendix I Modification: A.1.

Enter wording of the modification from WAC 173-303-830, Appendix I citation:

A. General Permit Provisions:

1. Administrative and informational changes.

Submitted by Co-Operator:	Reviewed by RL Program Office:	Reviewed by Ecology:
<i>Alice K. Ikenberry</i> 9-22-98 A. K. Ikenberry Date	<i>R.F. Christensen</i> 9/30/98 R.F. Christensen Date	<i>Shelby P. Davis</i> 10/21/98 <i>for</i> J. J. Wallace Date

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Hanford Facility RCRA Permit Modification Notification Form

Unit:
305-B Storage Facility

Permit Part & Chapter:
Part III, Chapter 2 and Attachment 18
[Section 6.2.1.1]

Description of Modification:

Section 6.2.1.1, page 6-4, lines 19-33:

Monthly Inspections. Monthly oversight inspections are conducted by the manager of the Environmental Management Services Department waste management organization or their his designee. This monthly inspection is conducted on or near the last workday of each month using the most current version of the Monthly Inspection Checklist Form. A example of a Monthly Inspection Form is shown in (Fig. 6-3). Items targeted for monthly inspection include, but are not limited to, equipment function and condition, housekeeping, chemical inventory, weekly inspections and corresponding corrective actions, safety equipment operation, spill control and cleanup supplies, and general packaging material inventory. Specific problems to be looked for with each of the items inspected are identified on the Inspection Checklist Form. An internal memorandum from the manager of the waste management organization to the Laboratory Safety Department manager reports the findings of the monthly inspections. Copies of the inspection report memorandum are provided to operations personnel and maintained in the files of the waste management organization. Any corrective action noted on the management inspection checklist or deterioration or malfunctions in equipment discovered by the inspector are delegated to responsible individuals in the operations group. Corrective actions identified in the monthly management inspection must be completed before the next inspection cycle within two weeks unless there are documentation and reason for further delay. Monthly management inspection report memos and corrective action response documentation are part of the 305-B Operating Record.

Modification Class: ¹²³

Class 1

Class¹1

Class 2

Class 3

Please check one of the Classes:

X

Relevant WAC 173-303-830, Appendix I Modification: A.1.

Enter wording of the modification from WAC 173-303-830, Appendix I citation:

A. General Permit Provisions:

1. Administrative and informational changes.

Submitted by Co-Operator:	Reviewed by RL Program Office:	Reviewed by Ecology:
<i>Alice K. Ikenberry</i> 9-22-98	<i>R.F. Christensen</i> 9/30/98	<i>Gretchen P. Davis</i> 10/21/98
A. K. Ikenberry Date	R.F. Christensen Date	for J. J. Wallace Date

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Hanford Facility RCRA Permit Modification Notification Form

Unit:
305-B Storage Facility

Permit Part & Chapter:
Part III, Chapter 2 and Attachment 18
[Section 6.2.1.1]

Description of Modification:

Section 6.2.1.1., page 6-7, lines 5-11:

PNNL facilities support staff perform additional documented inspections of the two emergency eye wash/shower units, ~~and the walk-in hood air flow, and the elephant trunk ventilators air flow.~~ The safety showers and air flow of the walk-in hood ~~and elephant trunk ventilators~~ are inspected quarterly. The emergency eyewash/safety showers are checked for proper operation, and the walk-in hood ~~and elephant trunk~~ ventilation face velocity must meet a 125-fpm minimum requirement. Records of these safety equipment inspections and their results, as well as documentation of any required corrective actions, are maintained by the preventive maintenance staff in PNNL's Facilities Management Department and Technical Services Department.

Modification Class: ¹²³

Please check one of the Classes:

Class 1	Class ¹	Class 2	Class 3
X			

Relevant WAC 173-303-830, Appendix I Modification: A.1.

Enter wording of the modification from WAC 173-303-830, Appendix I citation:

A. General Permit Provisions:

1. Administrative and informational changes.

Submitted by Co-Operator:	Reviewed by RL Program Office:	Reviewed by Ecology:
<i>A. K. Ikenberry</i> 9-22-98 A. K. Ikenberry Date	<i>R.F. Christensen</i> 9/24/98 R.F. Christensen Date	<i>Gretchen P. Davis</i> 10/21/98 for J. J. Wallace Date

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Hanford Facility RCRA Permit Modification Notification Form

Unit:
305-B Storage Facility

Permit Part & Chapter:
Part III, Chapter 2 and Attachment 18
[Section 6.2.1.2]

Description of Modification:

Section 6.2.1.2., page 6-7, lines 13-15:

6.2.1.2. Frequency of Inspections [F-2a(2)]

Inspections are conducted on a daily, weekly, monthly, quarterly, and annual basis, as described in Section 6.2.1.1.

Modification Class: ¹²³

Please check one of the Classes:

Class 1	Class ¹	Class 2	Class 3
X			

Relevant WAC 173-303-830, Appendix I Modification: A.1.

Enter wording of the modification from WAC 173-303-830, Appendix I citation:

A. General Permit Provisions:

1. Administrative and informational changes.

Submitted by Co-Operator:

A. K. Ikenberry 9-22-98
A. K. Ikenberry Date

Reviewed by RL Program Office:

R.F. Christensen 9/30/98
R.F. Christensen Date

Reviewed by Ecology:

John P. Davis 10/21/98
for J. J. Wallace Date

¹Class 1 modifications requiring prior Agency approval.

² This is only an advanced notification of an intended Class ¹1, 2, or 3 modification, this should be followed with a formal modification request, and consequently implement the required Public Involvement processes when required.

³ If the proposed modification does not match any modification listed in WAC 173-303-830 Appendix I, then the proposed modification should automatically be given a Class 3 status. This status may be maintained by the Department of Ecology, or down graded to ¹1, if appropriate.

Hanford Facility RCRA Permit Modification Notification Form

Unit:
305-B Storage Facility

Permit Part & Chapter:
Part III, Chapter 2 and Attachment 18
[Section 6.2.2.1]

Description of Modification:

Section 6.2.2.1, page 6-7, lines 42-49:

6.2.2.1 Container Inspection [F-2b(1)]

When in use, dangerous and mixed waste storage areas, as well as containers stored at 305-B are inspected daily for leakage, evidence of damage or deterioration, proper and legible labeling, and proper lid and bung closure. When work is being performed, the containment system is also checked on a daily basis for accumulation of any wastes which may have been spilled into them. Structural integrity of the containment systems is checked on a weekly basis.

Modification Class: ¹²³

Please check one of the Classes:

Class 1	Class ¹	Class 2	Class 3
X			

Relevant WAC 173-303-830, Appendix I Modification: A.1.

Enter wording of the modification from WAC 173-303-830, Appendix I citation:

A. General Permit Provisions:

1. Administrative and informational changes.

Submitted by Co-Operator:	Reviewed by RL Program Office:	Reviewed by Ecology:
<i>A. K. Ikenberry</i> A. K. Ikenberry Date	<i>R.F. Christensen</i> R.F. Christensen Date	<i>Yvette P. Davis</i> for J. J. Wallace Date
9-22-98	9/30/98	10/21/98

¹Class 1 modifications requiring prior Agency approval.

² This is only an advanced notification of an intended Class ¹1, 2, or 3 modification, this should be followed with a formal modification request, and consequently implement the required Public Involvement processes when required.

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Hanford Facility RCRA Permit Modification Notification Form

Unit:
305-B Storage Facility

Permit Part & Chapter:
Part III, Chapter 2 and Attachment 18
[Figure 6-2]

Description of Modification:

Page 6-8, Figure 6-2. Monthly Inspection Checklist:

Date/Time Inspector (Print/Sign)

...

*Corrective actions are required within the next inspection cycle two weeks.

Modification Class: ¹²³	Class 1	Class ¹ 1	Class 2	Class 3
Please check one of the Classes:	X			

Relevant WAC 173-303-830, Appendix I Modification: A.1.

Enter wording of the modification from WAC 173-303-830, Appendix I citation:

- A. General Permit Provisions:
1. Administrative and informational changes.

Submitted by Co-Operator:	Reviewed by RL Program Office:	Reviewed by Ecology:
<i>A. K. Ikenberry</i> 9-22-98	<i>R.F. Christensen</i> 9/30/98	<i>Gretchen P. Davis</i> 10/21/98
A. K. Ikenberry Date	R.F. Christensen Date	for J. J. Wallace Date

¹Class 1 modifications requiring prior Agency approval.

² This is only an advanced notification of an intended Class ¹1, 2, or 3 modification, this should be followed with a formal modification request, and consequently implement the required Public Involvement processes when required.

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Hanford Facility RCRA Permit Modification Notification Form

Unit:
305-B Storage Facility

Permit Part & Chapter:
Part III, Chapter 2 and Attachment 18
[Section 6.3.1.1]

Description of Modification:

Section 6.3.1.1, Page 6-10, lines 14-18:

The telephone system is to be used to provide verbal emergency instructions to 305-B staff. The telephone can also be used to verbally transmit emergency data to non-305-B staff, and to request emergency services. A network of telephones covers both floors of the facility. Locations of telephones are shown in Figure 6-4. In addition to the telephone communication system at 305-B, operation personal have access to the hand held radios, as well as one in each vehicle assigned to the facility.

Modification Class: ¹²³

Please check one of the Classes:

Class 1	Class ¹	Class 2	Class 3
X			

Relevant WAC 173-303-830, Appendix I Modification: A.1.

Enter wording of the modification from WAC 173-303-830, Appendix I citation:

A. General Permit Provisions:

1. Administrative and informational changes.

Submitted by Co-Operator:	Reviewed by RL Program Office:	Reviewed by Ecology:
<i>A. K. Ikenberry</i> 9/22/98 A. K. Ikenberry Date	<i>R.F. Christensen</i> 9/30/98 R.F. Christensen Date	<i>J. J. Wallace</i> 10/21/98 J. J. Wallace Date

¹Class 1 modifications requiring prior Agency approval.

²This is only an advanced notification of an intended Class ¹1, 2, or 3 modification, this should be followed with a formal modification request, and consequently implement the required Public Involvement processes when required.

³If the proposed modification does not match any modification listed in WAC 173-303-830 Appendix I, then the proposed modification should automatically be given a Class 3 status. This status may be maintained by the Department of Ecology, or down graded to ¹1, if appropriate.

Hanford Facility RCRA Permit Modification Notification Form

Unit:
305-B Storage Facility

Permit Part & Chapter:
Part III, Chapter 2 and Attachment 18
[Section 6.3.1.2]

Description of Modification:

Section 6.3.1.2., page 6-10, lines 20-26:

6.3.1.2 External Communications [F-3a(2)]

As mentioned in Section 6.3.1.1 above, both a fire alarm system and telephone network system are in place at 305-B. Both systems can be used to summon emergency assistance. The fire alarm system summons direct response from the Hanford Fire Department's 300 Area Station. The telephone system can be used to access Hanford's Emergency Network directly at 375-2400 or by dialing the emergency number, 8911. Locations of fire alarm pull boxes and telephones are given in Figure 6-4.

Modification Class: ¹²³	Class 1	Class ¹ 1	Class 2	Class 3
Please check one of the Classes:	X			

Relevant WAC 173-303-830, Appendix I Modification: A.1.

Enter wording of the modification from WAC 173-303-830, Appendix I citation:

- A. General Permit Provisions:
1. Administrative and informational changes.

Submitted by Co-Operator:	Reviewed by RL Program Office:	Reviewed by Ecology:
<i>A. K. Ikenberry</i> 9-22-98	<i>R.F. Christensen</i> 9/30/98	<i>Yule P. Davis</i> 10/21/98
A. K. Ikenberry Date	R.F. Christensen Date	for J. J. Wallace Date

¹Class 1 modifications requiring prior Agency approval.

² This is only an advanced notification of an intended Class ¹1, 2, or 3 modification, this should be followed with a formal modification request, and consequently implement the required Public Involvement processes when required.

³ If the proposed modification does not match any modification listed in WAC 173-303-830 Appendix I, then the proposed modification should automatically be given a Class 3 status. This status may be maintained by the Department of Ecology, or down graded to ¹1, if appropriate.

Hanford Facility RCRA Permit Modification Notification Form

Unit:
305-B Storage Facility

Permit Part & Chapter:
Part III, Chapter 2 and Attachment 18
[Table 6-2]

Description of Modification:

Table 6-2, Page 6-13:

Table 6-2. Material and Equipment for Spill Containment and Cleanup:

Absorbent Pillows or
Booms

Three cartons, each
containing booms or
12 pillows

To be used for diking or
damming and absorption
of spilled materials

Each boom or pillow can
absorb slightly more than
1 L of liquid.

Modification Class: ¹²³

Please check one of the Classes:

Class 1	Class ¹	Class 2	Class 3
X			

Relevant WAC 173-303-830, Appendix I Modification: A.1.

Enter wording of the modification from WAC 173-303-830, Appendix I citation:

A. General Permit Provisions:

1. Administrative and informational changes.

Submitted by Co-Operator:

A. K. Ikenberry 9-22-98
A. K. Ikenberry Date

Reviewed by RL Program Office:

R.F. Christensen 9/30/98
R.F. Christensen Date

Reviewed by Ecology:

Greta P. Davis 10/21/98
for J. J. Wallace Date

¹Class 1 modifications requiring prior Agency approval.

² This is only an advanced notification of an intended Class ¹, 2, or 3 modification, this should be followed with a formal modification request, and consequently implement the required Public Involvement processes when required.

³ If the proposed modification does not match any modification listed in WAC 173-303-830 Appendix I, then the proposed modification should automatically be given a Class 3 status. This status may be maintained by the Department of Ecology, or down graded to ¹1, if appropriate.

Hanford Facility RCRA Permit Modification Notification Form

Unit:
305-B Storage Facility

Permit Part & Chapter:
Part III, Chapter 2 and Attachment 18
[Section 6.4.5]

Description of Modification:

Section 6.4.5, page 6-14, lines 1-23:

6.4.5. Personnel Protection Equipment [F-4e]

Protective clothing and equipment are provided to employees during normal and emergency operations. During routine operations, the maximum number of employees working in the 305-B unit is less than fifteen ten. For dry chemical handling activities, such as labpacking, the minimum protection requirement is eye protection (safety glasses with side shields or chemical goggles), lab coat, and chemical resistant gloves (plastic or other construction as appropriate). Protection levels for other operations, such as bulking, and emergency situations are determined in consultation with a PNNL industrial hygienist, and staffing levels are revised according to the availability of proper protective equipment as shown below. Protective clothing and equipment available in the 305-B Storage Unit includes:

- ◆ 6 sets of chemically resistant suits, aprons, boots, and gloves
- ◆ 20 pairs of extra protective eyeglasses
- ◆ 3 SCBA
- ◆ 5 pairs of chemical goggles
- ◆ 4 face shields
- ◆ 4 full-face respirators with appropriate cartridges.

This protective equipment is stored in cabinets located outside of the operating area east entrance and is well stocked at all times. The location of the storage cabinets is given in Figure 6-4. This equipment is periodically replaced as it is used. The above inventory reflects the quantities of each type of PPE that are typically present at 305-B. Minimum quantities required to be present are given in the weekly inspection checklist, Figure 6-2.

Modification Class: ¹²³	Class 1	Class ¹ 1	Class 2	Class 3
Please check one of the Classes:	X			

Relevant WAC 173-303-830, Appendix I Modification: A.1.

Enter wording of the modification from WAC 173-303-830, Appendix I citation:

- A. General Permit Provisions:
1. Administrative and informational changes.

Submitted by Co-Operator:	Reviewed by RL Program Office:	Reviewed by Ecology:
<i>A. K. Ikenberry</i> 9-22-98 A. K. Ikenberry Date	<i>R.F. Christensen</i> 9/30/98 R.F. Christensen Date	<i>Greta P. Davis</i> 10/21/98 for J. J. Wallace Date

¹Class 1 modifications requiring prior Agency approval.

² This is only an advanced notification of an intended Class ¹1, 2, or 3 modification, this should be followed with a formal modification request, and consequently implement the required Public Involvement processes when required.

³ If the proposed modification does not match any modification listed in WAC 173-303-830 Appendix I, then the proposed modification should automatically be given a Class 3 status. This status may be maintained by the Department of Ecology, or down graded to ¹1, if appropriate.

Hanford Facility RCRA Permit Modification Notification Form

Unit:
305-B Storage Facility

Permit Part & Chapter:
Part III, Chapter 2 and Attachment 18
[Section 6.5.1]

Description of Modification:

Section 6.5.1, page 6-14, lines 30-53; and page 6-15, lines 1-6:

6.5.1. Precautions to Prevent Ignition or Reaction of Ignitable or Reactive Waste [F-5a]

305-B may be used to store a variety of ignitable wastes. Precautions to prevent ignition of ignitable wastes involve separation of wastes from sources of ignition and use of procedures which minimize the potential for accidental ignition. There are no routine sources of ignition or open flame in 305-B. Work with ignition or heat sources, if required, is limited and controlled by PNNL management and is performed in compliance with internal PNNL health and safety procedures for elimination of ignition sources. These internal procedures:

- Prohibit use of open flame equipment when working with flammable liquids
- Prohibit smoking around flammable liquids [No smoking is allowed at 305-B]
- Require electrical equipment used in flammable or explosive atmospheres to comply with the National Electrical Code, NFPA 70
- Require use of equipment with automatic, adjustable temperature controls and high-temperature limit switches to prevent overheating
- Prohibit placement of flammable liquids on hot surfaces
- Require all static electricity sources to be grounded in areas where ignitable vapors may be present
- Require bonding of conductive containers when transferring flammable liquids.
- Require use of non-sparking tools in flammable waste storage areas

All maintenance or modifications that require work with ignition sources must receive prior approval by a PNNL Safety Engineer. ~~This approval is documented in the Operating Record.~~ Smoking is not allowed in 305-B at any time and the interior and exterior of the facility are clearly posted with "No Smoking" signs. Waste storage areas are not heated by any radiant heat source. All tools used to open ignitable waste containers are constructed of nonsparking materials.

Ignitable waste storage areas are inspected annually by a PNNL fire safety engineer familiar with the Uniform Fire Code. This inspection is documented in the Operating Record. There are also storage restrictions at 305-B for combustible wastes as part of fire safety requirements. The storage restrictions defined in the Uniform Building Code for Class B Occupancy apply to 305-B (International Conference of Building Officials 1988). ~~These restrictions are given in Table 4-1.~~ The weekly inspection for 305-B includes checking to see if the inventory of combustibles is below these limits. These inspections are documented in the Operating Record.

Modification Class: ¹²³

Please check one of the Classes:

Class 1	Class ¹ 1	Class 2	Class 3
X			

Relevant WAC 173-303-830, Appendix I Modification: A.1.

Enter wording of the modification from WAC 173-303-830, Appendix I citation:

A. General Permit Provisions:

1. Administrative and informational changes.

Submitted by Co-Operator:	Reviewed by RL Program Office:	Reviewed by Ecology:
<i>A.K. Ikenbergy</i> 9-22-98 A. K. Ikenbergy Date	<i>R.F. Christensen</i> 9/30/98 R.F. Christensen Date	<i>Chet P. Davis</i> 10/21/98 <i>J.J. Wallace</i> J. J. Wallace Date

¹Class 1 modifications requiring prior Agency approval.

²This is only an advanced notification of an intended Class ¹1, 2, or 3 modification, this should be followed with a formal modification request, and consequently implement the required Public Involvement processes when required.

³If the proposed modification does not match any modification listed in WAC 173-303-830 Appendix I, then the proposed modification should automatically be given a Class 3 status. This status may be maintained by the Department of Ecology, or down graded to ¹1, if appropriate.

Hanford Facility RCRA Permit Modification Notification Form

Unit:
305-B Storage Facility

Permit Part & Chapter:
Part III, Chapter 2 and Attachment 18
[Section 6.5.2]

Description of Modification:

Section 6.5.2, page 6-15, lines 8-24:

6.5.2 General Precautions for Handling Ignitable or Reactive Waste and Mixing of Incompatible Waste [F-5b]

As described in Section 6.5.1, ignitable wastes are managed in a manner which protects the wastes from sources of ignition or open flame. Ignitable waste containers are maintained in good condition and inspected weekly to minimize the potential for releases which could result in fire. Containers of ignitable waste are protected from high temperature to prevent the potential for pressurization and buildup of ignitable vapors. Containers of ignitable waste are stored in flammable material storage cabinets within waste storage cells, as described in Section 4.1.1.6. Limitations on sizes of containers and amounts of storage in cabinets are found in Section 4.3.1.

Because of the wide variety of wastes which may be accepted at 305-B, the potential exists for storage of incompatible wastes. Mixing of incompatible wastes is prevented through waste segregation and storage procedures. Chemical wastes stored in 305-B are separated by compatibility and hazard class and stored in separate storage cells. Separate storage shelves and cabinets are used within the storage cells, as described in Section 4.1.1.6, to provide further waste segregation. ~~Prior to accepting unfamiliar wastes from generators, waste management organization staff determine the Reactivity Group Number as per *A Method for Determining the Compatibility of Hazardous Wastes* (EPA 1980) for each waste so that wastes may be stored with compatible materials.~~ The following general guidance is used to segregate and separate chemicals:

Modification Class: ¹²³

Please check one of the Classes:

Class 1	Class ¹	Class 2	Class 3
X			

Relevant WAC 173-303-830, Appendix I Modification: A.1.

Enter wording of the modification from WAC 173-303-830, Appendix I citation:

A. General Permit Provisions:

1. Administrative and informational changes.

Submitted by Co-Operator:	Reviewed by RL Program Office:	Reviewed by Ecology:
<i>A. K. Ikenberry</i> 9-27-98 A. K. Ikenberry Date	<i>R.F. Christensen</i> 9/30/98 R.F. Christensen Date	<i>Cheto P. Davis</i> 10/21/98 for J. J. Wallace Date

¹Class 1 modifications requiring prior Agency approval.

² This is only an advanced notification of an intended Class ¹, 2, or 3 modification, this should be followed with a formal modification request, and consequently implement the required Public Involvement processes when required.

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Hanford Facility RCRA Permit Modification Notification Form

Unit:
305-B Storage Facility

Permit Part & Chapter:
Part III, Chapter 2 and Attachment 18
[Section 8.1.1]]

Description of Modification:

Section 8.1.1., page 8-1, lines 21-45:

8.1.1. Job Titles and Job Descriptions [H-1a]

The Unit Operating Supervisor is responsible for the daily operation of 305-B in compliance with regulations administered under RCRA, the State of Washington Dangerous Waste Regulations (WAC 173-303), and PNNL waste operating procedures.

The Unit Operating Supervisor is ultimately responsible for assessing 305-B compliance, conducting inspections and overseeing any corrective actions which may result from them, ensuring waste handling and storing procedures are followed, and serving as BED to implement proper emergency procedures when necessary. In addition to the responsibilities mentioned above, it is the role of the Unit Operating Supervisor to direct new employees so that successful completion of introductory and on-the-job training will be accomplished in the first six months of employment.

The RMW Waste Management ~~staff~~Engineer is responsible for the mixed waste operation of 305-B. This staff member must review all mixed waste disposal requests and ensure their accuracy and reliability. In addition, the RMW Waste Management ~~staff~~Engineer will dispatch a pickup team and oversee mixed waste pickup and transportation to the 305-B Storage Unit. When adequate volumes of mixed waste have accumulated to warrant disposal of the waste, the RMW Waste Management ~~staff~~Engineer ~~are~~ is responsible for readying the waste for shipment. These duties include packaging, labeling, manifesting, and recordkeeping.

The Waste Management Engineers are responsible for evaluating unit compliance, managing the PNNL PCB waste stream, managing the waste designation data base, and overseeing waste designations. Waste Management Engineers also perform waste management operations such as pickup and lab packing of small containers. They also oversee offsite shipping of wastes and ensure compliance with DOT regulations.

Modification Class: ^{12 3}

Class 1

Class¹

Class 2

Class 3

Please check one of the Classes:

X

Relevant WAC 173-303-830, Appendix I Modification: B.5.b.

Enter wording of the modification from WAC 173-303-830, Appendix I citation:

B. General Facility Standards:

5. Changes in the training plan:

b. Other changes that update the current job titles and responsibilities of facility staff:

Submitted by Co-Operator:

Reviewed by RL Program Office:

Reviewed by Ecology:

Alice K. Ikenberry
A. K. Ikenberry

9-22-98
Date

R.F. Christensen
R.F. Christensen

9/24/98
Date

Gretchen P. Davis
for J. J. Wallace

10/21/98
Date

¹Class 1 modifications requiring prior Agency approval.

² This is only an advanced notification of an intended Class ¹, 2, or 3 modification, this should be followed with a formal modification request, and consequently implement the required Public Involvement processes when required.

³ If the proposed modification does not match any modification listed in WAC 173-303-830 Appendix I, then the proposed modification should automatically be given a Class 3 status. This status may be maintained by the Department of Ecology, or down graded to ¹, if appropriate.

Hanford Facility RCRA Permit Modification Notification Form				
Unit: 305-B Storage Facility	Permit Part & Chapter: Part III, Chapter 2 and Attachment 18 [Figure 8-1]			
<u>Description of Modification:</u>				
Figure 8-1, page 8-2, Footnote:				
Staff Position Key: OS Unit Operations Supervisor E RMW and Waste Management Engineers TS Waste Management Technicians and Scientist/Engineering Associates Technical Specialists C Waste Management Clerks				
² Requirements Key: A Annually; B Biennially; T Triennially; I Initially upon assignment to the unit; N Not Required.				
³ Required for female staff only. This information is given in the various radiation safety classes and is not a separate stand alone class.				
⁴ Successful completion of this course meets the requirements of the Hazardous Waste Shipment Certification course. Required for RMW Engineers and any TS that has the assigned duty of signing for onsite radioactive shipments.				
⁵ Required for any TS that has the assigned duty of making waste designations.				
Modification Class: ¹²³	Class 1	Class ¹ 1	Class 2	Class 3
Please check one of the Classes:	X			
Relevant WAC 173-303-830, Appendix I Modification: B.5.b				
<u>Enter wording of the modification from WAC 173-303-830, Appendix I citation:</u>				
B General Facility Standards:				
5. Changes in the training plan:				
b. Other changes to reflect current job descriptions and regulatory changes:				
Submitted by Co-Operator: Reviewed by RL Program Office: Reviewed by Ecology:				
<i>Arie K. Ikenberry</i> 9-22-98	<i>R.F. Christensen</i> 9/30/98	<i>Gretchen P. Davis</i> 10/21/98		
A. K. Ikenberry Date	R.F. Christensen Date	for J. J. Wallace Date		

¹Class 1 modifications requiring prior Agency approval.

² This is only an advanced notification of an intended Class ¹1, 2, or 3 modification, this should be followed with a formal modification request, and consequently implement the required Public Involvement processes when required.

³ If the proposed modification does not match any modification listed in WAC 173-303-830 Appendix I, then the proposed modification should automatically be given a Class 3 status. This status may be maintained by the Department of Ecology, or down graded to ¹1, if appropriate.

Hanford Facility RCRA Permit Modification Notification Form

Unit:
305-B Storage Facility

Permit Part & Chapter:
Part III, Chapter 2 and Attachment 18
[Section 8.1.3]

Description of Modification:

Section 8.1.3, page 8-3, lines 43-48; and page 8-4, lines 1-2:

8.1.3. Training Coordinator [H-1c]

Training at PNNL is provided by a number of specialists in their fields, including a Training Coordinator from the waste management organization who is responsible for coordinating dangerous waste training. The position of Training Coordinator is filled by ~~facility staff members an engineer or specialist~~ having "hands-on" experience with handling chemical wastes. PNNL also has a unit which tracks and monitors training for PNNL employees. This coordination includes a system for "flagging" affected employees when additional training and/or follow-up is warranted.

Modification Class: ¹²³

Please check one of the Classes:

Class 1	Class ¹	Class 2	Class 3
X			

Relevant WAC 173-303-830, Appendix I Modification: B.5.b

Enter wording of the modification from WAC 173-303-830, Appendix I citation:

C. General Facility Standards:

5. Changes to the training plan:

b. Other changes that reflect current job titles and job descriptions:

Submitted by Co-Operator:	Reviewed by RL Program Office:	Reviewed by Ecology:
<i>Alice K. Ikenberry</i> <i>9-22-98</i> A. K. Ikenberry Date	<i>R.F. Christensen</i> <i>9/30/98</i> R.F. Christensen Date	<i>Gerald P. Davis</i> <i>10/21/98</i> <i>for</i> J. J. Wallace Date

¹Class 1 modifications requiring prior Agency approval.

² This is only an advanced notification of an intended Class ¹, 2, or 3 modification, this should be followed with a formal modification request, and consequently implement the required Public Involvement processes when required.

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Hanford Facility RCRA Permit Modification Notification Form

Unit:
305-B Storage Facility

Permit Part & Chapter:
Part III, Chapter 2 and Attachment 18
[Section 8.1.4.]

Description of Modification:

Section 8.1.4., page 8-4, lines 18-20:

- Vehicle Accident Prevention — Initial (2 hours) and triennial refresher (30 minutes): This course is intended to familiarize employees with safe driving rules and with the requirements for operation of government-owned and PNNL-owned vehicles.

Modification Class: ^{12 3}

Please check one of the Classes:

Class 1

Class¹

Class 2

Class 3

X

Relevant WAC 173-303-830, Appendix I Modification: B.5.b

Enter wording of the modification from WAC 173-303-830, Appendix I citation:

B. General facility Standards:

5. Changes in the training plan:

b. Other changes that reflect current training requirements:

Submitted by Co-Operator:

Reviewed by RL Program Office:

Reviewed by Ecology:

A. K. Ikenberry
A. K. Ikenberry

9-22-98
Date

R.F. Christensen
R.F. Christensen

9/30/98
Date

Shelley P. Davis
for J. J. Wallace

9/21/98
Date

¹Class 1 modifications requiring prior Agency approval.

² This is only an advanced notification of an intended Class ¹1, 2, or 3 modification, this should be followed with a formal modification request, and consequently implement the required Public Involvement processes when required.

³ If the proposed modification does not match any modification listed in WAC 173-303-830 Appendix I, then the proposed modification should automatically be given a Class 3 status. This status may be maintained by the Department of Ecology, or down graded to ¹1, if appropriate.

Hanford Facility RCRA Permit Modification Notification Form

Unit:
305-B Storage Facility

Permit Part & Chapter:
Part III, Chapter 2 and Attachment 18
[Section 8.1.4]

Description of Modification:

Section 8.1.4, page 8-4, lines 43-45:

- Radioactive Material Shipping Representative — ~~Triennial~~Biennial: This course provides training in the onsite radioactive material shipping procedures and requirements. Successful completion of this course is required to receive authorization to sign for onsite radioactive shipments (onsite RSRs). ~~The course content of this training also provides the training information provided in the Hazardous Waste Shipment Certification course. Therefore, successful completion of this course meets the training requirements of the Hazardous Waste Shipment Course.~~

Modification Class: ¹²³

Please check one of the Classes:

Class 1	Class ¹	Class 2	Class 3
X			

Relevant WAC 173-303-830, Appendix I Modification: B.5.b.

Enter wording of the modification from WAC 173-303-830, Appendix I citation:

B. General Facility Standards:

5. Changes in the training plan:

b. Other changes that reflect current regulatory requirements for DOT certification:

Submitted by Co-Operator:

Reviewed by RL Program Office:

Reviewed by Ecology:

A. K. Ikenberry
A. K. Ikenberry

9-22-98
Date

R.F. Christensen
R.F. Christensen

9/30/98
Date

John P. Davis
J. J. Wallace

10/21/98
Date

¹Class 1 modifications requiring prior Agency approval.

² This is only an advanced notification of an intended Class ¹1, 2, or 3 modification, this should be followed with a formal modification request, and consequently implement the required Public Involvement processes when required.

³ If the proposed modification does not match any modification listed in WAC 173-303-830 Appendix I, then the proposed modification should automatically be given a Class 3 status. This status may be maintained by the Department of Ecology, or down graded to ¹1, if appropriate.

Hanford Facility RCRA Permit Modification Notification Form

Unit:
305-B Storage Facility

Permit Part & Chapter:
Part III, Chapter 2 and Attachment 18
[Section 8.1.5]]

Description of Modification:

Section 8.1.5, page 8-6, lines 8-11:

- SCBA: conducted annually, this course instructs the employee of the advantages and limitations of the SCBA equipment. Key items covered in the course content of this training also provides the training information provided in the Hazardous Waste Shipment Certification course. Therefore, successful completion of this course meets the training requirements of the Hazardous Waste Shipment Course. will include equipment inspection, modes of operation, donning procedures, recognition and response to malfunctions, maintenance and repair, and practical demonstrations.

Modification Class: ¹²³

Please check one of the Classes:

Class 1	Class ¹	Class 2	Class 3
X			

Relevant WAC 173-303-830, Appendix I Modification: B.5.b.

Enter wording of the modification from WAC 173-303-830, Appendix I citation:

B. General Facility Standards:

5. Changes to the training plan.

b. Other changes that reflect accurate course content.

Submitted by Co-Operator:	Reviewed by RL Program Office:	Reviewed by Ecology:
<i>A. K. Ikenberry</i> A. K. Ikenberry Date	<i>R.F. Christensen</i> R.F. Christensen Date	<i>G. P. Davis</i> for J. J. Wallace Date
9-22-98	9/30/98	10/21/98

¹Class 1 modifications requiring prior Agency approval.

² This is only an advanced notification of an intended Class ¹1, 2, or 3 modification, this should be followed with a formal modification request, and consequently implement the required Public Involvement processes when required.

³ If the proposed modification does not match any modification listed in WAC 173-303-830 Appendix I, then the proposed modification should automatically be given a Class 3 status. This status may be maintained by the Department of Ecology, or down graded to ¹1, if appropriate.

Hanford Facility RCRA Permit Modification Notification Form

Unit: 300 Area Process Trenches	Permit Part & Chapter: Part VI, Chapter 1 [Section 8.0 of Attachment 31]
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Description of Modification:

Deletion of obsolete requirements throughout Section 8.0, "Postclosure Plan" of Attachment 31 (*300 Area Process Trenches Modified Closure/Postclosure Plan*, DOE/RL-93-73, Rev. 1): The 300 Area Process Trenches achieved clean closure of the soil column. Therefore, no postclosure care requirements pertain to it. The current postclosure plan contained in Section 8.0 contains information on postclosure requirements for soil column contamination, such as inspections, maintenance, and security measures. It is requested that the information on soil column postclosure actions be deleted from the text of Section 8.0 to reflect clean closure. This section will continue to reflect postclosure care requirements due to groundwater contamination. Attachment 1 of this notification form contains a strikeout version of Section 8.0 that reflects these changes. Attachment 2 contains a clean copy of Section 8.0 with the text to be deleted removed. These changes will also cause Permit Condition VI.1.B.p to be obsolete because they pertain to security control associated with contaminated soil rather than groundwater.

Attachment 1 and 2 also reflect typo/administrative/information changes made through a class 1 modification.

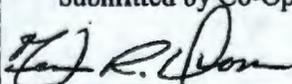
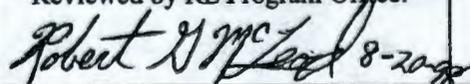
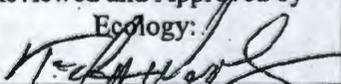
Because closure has been completed and certified, Sections 1.0 through 7.0 and all Appendices of Attachment 31 should be deleted. These sections pertain to requirements that were applicable during closure of the 300 Area Process Trenches. This will prompt two changes in Part VI, Chapter 1 of the Permit. In VI.1.A, the following should be placed at the end of the paragraph: "The 300 Area Process Trenches achieved closure in May 1998 in accordance with the closure plan contained in Attachment 31 and Permit Conditions contained in this Chapter. Therefore, enforceable portions of the plan currently consist of those associated with postclosure care. These portions are Sections 8.2, 8.4, and 8.5." Also, various Permit Conditions are now obsolete. In VI.1.B, the following should be placed before the listing of Permit Conditions: "Closure activities were completed at the 300 Area Process Trenches in May 1998. Therefore, the only Permit Conditions currently applicable to this unit during postclosure care are VI.1.B.b, VI.1.B.i, VI.1.B.q, and VI.1.B.r.

Modification Class: ¹	Class 1	Class ¹ 1	Class 2	Class 3
please check one of the Classes:				X

Relevant WAC 173-303-830, Appendix I Modification: Not explicitly listed.

Enter wording of the modification from WAC 173-303-830, Appendix I citation:

Not explicitly listed. A formal request to down grade this change to a Class ¹ 1 modification is requested by way of this notification.

Submitted by Co-Operator: 	Reviewed by RL Program Office: 	Reviewed and Approved by Ecology: 
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7/22/98

¹If the proposed modification does not match any modification listed in WAC 173-303-830 Appendix I, then the proposed modification should automatically be given a Class 3 status. This status may be maintained by the Department of Ecology, or down graded to ¹1, if appropriate.

Hanford Facility RCRA Permit Modification Notification Form

Unit:
300 Area Process Trenches

Permit Part & Chapter:
Part VI, Chapter 1 [Section 8.0 of Attachment 31]

Description of Modification:

The following changes represent administrative/informational changes to Attachment 31:

Page 8-3, Section 8.2.2, 2nd paragraph, last sentence: well inspection forms are used instead of a log book. The last sentence is revised to read as follows: "Problems and/or damage will be noted on the well inspection forms for tracking of repairs."

Page 8-4, Section 8.4, 2nd to last sentence: well inspection forms are used instead of a log book. The last sentence is revised to read as follows: "The maintenance plan is based on observations made and recorded in the well inspection forms during site inspections."

Page 8-4, Section 8.4.1, 1st sentence: well inspection forms are used instead of a log book. The 1st sentence is revised to read as follows: "...and/or problems noted in the well inspection forms during inspections..."

Page 8-4, Section 8.4.1, last sentence: well inspection forms are used instead of a log book. The last sentence is revised to read as follows: "Repairs to the four steel guard posts at each monitoring well will be made before the following inspection period and tracked on well inspection forms to completion."

Page 8-7, Section 8.5.5, first paragraph: delete "40 hours of" from the last sentence. Hazardous waste site operation training as provided by 29 CFR 1910.120 is not a 40 hour course. A similar change was made previously during closure activities in Section 7.7 through downgrading of a Class 3 to a Class 1 modification (approved by T.A. Wooley on May 13, 1998).

Page 8-7, Section 8.5.5, second bullet: delete "and the 200 East Area emergency control director by radio." This change reflects current emergency response to fires which is to notify the Hanford Fire Department only.

Page 8-8, Section 8.7: The telephone number listed is obsolete and has been deleted.

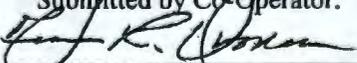
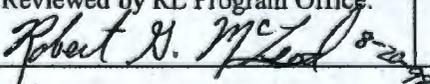
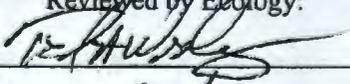
Page 8-9, Section 8.8, 2nd sentence: delete "closure plan" and replace with "postclosure plan".

Modification Class:	Class 1	Class 1	Class 2	Class 3
please check one of the Classes:	X			

Relevant WAC 173-303-830, Appendix I Modification: A.1.

Enter wording of the modification from WAC 173-303-830, Appendix I citation:

Administrative and informational changes

Submitted by Co-Operator: 	Reviewed by RL Program Office: 	Reviewed by Ecology: 
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7/22/98

Hanford Facility RCRA Permit Modification Notification Form

Unit:
300 Area Process Trenches

Permit Part & Chapter:
Part VI, Chapter 1 [Section 8.0 of Attachment 31]

Description of Modification:

Typographical errors in Section 8.0 of Attachment 31 have been corrected as follows:

Page 8-7, Section 8.5.6: Section 8.4.1 is incorrect. The correct section is 8.5.1.

Page 8-9, Section 8.8: The last sentence contains a typographical error on the figure number which should be Figure 7-4.

The following is an "other change" to the training plan of Attachment 31:

Page 8-7, Section 8.5.4, Training Director: delete this section as there are various organizations/individuals that are responsible for directing various aspects of training, depending on site contractor and type of training. This level of detail is not necessary in this plan. To eliminate the need to keep updating the section as organizations change, this section has been deleted.

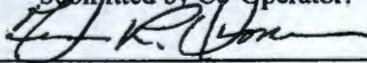
Modification Class:	Class 1	Class 1	Class 2	Class 3
please check one of the Classes:	X			

Relevant WAC 173-303-830, Appendix I Modification: A.2.

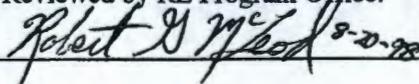
Enter wording of the modification from WAC 173-303-830, Appendix I citation:

Correction of typographical errors. Changes in the training plan; other changes.

Submitted by Co-Operator:



Reviewed by RL Program Office:



Reviewed by Ecology:

