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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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March 15, 1999

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

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

Mr. Michael C. Hughes
Bechtel Hanford, Inc.
P.O. Box 969, MSIN: H0-09
Richland, WA 99352

Mr. 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: Quarterly Notification of Class 1 Modifications to the Hanford Facility Resource Conservation and Recovery Act (RCRA) Permit, Dangerous Waste Portion (Quarter Ending 12/31/98 -Condition I C.3.)

The Washington State Department of Ecology (Ecology) has reviewed the above referenced quarterly Class 1 modifications. Enclosed are the Modification Notification Forms indicating which modifications Ecology has approved and which modifications Ecology has not approved. Modifications for this quarter included updating information in Part III of the Hanford Site Wide Permit. The Part III Class 1 modifications are associated with the RCRA Permits for the Plutonium Uranium Extraction Facility Storage Tunnels, 305-B Storage Facility, and the 325 Hazardous Waste Treatment Units.

Messrs. Rasmussen, Adair, Hughes, and Watkins

March 15, 1999

Page 2

Enclosure 1 consists of Class 1 modifications that Ecology has not approved at this time. Please contact Mr. Alex Stone, 300 Area Project Manager, to clarify and resolve these outstanding proposed modifications. Enclosure 2 consists of Class 1 modifications that Ecology has approved.

If you have any questions or comments regarding this letter, please contact me at (509) 736-5715.

Sincerely,



Laura Ruud, Permit Specialist
Nuclear Waste Program

LR:sb

Enclosures

cc w/encl.: Ellen Mattlin, USDOE
Suzette Thompson, FDH
Gary Robinson, BHI
Alice Ikenberry, PNNL
Harold Tilden, PNNL
J.R. Wilkinson, CTUIR
Donna Powaukee, NPT
Russell Jim, YIN
Adminstrative Record: Site Wide Permit

cc w/o encl.: Doug Sherwood, EPA
Cliff Clark, USDOE
Sue Price, FDH
Mary Lou Blazek, OOE

Modifications that Ecology will not Approve at this Time as Class I Modifications

325 Hazardous Waste Treatment Unit:

- Pages 2 of 59: Section 4.1.1.1, page 4-1, lines 29-32
- Page 3 of 59: Section 4.1.2.2, page 4-3, lines 28-32
- Page 9 of 59: Section 4.1.7.2, pages 4-9, lines 1-22
- Page 10 of 59: Section 4.2, page 4-12, lines 24-36
- Page 19 of 59: Section 6.1.1.2, pages 6-1, lines 13-28
- Page 21 of 59: Section 6.2.1.2, page 6-4, lines 15-17
- Page 22 of 59: Section 6.2.3, page 6-6, lines 13-21
- Page 26 of 59: Section 6.4.1, page 6-10, lines 22-33
- Page 27 of 59: Section 6.4.2, page 6-11, lines 10-28
- Page 28 of 59: Section 6.4.5, page 6-12, lines 12-21
- Page 34 of 59: APP-3A, Section 1.2.4, page 1-12, lines 24-41
- Page 36 of 59: APP-3A, Section 2.2, page 2-3, lines 20-35
- Page 37 of 59: APP-3A, Section 3.0, page 3-1, lines 20-26
- Page 38 of 59: APP-3A, Section 4.0, page 4-3, lines 1-4
- Page 39 of 59: APP-3A, Section 4.0, page 4-3, lines 17-29
- Page 40 of 59: APP-3A, Section 4.0, pages 4-3 & 4-4, lines 30-7
- Page 41 of 59: APP-3A, Section 4.0, page 4-4, lines 8-23
- Page 43 of 59: APP-3A, Section 4.4.1, page 4-5 & 4-6, lines 32-11
- Page 45 of 59: APP-3A, Section 6.0, page 6-1, lines 1-16
- Page 46 of 59: APP-3A, Section 6.0, page 6-1, lines 19-36
- Page 48 of 59: APP-3A, Section 7.0, page 7-1, lines 2-17
- Page 49 of 59: APP-8A, Section 8.1.1.1, page 8A-2, lines 22-28
- Page 50 of 59: APP-8A, Section 8.1.1.2, page 8A-3, lines 4-15
- Page 51 of 59: APP-8A, Section 8.1.1.2, page 8A-3, lines 23-29
- Page 54 of 59: APP-8A, Section 8.1.4, pages 8A-4 & 8A-5, lines 34-8
- Page 55 of 59: APP-8A, Section 8.1.4, page 8A-6, lines 1-3
- Page 56 of 59: APP-8A, Section 8.1.5.1, page 8A-6, lines 12-31
- Page 57 of 59: APP-8A, Section 8.1.5.6, page 8A-7, lines 17-22
- Page 58 of 59: APP-8A, Table 1, pages 8A-8
- Page 59 of 59: APP-8A, Table 1, pages 8A-9

Enclosure 1

Unapproved Quarterly Class 1 Modifications

Hanford Facility RCRA Permit Modification Notification Form

Unit:
325 Hazardous Waste Treatment Unit

Permit Part & Chapter:
Part III, Chapter 6 and Attachment 36
[Section 4]

Description of Modification:

Section 4.1.1.1, page 4-1, lines 29-32

4.1.1.1 Containers Located in the Hazardous Waste Treatment Unit

All flammable liquid waste is stored in compatible containers and in Underwriter's Laboratory (UL)-listed and Factory Mutual (FM)-approved flammable storage cabinets or DOT shipping containers. Solid chemicals are stored on shelving in specifically designated areas based on the hazard classification.

Modification Class: ¹²³	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:

- 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> 12-11-98	<i>R.F. Christensen</i> 1/5/99	<i>A. E. Stone</i>
A. K. Ikenbergy Date	R.F. Christensen Date	A. E. Stone Date

not approved

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: 325 Hazardous Waste Treatment Unit		Permit Part & Chapter: Part III, Chapter 6 and Attachment 36 [Section 4]			
<u>Description of Modification:</u>					
Section 4.1.2.2, page 4-3, lines 28-32					
4.1.2.2 Shielded Analytical Laboratory Container Management Practices					
Containers are not opened, handled, or stored in a manner that would cause the containers to leak or rupture. Containers will remain closed except when sampling, adding, or removing waste; or when analysis or treatment of the waste is ongoing. Containers of incompatible waste are segregated in the storage areas. Container stacking is not performed.					
Modification Class: ¹²³		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.					
<u>Enter wording of the modification from WAC 173-303-830, Appendix I citation:</u>					
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> 12-11-98		<i>R.F. Christensen</i> 1/5/99		<i>A. B. Stone</i>	
A. K. Ikenberry Date		R.F. Christensen Date		A. B. Stone Date	

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not approved

Hanford Facility RCRA Permit Modification Notification Form

Unit: 325 Hazardous Waste Treatment Unit	Permit Part & Chapter: Part III, Chapter 6 and Attachment 36 [Section 4]
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Description of Modification:

Section 4.1.7.2, page 4-9, lines 1-22:

4.1.7.2 Containment System Capacity for the Shielded Analytical Laboratory

The largest container of liquid waste to be stored in the hot cells is a 7.6-liter container.

The SAL tank is considered to be the secondary containment for the hot cells. The largest quantity of liquid that could be stored in the hot cells while maintaining adequate (10 percent of total volume) secondary containment would be 12,491 liters. The total amount of liquid to be stored in the hot cells is governed by the area constraint of the cells. ~~Typically, the largest amount of liquid waste to be stored in the hot cells at one time is 75.8 liters.~~

Liquid waste stored in Room 201 is stored in the fume hood. The waste is stored in glass or plastic bottles that are each placed in individual plastic containers of a size that is sufficient to hold all of the contents of the inner vessel; the largest container stored is 3.8 liters. The typical quantity of liquid waste stored in the hood is 11.3 liters, which is governed by the area constraint in the hood. Similarly, liquid waste stored in Room 202 is stored in glass or plastic bottles that are each placed in individual secondary containment. The typical quantity of liquid waste stored at one time in Room 202 is 114 liters.

The floors of the front face and back face are constructed of concrete. The rear face floor in Rooms 202 and 203 is covered with ~~vinyl tile~~ epoxy paint. Floor drains flow to the retention process sewer (RPS) system, which has a diverter triggered by a radiation monitor that diverts radioactive liquids detected in the RPS line to the RLWS. Because of the small quantities of liquid stored in the front face and back face, any spill that is not contained by the plastic overpack probably would remain on the floor in a localized area until cleaned. Any liquid that managed to flow to the room drains would be conveyed by gravity to the RPS system or, depending on radionuclide content, to the RLWS.

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: <i>Alice K. Ikenberry</i> 12-11-98 A. K. Ikenberry Date	Reviewed by RL Program Office: <i>R.F. Christensen</i> 1/5/99 R.F. Christensen Date	Reviewed by Ecology: <i>[Signature]</i> A. J. Stone Date
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Hanford Facility RCRA Permit Modification Notification Form

Unit: 325 Hazardous Waste Treatment Unit	Permit Part & Chapter: Part III, Chapter 6 and Attachment 36 [Section 4]
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Description of Modification:

Section 4.2, page 4-12, lines 24-36:

4.2 TANK SYSTEMS

The following sections describe the management of dangerous waste in the 325 tank systems. Each tank system consists of the tank; associated piping, valves and pumps; and secondary containment. The first tank system is located in Room 32 of the SAL and is used to collect liquid waste generated from the analytical laboratory operations. This SAL tank system is described in Section 4.2.1. The second tank system is the RLWS load out tank system. This tank system will used to collect liquid waste discharged to the RLWS prior to being transferred to the DST System. Design for the RLWS load out tank system is scheduled for completion in September 1997 and construction is scheduled to be complete in fiscal year 1998. ~~Currently, radioactive liquid waste is collected from the SAL tank and the HWTU and transferred to the 340 Building via the existing RLWS. There are no tanks associated with the existing RLWS.~~ Once the RLWS modifications are complete, the RLWS load out tank system will be operated as described in Section 4.2.2.

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

Relevant WAC 173-303-830, Appendix I Modification: A.3.

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

A. General Permit Provisions
3. Equipment replacement or upgrading.

Submitted by Co-Operator:	Reviewed by RL Program Office:	Reviewed by Ecology:
<i>A. K. Ikenberry</i> 12-11-98 A. K. Ikenberry Date	<i>R.F. Christensen</i> 1/5/99 R.F. Christensen Date	<i>[Signature]</i> A. B. [Signature] Date

not approved

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Hanford Facility RCRA Permit Modification Notification Form

Unit:
325 Hazardous Waste Treatment Unit

Permit Part & Chapter:
Part III, Chapter 6 and Attachment 36
[Section 6]

Description of Modification:

Section 6.1.1.2, page 6-1, lines 13-28:

6.1.1.2 Barrier and Means to Control Entry [F-1a(1)(a), (1)(b)]

The entire 300 Area is surrounded by a 2.4-meter chain link fence topped with three strands of barbed wire. There is no separate fence surrounding the 325 Building.

Entry to the 325 Building is indirectly controlled at all entry points to the 300 Area. Both active and passive controls are in place. Trespass warning signs are posted at all entry points. The Hanford Patrol periodically spot checks traffic entering the 300 Area. Entry to the 325 Building is controlled through the use of locked entrances with contact of 325 staff required for building access. The 325 HWTUs also are kept locked at all times. Access ~~and access records~~ to the 325 HWTUs are maintained by PNNL Security. The BED or designee has access to the 325 HWTUs and can provide access in an emergency. Personnel in possession of keys have been instructed to admit only persons having official business. All visitors to the 325 HWTUs must be escorted by HWTUs personnel.

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>Alex K. Ikenberry</i> 12-11-98 A. K. Ikenberry Date	<i>R.F. Christensen</i> 1/5/99 R.F. Christensen Date	<i>[Signature]</i> A. B. Stone Date

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Hanford Facility RCRA Permit Modification Notification Form

Unit: 325 Hazardous Waste Treatment Unit	Permit Part & Chapter: Part III, Chapter 6 and Attachment 36 [Section 6]
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Description of Modification:

Section 6.2.1.2, page 6-4, lines 15-17:

6.2.1.2 Frequency of Inspection

Emergency and safety equipment and personal protective equipment are visually inspected weekly. This frequency ensures that this the equipment always is functional and is available in adequate supply. On a quarterly basis this equipment is inspected by the 300 Area Fire Department.

Modification Class: ¹²³	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:

- A. General Permit Provisions
 1. Administrative and Informational changes.

Submitted by Co-Operator:	Reviewed by RL Program Office:	Reviewed by Ecology:
<i>Alex K. Ikenberry</i> 12-11-99 A. K. Ikenberry Date	<i>R.F. Christensen</i> 1/5/99 R.F. Christensen Date	<i>not approved</i> A. B. Stone Date

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Hanford Facility RCRA Permit Modification Notification Form

Unit: 325 Hazardous Waste Treatment Unit	Permit Part & Chapter: Part III, Chapter 6 and Attachment 36 [Section 6]
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Description of Modification:

Section 6.2.3, page 6-6; lines 13-21:

6.2.3 Inspection Log [F-2b]

Copies of the completed inspection checklists are provided to operations personnel and maintained in the 325 HWTUs files offices. Any corrective actions noted or deterioration or malfunctions in equipment discovered by the inspector are delegated to responsible individuals in the operations group. Corrective actions identified must be completed within 2 weeks unless there is documentation and reason for further delay. Examples of problems that could be identified and the corresponding remedial action are listed in Table 6.1. Inspection reports and corrective action response documentation are retained at the 325 HWTUs for a minimum of 5 years.

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> <i>12-11-98</i>	<i>R.F. Christensen</i> <i>1/5/99</i>	<i>[Signature]</i>
A. K. Ikenberry Date	R.F. Christensen Date	A. B. Stone Date

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Hanford Facility RCRA Permit Modification Notification Form

Unit:
325 Hazardous Waste Treatment Unit

Permit Part & Chapter:
Part III, Chapter 6 and Attachment 36
[Section 6]

Description of Modification:

Section 6.4.1, pages 6-10, lines 22-33:

6.4.1 Unloading Operations [F-4a]

Procedures have been developed to prevent hazards and to minimize the potential for breakage, punctures, or the accidental opening of containers during the transfer of waste to the 325 HWTUs. All waste is inspected before acceptance to ensure that the waste is in appropriate containers and that the containers are in good condition. Inspection of containers before acceptance minimizes the potential for spills during unloading operations. The potential for spills during waste handling also is minimized through the use of appropriate container-handling equipment; small waste items can be unloaded by hand.

The volumes of dangerous waste entering and exiting the SAL are in relatively small containers (Chapter 4.0) and ~~Liquid containers will~~ have some double containment because of the packaging requirements for the radioactive materials. Any spill from such containers will be contained and not released to the environment.

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> 12-11-98 A. K. Ikenberry Date	<i>R.F. Christensen</i> 1/5/99 R.F. Christensen Date	<i>[Signature]</i> K. E. Stone Date

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Hanford Facility RCRA Permit Modification Notification Form

Unit: 325 Hazardous Waste Treatment Unit	Permit Part & Chapter: Part III, Chapter 6 and Attachment 36 [Section 6]
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Description of Modification:

Section 6.4.2, pages 6-11, lines 10-28

6.4.2 Run-off [F-4b]

The secondary containment system for the six large, interconnected hot cells involves the use of a ~~pan-type container in which the primary liquid container is placed during an operation. This outer container contains any liquid spill or leak from the primary container during the operation.~~ In addition, the base of the cell is constructed of stainless steel with a 15.2-centimeter-wide by 6.7-centimeter-deep **stainless steel** trough that runs continuously along the front face of each of the 1.8-meter cells.

Typically, the use of the secondary containment system is enough to ensure that waste is safely contained. If there were to be a larger scale spill, however, the cell base and trough would collect any spilled waste within the cell. The spills are drained by gravity through drains in the bottom of the trough and stainless steel piping to the SAL tank.

Specially designed, shielded, 208-liter containers are used as the secondary containment system for the back side of the SAL. The back side of the SAL is used to store mainly solid mixed waste in cans, which are packed in the containers. Any liquids ~~can be stored here, however,~~ are placed in plastic, pan-type containers for secondary containment ~~as previously described or~~ **within DOT shipping containers.**

Modification Class: ¹²³	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:

- 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> <i>12-11-96</i>	<i>RF Christensen</i> <i>1/5/99</i>	<i>[Signature]</i>
A. K. Ikenberry Date	R.F. Christensen Date	A. B. Stone Date

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Hanford Facility RCRA Permit Modification Notification Form

Unit:
325 Hazardous Waste Treatment Unit

Permit Part & Chapter:
Part III, Chapter 6 and Attachment 36
[Section 6]

Description of Modification:

Section 6.4.5, page 6-12, lines 12-21:

6.4.5 Personal Protection Equipment [F-4e]

Protective clothing and equipment are provided to employees during normal and emergency operations. Protection levels for emergency situations are determined either in consultation with an industrial hygienist or applicable radiological work permits (RWP) or applicable operating procedure.

During routine operations, the maximum number of personnel working in the SAL is five. Personal protective equipment is required in the front portion of the SAL when working in the fume hood or handling chemicals on the bench top. For personnel working in the back portion of the SAL, the minimum protection requirement is full radiological protective clothing (coveralls, hood, inner and outer gloves, canvas boots, and boot covers). Protective clothing and equipment available at the SAL include, but are not limited to, the following:

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> 12-11-98 A. K. Ikenberry Date	<i>R.F. Christensen</i> 1/5/99 R.F. Christensen Date	<i>[Signature]</i> A.B. Stone Date

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Hanford Facility RCRA Permit Modification Notification Form

Unit: 325 Hazardous Waste Treatment Unit	Permit Part & Chapter: Part III, Chapter 6 and Attachment 36, Appendix 3A
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Description of Modification:

Appendix 3A, Section 1.2.4, page 1-12, lines 24-41:

~~Dangerous waste~~ Waste from research activities using radioactive isotopes is designated as dangerous waste and typically ~~is~~ may be generated in small quantities ranging from a few grams to a few liters. These waste types consist primarily of radiologically contaminated chemicals, such as organics. Waste is designated based on process knowledge or on the basis of sampling and analysis. Process knowledge is used if the generator has kept accurate records of the identities and concentrations of constituents present in the waste (e.g., log sheets for accumulation containers). If information available from the generator is inadequate for waste designation, then the waste is sampled and the results of the analysis are used for designation. These waste types include waste designated as characteristic dangerous-waste mixtures under WAC 173-303-090 and waste designated as dangerous waste under WAC 173-303-100. The Part A permit application, Form 3, includes all categories of toxic and persistent waste mixtures (i.e., both dangerous waste and extremely hazardous waste). While not all of these waste types currently are generated or have been generated, the wide variety of research activities conducted on the Hanford Facility presents the potential that these waste types could be generated and could require subsequent management at the 325 HWTUs. Similarly, the Part A permit application, Form 3, includes the characteristic dangerous-waste categories D001 through D043 (i.e., ignitable, corrosive, reactive, and TCLP toxic because of metals or organics content).

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>Alice K. Ikenberry</i> 12-11-98 A. K. Ikenberry Date	<i>R.F. Christensen</i> 1/5/99 R.F. Christensen Date	<i>[Signature]</i> A. B. Stone Date

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Hanford Facility RCRA Permit Modification Notification Form

Unit: 325 Hazardous Waste Treatment Unit	Permit Part & Chapter: Part III, Chapter 6 and Attachment 36, Appendix 3A
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Description of Modification:

Appendix 3A, Section 2.2, pages 2-3 , lines 20-35:

2.2 VERIFICATION

Where potential deficiencies exist in the information provided or where additional waste constituents might be expected to be present that do not appear on the waste-tracking form (CDRR) and supporting documentation, the generator is contacted by 325 HWTUs personnel for resolution. Upon approval, the 325 HWTUs personnel review the form- data package to determine whether or not the following information is sufficient to complete the following:

- appropriate waste designation per WAC 173-303-070
- LDR per 40 CFR 268
- packaging, marking, and labeling requirements
- DOT compatibility groups, if applicable
- identification of a proper storage location within the 325 HWTUs.

Analysis and characterization, as required by WAC 173-303-300(2), are performed on each waste before acceptance at the 325 HWTUs to determine waste designation and characteristics. The characterization of the waste, based on this information, is reviewed each time a waste is accepted. The information must be updated by the generator annually or when the waste stream changes, whichever comes first, or if the following occurs.

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> 12-11-98	<i>R.F. Christensen</i> 1/5/99	<i>A. E. Stone</i>
A. K. Ikenberry Date	R.F. Christensen Date	A. E. Stone 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.

Not approved

Hanford Facility RCRA Permit Modification Notification Form

Unit: 325 Hazardous Waste Treatment Unit	Permit Part & Chapter: Part III, Chapter 6 and Attachment 36, Appendix 3A
--	--

Description of Modification:

Appendix 3A, Section 3.0, page 3-1, lines 20-26:

Sampling and laboratory analysis could be required to verify or establish waste characteristics for waste that is stored at the 325 HWTUs. The following are instances where sampling and laboratory analysis is required:

- inadequate information on PNNL-generated waste
- 5% waste verification for PNNL-generated waste
- 10 percent waste verification for non-PNNL-generated waste identification and characterization for unknown waste prior to receipt and unknown spills within the 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: <i>A. K. Ikenberry</i> 12-11-98 A. K. Ikenberry Date	Reviewed by RL Program Office: <i>R.F. Christensen</i> 1/5/99 R.F. Christensen Date	Reviewed by Ecology: <i>Not approved</i> A. B. Stone Date
--	---	---

¹Class 1 modifications requiring prior Agency approval.

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Hanford Facility RCRA Permit Modification Notification Form

Unit: 325 Hazardous Waste Treatment Unit		Permit Part & Chapter: Part III, Chapter 6 and Attachment 36, Appendix 3A		
<u>Description of Modification:</u>				
Appendix 3A, Section 4.0, page 4-3, lines 1-4:				
Generators or 325 HWTUs personnel also document the sampling activities and chain of custody and arrange sample shipment. Sampling information, HWTUs custody records, and analytical results are submitted, as appropriate, as part of the waste-tracking form data package submitted by the generator to the waste-management section for review, approval, and designation.				
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.				
<u>Enter wording of the modification from WAC 173-303-830, Appendix I citation:</u>				
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> 12-11-98 A. K. Ikenberry Date	<i>R.F. Christensen</i> 1/5/99 R.F. Christensen Date	<i>[Signature]</i> A. B. Stone Date		

¹Class 1 modifications requiring prior Agency approval.

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Hanford Facility RCRA Permit Modification Notification Form

Unit:
325 Hazardous Waste Treatment Unit

Permit Part & Chapter:
Part III, Chapter 6 and Attachment 36,
Appendix 3A

Description of Modification:

Appendix 3A, Section 4.0, page 4-3, lines 17-29:

The basic sampling procedure is as follows:

- ~~Obtain samples using a precleaned sampler.~~
- ~~Fill sample containers in the following sequence: head space volatile organics, volatile organics, semi-volatile organics, metals, ignitability, pH (corrosivity), reactivity, radiochemical parameters.~~
- ~~Label sample containers.~~
- ~~Properly clean and decontaminate sample containers and the sampling hardware.~~
- ~~Custody seal and blister wrap all sample containers, place wrapped containers in a leak tight polyethylene bag, and place samples in a durable ice filled cooler or comparable receptacle for transport to the laboratory or laboratory receiving facility. Radioactive dose rate permitting, custody seal and blister wrap will be used; otherwise, seals will be placed on secondary containers.~~
- ~~Complete the chain of custody and request for analysis forms.~~
- ~~Review all paperwork and enclose the forms in a leak tight polyethylene bag taped to the underside of the cooler lid or attach paperwork to the container as appropriate.~~
- ~~Seal and mark the coolers or comparable receptacles in accordance with applicable DOT requirements.~~
- ~~Transport coolers or appropriate containers to the analytical laboratory or laboratory receiving facility.~~

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:

A. K. Ikenberry 12-11-98
A. K. Ikenberry Date

Reviewed by RL Program Office:

R.F. Christensen 1/5/99
R.F. Christensen Date

Reviewed by Ecology:

A. B. Stone
A. B. Stone Date

¹Class 1 modifications requiring prior Agency approval.

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Hanford Facility RCRA Permit Modification Notification Form

Unit:
325 Hazardous Waste Treatment Unit

Permit Part & Chapter:
**Part III, Chapter 6 and Attachment 36,
Appendix 3A**

Description of Modification:

Appendix 3A, Section 4.0, pages 4-3 & 4-4, lines 30-7:

Sample-container selection is crucial to sample quality. Considering waste compatibility, durability, volume, and analytical sensitivities, the containers listed in Table 4.1 are recommended to the generators for these efforts.

All samples are labeled with at least the following information The following information will be included with all samples, as required:

- a unique alpha-numeric identifier
- date and time of collection
- sample collector's name
- preservatives used
- analyses requested.

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> 12-11-98	<i>R.F. Christensen</i> 1/5/99	<i>A. B. Stone</i>
A. K. Ikenberry Date	R.F. Christensen Date	A. B. Stone 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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Not approved

Hanford Facility RCRA Permit Modification Notification Form

Unit:
325 Hazardous Waste Treatment Unit

Permit Part & Chapter:
**Part III, Chapter 6 and Attachment 36,
Appendix 3A**

Description of Modification:

Appendix 3A, Section 4.0, pages 4-4, lines 8-23:

Immediately after collection, samples are placed on blue ice or an equivalent, as required, in durable coolers or comparable receptacles for transport to the offsite laboratory. Before shipping or transfer, coolers or comparable receptacles are tightly sealed with duct tape and are custody-sealed along the front and back edges of the lids. ~~Samples are transported to offsite laboratories within 24 hours of collection.~~ **As required** samples are transported to offsite laboratories by overnight courier to ensure delivery within 24 hours of sample collection. All offsite sample collection, preparation, packaging, transportation, and analyses conform to the requirements of SW-846 or equivalent.

During all sampling activities, strict compliance with health physics, industrial hygiene, and safety standards is mandatory. Personnel are required to wear eye-, skin-, and respiratory-protection gear as dictated by industrial hygiene and health- physics personnel. If personnel accidentally contact waste material, decontamination procedures are to be performed immediately.

A chain-of-custody record accompanies samples being analyzed for chemical constituents at all times. The record contains the sample number, date and time of collection, sample description, and signatures of the collector and all subsequent custodians.

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> 12-11-98 A. K. Ikenberry Date	<i>R.F. Christensen</i> 1/5/99 R.F. Christensen Date	<i>[Signature]</i> A. Stone Date

not approved

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: 325 Hazardous Waste Treatment Unit	Permit Part & Chapter: Part III, Chapter 6 and Attachment 36, Appendix 3A
--	--

Description of Modification:

Appendix 3A, Section 4.4.1, pages 4-5 & 4-6, lines 32-11:

4.4.1 Fingerprint Sampling Analytical Methods

A representative sample will be taken of the waste (if more than one phase is present, each phase must be tested individually), and the following field tests will be performed **to confirm stated characteristics or as necessary**

- Reactivity – HAZCAT oxidizer, cyanide, and sulfide tests. These tests will **not** be performed on materials known to be organic peroxides, ethers, and/or water-reactive compounds.
- Flashpoint/explosivity – by HAZCAT flammability Procedure B, explosive-atmosphere meter, or a closed-cup flashpoint-measurement instrument.
- pH - by pH meter or pH paper (SW-846 9041). This test will not be performed on non-aqueous materials (i.e., organic solvents).
- Halogenated organic compounds - by organic-vapor analyzer with a flame ionization detector, Chlor-D-Tect kits, or the HAZCAT fluoride, chloride, bromide, and iodide tests.
- Volatile organic compounds - by gas chromatograph/mass spectrometer or gas chromatograph (GC) with a photo- or flame-ionization detector.

Modification Class: ¹²³	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:

- 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> 12-11-98	<i>R.F. Christensen</i> 1/5/99	<i>[Signature]</i>
A. K. Ikenberry Date	R.F. Christensen Date	A. B. Stone Date

¹Class 1 modifications requiring prior Agency approval.

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Hanford Facility RCRA Permit Modification Notification Form

Unit:
325 Hazardous Waste Treatment Unit

Permit Part & Chapter:
**Part III, Chapter 6 and Attachment 36,
Appendix 3A**

Description of Modification:

Appendix 3A, Section 6.0, page 6-1, lines 1-16:

~~Essentially all of the waste received at the 325 HWTUs is characterized before acceptance.~~

Some analysis will be needed to verify that waste streams received by the 325 HWTUs conform to the information on the CDRR and or the waste analysis sheet supplied by the generator. If discrepancies are found between information on the CDRR, hazardous-waste manifest, shipping papers, waste- analysis documentation and/or verification analysis, then the discrepancy will be resolved by:

- (1) returning waste to the generator, or sample and analyze the materials in accordance with WAC 173-303-110; and/or
- (2) reassessing and redesignating the waste; repackaging and labeling as necessary or return to the generator.

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>Alex K. Ikenberry</i> 12-11-98 A. K. Ikenberry Date	<i>R.F. Christensen</i> 4/5/99 R.F. Christensen Date	<i>[Signature]</i> A, B, State Date

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Hanford Facility RCRA Permit Modification Notification Form

Unit:
325 Hazardous Waste Treatment Unit

Permit Part & Chapter:
**Part III, Chapter 6 and Attachment 36,
Appendix 3A**

Description of Modification:

Appendix 3A, Section 6.0, Page 6-1, lines 19-36:

~~Analysis and characterization, as required by WAC 173-303-300(2), are performed on each waste before acceptance at the 325 HWTUs to determine waste designation and characteristics. The characterization of the waste, based on this information, is reviewed each time a waste is accepted. The information must be updated by the generator annually or when the waste stream changes, whichever comes first, or if the following occurs.~~

- ~~▪ The 325 HWTUs personnel have reason to suspect a change in the waste, based on inconsistencies in packaging or labeling of the waste.~~
- ~~▪ The information submitted previously does not match the characteristics of the waste submitted.~~

~~Sampling and laboratory analysis could be required to verify or establish waste characteristics for waste that is stored at the 325 HWTUs. The following are instances where sampling and laboratory analysis are required:~~

- ~~▪ inadequate information on PNNL generated waste~~
- ~~▪ waste streams generated onsite will be verified at 5 percent of each waste stream~~
- ~~▪ inadequate information before waste was shipped or discrepancy discovered~~
- ~~▪ waste streams received for treatment from offsite generators will be verified at 10 percent of each waste stream applied per generator, per shipment~~
- ~~▪ identification and characterization for unknown waste and spills.~~

Modification Class: ¹²³	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:

- 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> 12-11-98 A. K. Ikenberry Date	<i>R.F. Christensen</i> 1/5/99 R.F. Christensen Date	<i>[Signature]</i> A. B. Stone Date

not approved

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Hanford Facility RCRA Permit Modification Notification Form

Unit:
325 Hazardous Waste Treatment Unit

Permit Part & Chapter:
**Part III, Chapter 6 and Attachment 36,
Appendix 3A**

Description of Modification:

Appendix 3A, Section 7.0, Page 7-1, line 2-17:

7.1 PROCEDURES FOR RECEIVING SHIPMENTS

The generator is responsible for identifying waste composition accurately and arranging for the transport of the waste. A copy of each ~~transfer tracking form and any other~~ pertinent operating records are maintained by the 325 HWTUs for 3 years. The waste-tracking methods are as follows.

- **Inspection of Transfer Papers/Documentation** — ~~The~~ As required, the necessary transfer papers for the entire transfer are verified (i.e., signatures are dated, all waste containers included in the transfer are accounted for and correctly indicated on the transfer documentation, there is consistency throughout the different transfer documentation, and the documentation matches the labels on the containers).
- **Inspection of Waste Containers** — The condition of waste containers is checked to verify that the containers are in good condition (i.e., free of holes and punctures).
- **Inspection of Container Labeling** — ~~Transfer documentation is used to~~ HWTU personnel verify that the containers are labeled with the appropriate "Hazardous/Dangerous Waste" labeling and associated markings according to the contents of the waste container.
- **Acceptance of Waste Containers** — ~~The~~ As required, the 325 HWTUs personnel sign the transfer documents and retain a copy.

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>Alicia K. Ikenberry</i> 12-11-98	<i>R.F. Christensen</i> 1/5/99	<i>[Signature]</i>
A. K. Ikenberry Date	R.F. Christensen Date	A. B. Stone Date

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Hanford Facility RCRA Permit Modification Notification Form

Unit:
325 Hazardous Waste Treatment Unit

Permit Part & Chapter:
**Part III, Chapter 6 and Attachment 36,
Appendix 8A**

Description of Modification:

Appendix 8A, Section 8.1.1.1, page 8A-2, lines 22-28:

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

The HWTU ~~Technical Specialist~~ ~~Engineer/Scientist~~(s) is responsible for the proper acceptance, treatment, storage, and transport of dangerous waste at the HWTU. In addition, the HWTU ~~Technical Specialist~~ ~~Science/Engineer Associate~~ oversees dangerous waste pickup and transportation to the HWTU storage areas. When adequate volumes of waste have accumulated, the HWTU ~~Technical Specialist~~ ~~Science/Engineer Associate~~ is responsible for readying the waste for transfer. These duties could include packaging, labeling, manifesting, and recordkeeping to ensure compliance with applicable regulations.

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> 12-11-99 A. K. Ikenberry Date	<i>R.F. Christensen</i> 1/5/99 R.F. Christensen Date	<i>[Signature]</i> A. H. Stone Date

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Hanford Facility RCRA Permit Modification Notification Form

Unit:
325 Hazardous Waste Treatment Unit

Permit Part & Chapter:
**Part III, Chapter 6 and Attachment 36,
Appendix 8A**

Description of Modification:

Appendix 8A, Section 8.1.1.2, page 8A-3, lines 4-15:

8.1.1.2 Shielded Analytical Laboratory Job Titles and Descriptions

~~The SAL Technical Group Leader (Supervisor) has responsibility for all operations within the SAL portion of the 325 HWTUs at the technical group management level. This includes all technical, managerial, and operational aspects of the SAL.~~

~~The SAL Technical Group Leader has responsibility for all aspects of the day to day operation of the SAL. Guidance and direction is provided to all personnel in the technical group. Final decisionmaking for operations within the technical group rests with the SAL Technical Group Leader. The SAL Technical Group Leader is responsible for the daily operations of the SAL, including all aspects of mixed waste treatment activities. This includes ensuring compliance with RCRA, WAC 173-303, and PNNL waste operating procedures. The SAL Technical Group Leader also serves as a zone warden for the SAL and assists the 325 Building BED in the event of an offnormal event or emergency.~~

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> 12-11-98 A. K. Ikenberry Date	<i>R.F. Christensen</i> 1/5/99 R.F. Christensen Date	<i>[Signature]</i> A. B. Stone Date

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Hanford Facility RCRA Permit Modification Notification Form

Unit:
325 Hazardous Waste Treatment Unit

Permit Part & Chapter:
**Part III, Chapter 6 and Attachment 36,
Appendix 8A**

Description of Modification:

Appendix 8A, Section 8.1.1.2, page 8A-3, lines 23-29:

8.1.1.2 Shielded Analytical Laboratory Job Titles and Descriptions.

The SAL ~~Technical Specialist(s)~~ and Technician(s) are responsible for the preparation and analysis of samples and conducting research activities as performed in analytical chemistry hot cells. The positions also involve all aspects of hot cell operation and master/slave manipulator operation, including the operation of analytical instrumentation situated in the hot cells.

~~The SAL Clerk(s) assists the Technical Group Leader in recordkeeping, database maintenance, and preparation of reports, labels, manifests, waste tracking forms, and other associated documentation.~~

Modification Class: ¹²³	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:

- 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> <i>12-11-98</i>	<i>R.F. Christensen</i> <i>1/5/99</i>	<i>[Signature]</i>
A. K. Ikenberry Date	R.F. Christensen Date	A.E. Stone Date

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Hanford Facility RCRA Permit Modification Notification Form

Unit: 325 Hazardous Waste Treatment Unit	Permit Part & Chapter: Part III, Chapter 6 and Attachment 36, Appendix 8A
--	---

Description of Modification:

Appendix 8A, Section 8.1.4, page 8A-4 & 8A-5, lines 34-8:

8.1.4 Relevance of Training to Job Position [H-1d]

- ~~Hazardous Waste Management/Hazardous and Mixed Waste Generator—Annual Advanced Waste Management [Hazardous (HAZ), Low-Level (LLW), Mixed (MW) and Transuranic (TRU) – Course #1084: This training covers internal PNNL dangerous and mixed waste procedures and issues and regulatory requirements applicable to PNNL operations.~~
- ~~Hazardous Material Shipping Representative—Annual: This course introduces the requirements for transferring or shipping hazardous materials onsite and offsite.~~
- ~~Radioactive Liquid Waste System Training—Annual: This course familiarizes personnel with the radioactive liquid waste system (RLWS) and provides specific waste acceptance criteria. In addition, the characteristics of hazardous waste are discussed.~~
- ~~Low Level Waste Package Training—Annual: This course provides details associated with the disposal of solid low level waste. The course shows the waste certification process, along with the paperwork associated with the physical disposal process.~~
- ~~Transuranic (TRU) Waste Packager Training—Annual: This class covers the applicable requirements for packaging, storing, certifying, and shipping TRU waste.~~

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> 12-11-98	<i>R.F. Christensen</i> 1/5/99	<i>A.E. Stone</i>
A. K. Ikenberry Date	R.F. Christensen Date	A. E. Stone Date

Not Approved

¹Class 1 modifications requiring prior Agency approval.

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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: 325 Hazardous Waste Treatment Unit	Permit Part & Chapter: Part III, Chapter 6 and Attachment 36, Appendix 8A
--	--

Description of Modification:

Appendix 8A, Section 8.1.4, page 8A-6, lines 1-3:

8.1.4 Relevance of Training to Job Position [H-1d]

Training is tracked and documented through the laboratory training database system (LTDS). Training records and class documentation are held on file in the operations offices at the 325 HWTUs as part of the Operating Records.

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> 12-11-98	<i>R.F. Christensen</i> 1/5/99	<i>not approved</i>
A. K. Ikenberry Date	R.F. Christensen Date	A. B. Stone Date

¹Class 1 modifications requiring prior Agency approval.

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Hanford Facility RCRA Permit Modification Notification Form

Unit:
325 Hazardous Waste Treatment Unit

Permit Part & Chapter:
Part III, Chapter 6 and Attachment 36,
Appendix 8A

Description of Modification:

Appendix 8A, Section 8.1.5.1, page 8A-6, lines 12-31:

8.1.5.1 Procedures for Using, Inspecting, Repairing, and Replacing Unit Emergency and Monitoring Equipment

Personnel operating the 325 HWTUs are adequately trained to ensure prompt and effective response to emergency situations that might arise during operation. The following required safety courses address emergency response and outline procedures for using, inspecting, repairing, and replacing unit emergency and monitoring equipment.

- 325 Building Emergency Procedure and Contingency Plan—Annually or when changes are made, whichever is more frequent: This course familiarizes personnel with the specific responsibilities of the emergency procedures and the written contingency plan.
- Respiratory Protection--Annual: This course familiarizes the personnel with the proper use of air purifying respirators and their limitations. It also makes personnel aware of potential respiratory hazards, how to recognize the hazards, and what actions to take.

Treatment, Storage, or Disposal (TSD) Facility Hazardous Waste Operations Training--24-hour initial training and an 8-hour annual refresher: This course provides extensive instruction on the use of field survey instruments such as combustible gas indicators, oxygen meters, detector tube systems, photo and flame ionization instruments, organic vapor analyzer (OVA) meters, and atmospheric sampling instruments. Other topics covered include heat-induced illnesses, OSHA's Emergency Response Standards, lists of personal protective equipment, hazardous materials classification systems, confined space work practices, liquid storage tanks, contamination control, toxicology, and medical monitoring.

Modification Class: ¹²³	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:

- 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> 12-11-98 A. K. Ikenberry Date	<i>R.F. Christensen</i> 4/5/99 R.F. Christensen Date	<i>[Signature]</i> A. B. Stone Date

¹Class 1 modifications requiring prior Agency approval.

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Hanford Facility RCRA Permit Modification Notification Form

Unit:
325 Hazardous Waste Treatment Unit

Permit Part & Chapter:
Part III, Chapter 6 and Attachment 36,
Appendix 8A

Description of Modification:

Appendix 8A, Section 8.1.5.6, page 8A-7, lines 17-22:

8.1.5.6 Shutdown of Operations

In the event of a shutdown of operations in the 325 HWTUs due to an emergency situation, personnel follow plans outlined in the 325 HWTUs Contingency Plan. As mentioned previously, all personnel are trained annually in the implementation of the Contingency Plan. The persons responsible for the decision to shut down either unit are the HWTU Activity Manager and the SAL Technical Group Leader any HWTU staff member.

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

- Administrative and Informational changes.

Submitted by Co-Operator:

A. K. Ikenberry 12-11-99
A. K. Ikenberry Date

Reviewed by RL Program Office:

R.F. Christensen 1/5/99
R.F. Christensen Date

Reviewed by Ecology:

A. R. Stone
A. R. Stone Date

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Hanford Facility RCRA Permit Modification Notification Form

Unit:
325 Hazardous Waste Treatment Unit

Permit Part & Chapter:
Part III, Chapter 6 and Attachment 36,
Appendix 8A

Description of Modification:

Appendix 8A, Table 1, page 8A-8:

Table 8-1. 325 Hazardous Waste Treatment Units Training Requirements

TRAINING COURSE NAME	JOB POSITION												
	HWTU Personnel						SAL Personnel						
	AM	IN	T	C	GR	W	F	C	DB				
025 Building Emergency Procedure	A	A	A	A	A	A	A	A	A	A	A	A	A
325 HWTUs Contingency Plan	A	A	A	A	A	A	A	A	A	A	A	A	A
Laboratory Standard Hazard Communication	I	I	I	I	I	I	I	I	I	I	I	I	I
Radiological Worker (Refresher)	N	N	N	N	N	N	N	N	N	N	N	N	N
Radiological Worker (Refresher)	B	B	B	B	B	B	B	B	B	B	B	B	B
Respiratory Protection	A	A	A	A	N	M	A	A	A	A	A	A	A
Hazardous Waste Management	A	A	A	A	N	A	A	A	A	A	A	A	A
Hazardous Material Shipping Representative	B	B	N	N	M	B	M	B	N	B	N	B	N
24-Hour TSD Facility Hazardous Waste Operations	EA	EA	EA	EA	EA	EA	EA	EA	EA	EA	EA	EA	EA
Radioactive Liquid Waste System Training	A	A	A	M	N	A	A	A	N	N			
Low-Level Waste (LLW) Packaging Training	A	A	A	M	A	A	M	N	N				
Intermediate (IHL) Waste Packaging	A	A	A	M	A	A	A	A	N	N			
Emergency Safety Showers & Eyewash Stations	I	I	I	N	I	I	I	I	N	I			
Laboratory Hood Safety	B	B	B	N	M	B	B	N	B	N			
Glove Box Operational Safety	B	B	B	N	N	N	M	N	N				
Lock & Tag for Authorized Staff Members	A	N	N	N	M	A	N	N	A				
Lock & Tag General Employee Orientation	N	I	I	N	I	I	I	N	N				
Crane-Hoist & Rigging Safety	T	T	T	N	M	T	N	N					
Hands On Fire Extinguisher Use	A	A	A	N	N	A	N	N	N				
Operational Safety Requirements General	B	B	B	B	B	B	B	B	B				
325 Building O&R Checklist	B	B	B	B	B	B	B	B	B				
325 HWTUs Permit Application Review	A	A	A	N	A	A	A	A	N	N			
Applicable 325 TSD-related Operational Procedures	I ¹	I ¹	N	A	I ¹	A	N	N					

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>A. K. Ikenberry</i> A. K. Ikenberry	Reviewed by RL Program Office: <i>R.F. Christensen</i> R.F. Christensen	Reviewed by Ecology: <i>A. B. Stone</i> A. B. Stone
<i>12-11-97</i> Date	<i>1/5/99</i> Date	 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: 325 Hazardous Waste Treatment Unit	Permit Part & Chapter: Part III, Chapter 6 and Attachment 36, Appendix 8A
--	---

Description of Modification:

Appendix 8A, Table 1, page 8A-9:

- 1 Job Position Key:
- 2 AM - HWTU Activity Manager
- 3 ~~GL - SAL Technical Group Leader~~
- 4 WT - SAL Waste Technician
- 5 ~~T - Unit/SAL Technical Specialist/Technician~~
- 6 TS - Unit Technical Specialist
- 7 ~~ES - Environmental Specialist~~
- 8 C - Unit/SAL Clerk
- 9 BED - Building Emergency Director

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:

- B. General Permit Provisions
- 2. Administrative and Informational changes.

Submitted by Co-Operator:	Reviewed by RL Program Office:	Reviewed by Ecology:
<i>A.K. Ikenberry</i> 12/11/98	<i>R.F. Christensen</i> 1/5/99	<i>A.E. Stone</i>
A. K. Ikenberry Date	R.F. Christensen Date	A. E. Stone Date

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Enclosure 2

Approved Quarterly Class 1 Modifications

Hanford Facility RCRA Permit Modification Notification Form				
Unit: 325 Hazardous Waste Treatment Unit		Permit Part & Chapter: Part III, Chapter 6 and Attachment 36 [Section 4]		
<u>Description of Modification:</u>				
Section 4.1.4.1, page 4-5, lines 18-22				
4.1.4.1. Secondary Containment System Design and Operation for the Hazardous Waste Treatment Unit				
Major spills or leaks of liquid mixed waste flow into the fire water containment system. The fire water containment system consists of floor trenches located at each entrance to the rooms and the fire water containment tank located in the basement of the building. The system is was originally designed to collect the fire-suppression water in the event that the automatic sprinkler system was activated. The location of the trenches is shown in Figure 4.1.				
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.				
<u>Enter wording of the modification from WAC 173-303-830, Appendix I citation:</u>				
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> 12-11-98		<i>R.F. Christensen</i> 1/5/99		<i>A. B. Stone</i> 2/4/99
A. K. Ikenberry Date		R.F. Christensen Date		A. B. Stone Date

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Hanford Facility RCRA Permit Modification Notification Form

Unit:
325 Hazardous Waste Treatment Unit

Permit Part & Chapter:
Part III, Chapter 6 and Attachment 36
[Section 4]

Description of Modification:

Section 4.1.5.1, pages 4-6 & 4-7, lines 34-5:

4.1.5.1 Requirements for Base or Liner to Contain Liquids in the Hazardous Waste Treatment Unit

The floors in Rooms 520 and 528 have been equipped with the chemical-resistant polypropylene coating. All seams in the coating were finished by heat welding to ensure the integrity of the coating. The coating currently is free of cracks and gaps and will be maintained that way throughout the life of the HWTU. The condition of the floor is inspected weekly as part of the inspection program (Chapter 6.0). Floor coating assessment is carried out whenever the floor coating is observed to have been chipped, bubbled up, scraped, or otherwise damaged in a manner that would impact the ability of the coating to contain spilled materials. ~~Tile could be removed from the floor to determine the integrity of the floor coating.~~ Minor nicks and small chips resulting from normal operations are repaired periodically.

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 12-11-98
A. K. Ikenberry Date

R.F. Christensen 1/5/99
R.F. Christensen Date

A. B. Stone 2/4/99
A. B. Stone Date

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Hanford Facility RCRA Permit Modification Notification Form

Unit: 325 Hazardous Waste Treatment Unit		Permit Part & Chapter: Part III, Chapter 6 and Attachment 36 [Section 4]		
<u>Description of Modification:</u>				
Section 4.1.5.2, page 4-7, lines 32-38				
4.1.5.2 Requirements for Base or Liner to Contain Liquids in the Shielded Analytical Laboratory				
The bases of the back face and front face of the SAL consist of a 15.2 centimeter, reinforced, poured concrete slabs with no cracks or gaps. The concrete base has a load capacity of 976 kilograms per square meter. The base in Room 201 is topped with a seamless chemical resistant polypropylene coating. Rooms 202 and 203 are topped with floor tile epoxy based paint. In Room 200, the concrete slab is painted, and there is a trap door in the painted floor of Room 200 that enables transfer of equipment between Rooms 200 and 32. The air flow between these rooms is from Room 200 to Room 32 due to positive air pressure in Room 200.				
Modification Class: ¹²³	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.				
<u>Enter wording of the modification from WAC 173-303-830. Appendix I citation:</u>				
A. General Permit Provisions				
1. Administrative and Informational changes.				
Submitted by Co-Operator:	Reviewed by RL Program Office:		Reviewed by Ecology:	
<i>Alex K. Ikenberry</i> 12-11-98 A. K. Ikenberry Date	<i>R.F. Christensen</i> 1/5/99 R.F. Christensen Date		<i>Alex Stone</i> 2/4/99 A. B. Stone Date	

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Hanford Facility RCRA Permit Modification Notification Form

Unit: 325 Hazardous Waste Treatment Unit		Permit Part & Chapter: Part III, Chapter 6 and Attachment 36 [Section 4]		
<u>Description of Modification:</u>				
Section 4.1.6.1, page 4-8, lines 4-13:				
4.1.6.1 Containment System Drainage for the Hazardous Waste Treatment Unit				
<p>The floors in Rooms 520 and 528 are not sloped. Small spills of liquid probably will remain in a localized area until the spills are cleaned up. All containers of dangerous waste are stored either on in drums, dollys, on shelves within open-faced hoods, or within flammable or corrosives storage cabinets to prevent the containers from contacting spilled materials. Large spills of liquid material would spread laterally across the flat surface of the floor. The flow of the spilled liquid would be stopped by an outside wall(s) of the room or by one of the trenches protecting the entrances to the room. The lower 10 centimeters of the outside walls of the rooms are covered with the same chemical-resistant coating as that on the floor to prevent spills from migrating throughout the walls.</p>				
Modification Class: ¹²³	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.				
<u>Enter wording of the modification from WAC 173-303-830, Appendix I citation:</u>				
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> <i>12-11-98</i>	<i>R.F. Christensen</i> <i>1/5/99</i>	<i>A. B. Stone</i> <i>2/4/99</i>		
A. K. Ikenberry Date	R.F. Christensen Date	A. B. Stone Date		

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Hanford Facility RCRA Permit Modification Notification Form

Unit: 325 Hazardous Waste Treatment Unit		Permit Part & Chapter: Part III, Chapter 6 and Attachment 36 [Section 4]		
<u>Description of Modification:</u>				
Section 4.1.6.2, page 4-8, lines 18-27:				
4.1.6.2 Containment System Drainage for the Shielded Analytical Laboratory				
The stainless steel base of the hot cell is not sloped. Because of the small volume of waste that is handled, small spills probably would remain in a localized area until the spills are cleaned up. As a result, all containers of liquid mixed waste are stored within secondary containment to prevent spilled liquids from contacting the containers. Large spills that occur within the SAL hot cells flow to the stainless steel trough at the front of each cell, which gravity drains into the SAL tank (TK-1, Room 32).				
The bases of the front and back faces are not sloped. Containers in these areas are stored within secondary containment and off the base surface to prevent spilled liquids from contacting the containers.				
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.				
<u>Enter wording of the modification from WAC 173-303-830, Appendix I citation:</u>				
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> 12-11-98 A. K. Ikenberry Date	<i>ref Christensen</i> 1/5/99 R.F. Christensen Date	<i>A. B. Stone</i> 2/4/99 A. B. Stone Date		

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Hanford Facility RCRA Permit Modification Notification Form				
Unit: 325 Hazardous Waste Treatment Unit		Permit Part & Chapter: Part III, Chapter 6 and Attachment 36 [Section 4]		
<u>Description of Modification:</u>				
Section 4.2.1.2.2, page 4-15, lines 29-37:				
4.2.1.2.2 Requirements for Secondary Containment and Leak Detection				
<p>The secondary containment has been designed to prevent any migration of waste or accumulated liquid from the tank system to the soil, groundwater, or surface water. The secondary containment system also can detect and collect releases of accumulated liquids. A zoom color television camera surveillance system allows for tank, ancillary equipment, and general Room 32 viewing. The camera, located in Room 32, is equipped with auxiliary lighting and mounted on a remote controlled pan and tilt head. The color monitor and camera controls are housed in a dedicated cabinet in Room 527 and can also be installed moved to and operated in Room 201. The following is the system description.</p>				
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.				
<u>Enter wording of the modification from WAC 173-303-830. Appendix I citation:</u>				
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>	<i>R.F. Christensen</i> 1/5/99	<i>A. B. Stone</i> 2/4/99		
A. K. Ikenberry	R.F. Christensen	A. B. Stone		
Date	Date	Date		

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Hanford Facility RCRA Permit Modification Notification Form

Unit:
325 Hazardous Waste Treatment Unit

Permit Part & Chapter:
Part III, Chapter 6 and Attachment 36
[Section 4]

Description of Modification:

Section 4.2.1.5, pages 4-18 & 4-19, lines 37-11:

4.2.1.5 Ignitable, Reactive, and Incompatible Waste [D-2h]

Many different types of samples and waste materials will be brought to the SAL hot cells for analytical or research activities. These samples are accompanied by an internal PNNL documentation form that provides waste characterization information from the sample generating unit. Chemical characterization provided in these forms is based on previous chemical analysis or process knowledge. The hazard potential includes exposure to radiation, corrosive chemicals, and hazardous chemicals. All operations performed in the SAL hot cells are conducted by qualified operators following approved procedures. Typical hot cell analytic processes generate liquid waste that is highly acidic and/or that contains a high level of chlorine have a high chloride level. In addition, a small quantity of organic waste is generated. This waste is segregated to minimize treatment needs. To meet these criteria, the waste is neutralized. If heavy metals are present in the liquid waste before neutralization, the metals are precipitated as hydroxides incident to the neutralization and are filtered from the solution. If the chlorine chloride content of the liquid is above 0.01 Molar, the chlorine chlorides may be removed through silver nitrate precipitation. Therefore, waste solutions are not expected to be ignitable, reactive, or incompatible when transferred to the SAL tank.

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. Ikenberry
A. K. Ikenberry

12-11-98
Date

R.F. Christensen
R.F. Christensen

1/5/99
Date

A. B. Stone
A. B. Stone

2/4/99
Date

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Hanford Facility RCRA Permit Modification Notification Form

Unit: 325 Hazardous Waste Treatment Unit		Permit Part & Chapter: Part III, Chapter 6 and Attachment 36 [Section 4]			
<u>Description of Modification:</u> Section 4.2.2.2.2, page 4-21, lines 13-30: 4.2.2.2.2 Requirements for Secondary Containment and Leak Detection The secondary containment has been designed to prevent any migration of waste or accumulated liquid from the tank system to the soil, groundwater, or surface water. The secondary containment system will be able to detect and collect releases of accumulated liquids. Remote television cameras will provide a surveillance system for the tank, ancillary equipment, and general viewing of the tank pit. Viewing screens and controls will be located in the control room. The following is the system description based on conceptual design. <u>Materials of construction.</u> The tank and components will be constructed of 316L stainless steel; this material is compatible with the aqueous waste being discharged to the tank. The waste has a pH between 7 and 12, and the chloride ion concentration averages less than 0.01 Molar. <u>Strength of materials.</u> The system design will be reviewed by an independent, qualified, registered professional engineer to verify that the strength of materials is adequate and that the tank can withstand the stress of daily operation before operations begin. <u>Strength of foundation.</u> The system design will be reviewed by an independent, qualified, registered professional engineer to verify that the strength of the tank mounting and foundation is adequate to withstand the <u>Design Basis Earthquake (DBE)</u> before operations begin. This ensures that the foundation is capable of providing support to the tank and will resist settlement, compression, or uplift.					
Modification Class: ¹²³		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.					
<u>Enter wording of the modification from WAC 173-303-830, Appendix I citation:</u> 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> 12-11-98		<i>R.F. Christensen</i> 1/5/99		<i>A. B. Stone</i> 2/4/99	
A. K. Ikenberry Date		R.F. Christensen Date		A. B. Stone 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: 325 Hazardous Waste Treatment Unit		Permit Part & Chapter: Part III, Chapter 6 and Attachment 36 [Section 4]			
<u>Description of Modification:</u>					
Section 4.2.2.3, page 4-23, lines 3-16:					
4.2.2.3 Tank Management Practices [D-2d]					
Control panels will be located in multiple locations with the primary primary panel in the control room is adjacent to the tank pit. Other Liquid level monitoring panels will be located in Room 601, truck lock, Room 201, Room 527 and the operator's office. The tank will be monitored with two liquid level instruments, and meters/indicating lights will be provided in all control panels. Several of the panels have high liquid level alarms. These alarms will be audible or visual, depending on location.					
Modification Class: ¹²³		Class 1	Class ¹	Class 2	Class 3
Please check one of the Classes:		X			
Relevant WAC 173-303-830, Appendix I Modification: A.3.					
<u>Enter wording of the modification from WAC 173-303-830, Appendix I citation:</u>					
A. General Permit Provisions					
3. Equipment replacement or upgrading.					
Submitted by Co-Operator:		Reviewed by RL Program Office:		Reviewed by Ecology:	
<i>A. K. Ikenberry</i> 12-11-93		<i>R.F. Christensen</i> 1/5/99		<i>A. B. Stone</i> 2/4/99	
A. K. Ikenberry Date		R.F. Christensen Date		A. B. Stone Date	

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Hanford Facility RCRA Permit Modification Notification Form

Unit: 325 Hazardous Waste Treatment Unit		Permit Part & Chapter: Part III, Chapter 6 and Attachment 36 [Section 4]			
<u>Description of Modification:</u> Section 4.2.2.3, page 4-23, lines 28-32 4.2.2.3 Tank Management Practices [D-2d] Liquid waste will be transported from 325 Building to DSTs using the cask system. The existing 325A truck lock in 325 will be has been modified to handle the cask system. There will be a transfer line with secondary containment in 325 Building between the tank and the truck lock. A pump or other means will be used to transfer the waste from the RLWS tank to the truck lock. An elevated platform in the truck lock will be used for access to the top of the cask.					
Modification Class: ¹²³ Please check one of the Classes:		Class 1 X	Class ¹	Class 2	Class 3
Relevant WAC 173-303-830, Appendix I Modification: A.1.					
<u>Enter wording of the modification from WAC 173-303-830. Appendix I citation:</u> A. General Permit Provisions 1. Administrative and Informational changes.					
Submitted by Co-Operator: <i>A. K. Ikenberry</i> 12-11-99 A. K. Ikenberry Date		Reviewed by RL Program Office: <i>R.F. Christensen</i> 1/5/99 R.F. Christensen Date		Reviewed by Ecology: <i>A. B. Stone</i> 2/4/99 A. B. Stone Date	

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Hanford Facility RCRA Permit Modification Notification Form

Unit: 325 Hazardous Waste Treatment Unit		Permit Part & Chapter: Part III, Chapter 6 and Attachment 36 [Section 4]		
<u>Description of Modification:</u>				
Section 4.2.2.5, page 4-24, lines 9-32				
4.2.2.5 Ignitable, Reactive, and Incompatible Waste [D-2h]				
<p>Many different types of samples and waste materials will be brought to the SAL hot cells, the HWTU, and the other 325 hot cells that are not part of these units for analytical or research activities. These samples are accompanied by an internal PNNL documentation form that provides waste characterization information from the sample generating unit. Chemical characterization provided in these forms is based on previous chemical analysis or process knowledge. The hazard potential includes exposure to radiation, corrosive chemicals, and hazardous chemicals.</p> <p>The treatment capabilities of the SAL and the HWTU vary. The SAL is equipped to neutralize <u>the pH of corrosives</u> and precipitate metals and <u>chlorine chloride ions</u>. The HWTU has limited treatment capabilities and no agitation mechanisms. Prior to transferring wastes to the RLWS system, the wastes are evaluated to ensure compatibility with the system and to preclude introduction of flammable or reactive waste in order to protect the integrity of the new RLWS tank. The RLWS load out tank system will be equipped with treatment capabilities including neutralization and <u>chlorine chloride</u> removal. These treatment systems will include chemical additive tanks and a tank agitator.</p>				
Modification Class: ¹²³	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.				
<u>Enter wording of the modification from WAC 173-303-830, Appendix I citation:</u>				
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> 12-11-98	<i>R.F. Christensen</i> 1/5/99	<i>A. B. Stone</i> 2/4/99		
A. K. Ikenberry Date	R.F. Christensen Date	A. B. Stone Date		

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Hanford Facility RCRA Permit Modification Notification Form					
Unit: 325 Hazardous Waste Treatment Unit		Permit Part & Chapter: Part III, Chapter 6 and Attachment 36 [Section 4]			
<u>Description of Modification:</u>					
Section 4.3, page 4-24, lines 33-36:					
4.3 Air Emissions Control					
The air emissions standards on 40 CFR 265, Subpart AA and BB, do not apply to any part of the 325 HWTUs. Containers in the 325 HWTUs are primarily managed as mixed waste. Such containers are exempt from 40 CFR 264, Subpart CC by 40 CFR 254.1080(6).					
Modification Class: ¹²³		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.					
<u>Enter wording of the modification from WAC 173-303-830, Appendix I citation:</u>					
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> (12/1/99)		<i>R.F. Christensen</i> 4/5/99		<i>A.B. Stone</i> 2/4/99	
A. K. Ikenberry Date		R.F. Christensen Date		A.B. Stone Date	

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Hanford Facility RCRA Permit Modification Notification Form

Unit: 325 Hazardous Waste Treatment Unit	Permit Part & Chapter: Part III, Chapter 6 and Attachment 36 [Section 4]
--	---

Description of Modification:

Table 4-1, page T4-1:

Add **Waste** to the column titled Capacity. Now should read Waste Capacity.

Modification Class: ¹²³	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:

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> 12-11-98	<i>R.F. Christensen</i> 4/5/99	<i>A. B. Stone</i> 2/4/99
A. K. Ikenberry Date	R.F. Christensen Date	A. B. Stone Date

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Hanford Facility RCRA Permit Modification Notification Form

Unit: 325 Hazardous Waste Treatment Unit	Permit Part & Chapter: Part III, Chapter 6 and Attachment 36 [Section 6]
--	---

Description of Modification:

Section 6.2, page 6-2, lines 5-13:

6.2 INSPECTION PLAN [F-2]

The purpose and intent of implementing inspection procedures at the 325 HWTUs are to prevent malfunctions, deterioration, operator errors, and/or discharges that might cause or lead to the release of regulated waste to the environment or threats to human health. A system of daily, weekly, ~~and~~ monthly, ~~quarterly, once every four months, and annual~~ inspections involving various PNNL departments and levels of management has been implemented at the 325 HWTUs. The Hanford Facility 300 Area Fire Department performs a ~~once every four months~~ inspection of the fire suppressant and notification systems and annually an inspection of the sprinkler systems.

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>Alex K. Ikenberry</i> <i>12-11-98</i> A. K. Ikenberry Date	Reviewed by RL Program Office: <i>R.F. Christensen</i> <i>1/5/99</i> R.F. Christensen Date	Reviewed by Ecology: <i>A.B. Stone</i> <i>11 Feb 99</i> A/B. Stone Date
--	---	--

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Hanford Facility RCRA Permit Modification Notification Form

Unit: 325 Hazardous Waste Treatment Unit	Permit Part & Chapter: Part III, Chapter 6 and Attachment 36 [Section 6]
--	---

Description of Modification:

Section 6.3.1.1, page 6-7, lines 21-34:

6.3.1.1 Internal Communications [F-3a(1)]

Hazardous Waste Treatment Unit

There are two fire alarm pull boxes in the vicinity of the HWTU; one is located in the hall north of the entrance to Room 528, and one is in the hallway just east of the south entrance to Room 520. Rooms 520 and 528 are provided with smoke detectors that, upon activation, initiate the fire alarm system and close dampers between the two rooms and the corridor. Heat detectors are provided in the glovebox in Room 528. There are two fire alarm bells just outside the HWTU. These fire alarm bells are located north of the entrance to Room 528 in the hall and east of the south entrance to Room 520 in the hall.

Additionally, a fire alarm strobe is installed in Room 528 ~~because of the elevated noise level during compaction operations~~. The locations of the fire pull boxes are shown in Figure 6.1.

~~A constant air monitoring system is located in Room 528 and is in use only during compaction activities.~~ An alpha radiation monitor, located near the glovebox in Room 528, is continually in use. When airborne contaminants or alpha radiation is detected, each of these monitors sounds a local alarm.

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: <i>Alex K. Ikenberry</i> 12-11-98 A. K. Ikenberry Date	Reviewed by RL Program Office: <i>R.F. Christensen</i> 1/5/99 R.F. Christensen Date	Reviewed by Ecology: <i>A.B. Stone</i> 2/4/99 A. B. Stone Date
--	---	--

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Hanford Facility RCRA Permit Modification Notification Form

Unit: 325 Hazardous Waste Treatment Unit		Permit Part & Chapter: Part III, Chapter 6 and Attachment 36 [Section 6]			
<u>Description of Modification:</u>					
Section 6.3.1.3, pages 6-9, lines 22-31:					
6.3.1.3 Emergency Equipment [F-3a(3)]					
Mercury spill kits are capable of cleaning up to 25 milliliter of spilled mercury. Acid, caustic, and solvent spill kits contain the materials necessary to clean up small spills of acids, bases, and organic solvents. A solvent absorbent kit in Room 527 contains materials necessary for response to small spills of organic solvents. The absorbent kits in the SAL contain absorbent pads and other materials needed to temporarily contain and clean up small chemical spills.					
Modification Class: ¹²³		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.					
<u>Enter wording of the modification from WAC 173-303-830, Appendix I citation:</u>					
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> <u>12-11-98</u>		<i>R.F. Christensen</i> <u>1/5/99</u>		<i>A. B. Stone</i> <u>2/4/99</u>	
A. K. Ikenberry Date		R.F. Christensen Date		A. B. Stone Date	

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Hanford Facility RCRA Permit Modification Notification Form

Unit: 325 Hazardous Waste Treatment Unit	Permit Part & Chapter: Part III, Chapter 6 and Attachment 36 [Section 6]
--	---

Description of Modification:

Section 6.3.1.3, page 6-9, lines 22-31:

6.3.1.2 Emergency Equipment [F-3a(3)]

Hazardous Waste Treatment Unit

Two portable 4.5 kilogram ABC fire extinguishers are available adjacent to the HWTU as shown in Figure 6.1. The portable fire extinguishers are located in the hall between the entrances to Rooms 528 and 520 and in the hall south of the south entrance to Room 520.

Additionally, for decontamination of high levels of radioactivity, an emergency shower is located in Room 601, which is in close proximity to the HWTU. ~~The~~ For chemical contamination needs, another emergency shower is located in the hall between the entrances to Rooms 520 and 528 (Figure 6.2). An emergency eye wash is located in Rooms 520 and 528. Any contaminated water will be contained and cleaned up in accordance with the 325 HWTU contingency plan. Effluents are managed via the RPS or RLWS.

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> 12-11-99	<i>R.F. Christensen</i> 1/5/99	<i>A. B. Stone</i> 2/4/99
A. K. Ikenberry Date	R.F. Christensen Date	A. B. Stone Date

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Hanford Facility RCRA Permit Modification Notification Form

Unit: 325 Hazardous Waste Treatment Unit		Permit Part & Chapter: Part III, Chapter 6 and Attachment 36 [Section 6]		
Description of Modification:				
Section 6.4.5, page 6-12, lines 31-39:				
6.4.5 Personal Protection Equipment [F-4e]				
Hazardous Waste Treatment Unit				
Laboratory coats (Rooms 520 and 528) (325 Building – Mens/womens change room)				
shoe covers (Rooms 520 and 528) (325 Building – Mens/womens change room)				
surgeon gloves (Rooms 520 and 528)				
chemical-resistant gloves (Rooms 520 and 528)				
chemical-resistant aprons (Rooms 520 and 528)				
face shields (Rooms 520 and 528)				
hard hats (Room 528)				
safety glasses (Rooms 520 and 528).				
Modification Class: ¹²³	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:				
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	<i>R.F. Christensen</i> R.F. Christensen	<i>A. B. Stone</i> A. B. Stone		
12-11-98 Date	1/5/99 Date	2/4/99 Date		

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Hanford Facility RCRA Permit Modification Notification Form

Unit: 325 Hazardous Waste Treatment Unit		Permit Part & Chapter: Part III, Chapter 6 and Attachment 36 [Section 6]		
<u>Description of Modification:</u>				
Section 6.4.5, page 6-13, lines 5-13:				
6.4.5 Personal Protection Equipment [F-4e]				
<u>Radioactive Liquid Waste System Load Out Tank</u>				
Laboratory coats (Control Room) (325 Building – Mens/womens change room)				
shoe covers (Control Room) (325 Building – Mens/womens change room)				
surgeon gloves (Control Room)				
chemical-resistant gloves (Control Room)				
chemical-resistant aprons (Control Room)				
face shields (Control Room)				
hard hats (Control Room)				
safety glasses (Control Room).				
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.				
<u>Enter wording of the modification from WAC 173-303-830, Appendix I citation:</u>				
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> 12/1/99 A. K. Ikenberry Date	<i>R.F. Christensen</i> 1/5/99 R.F. Christensen Date		<i>A. B. Stone</i> 2/4/99 A. B. Stone Date	

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Hanford Facility RCRA Permit Modification Notification Form

Unit: 325 Hazardous Waste Treatment Unit		Permit Part & Chapter: Part III, Chapter 6 and Attachment 36 [Section 6]		
<u>Description of Modification:</u>				
Section 6.5.2, page 6-15, lines 28-33:				
6.5.2 Precautions for Handling Ignitable or Reactive Waste and Mixing of Incompatible Wastes [F-5b]				
The potential for waste ignition or reaction at the 325 HWTUs also is minimized through storage restrictions on hazardous materials quantities. The storage restrictions defined in the Uniform Building Code for Class B Occupancy apply to the 325 HWTUs (ICBO 1991). The weekly inspection of the 325 HWTUs includes checking to see if waste inventories are below these limits. These inspections are documented in the operating records that (includes the weekly inspection form) for each of the 325 HWTUs.				
In the unlikely event the fire sprinkler system in Rooms 520 and 528 is activated, the resulting run-off will be contained in the fire water collection tank located in the basement of the 325 Building. This tank is described in detail in Chapter 4.0, Section 4.1.4.1.				
Modification Class: ¹²³	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.				
<u>Enter wording of the modification from WAC 173-303-830, Appendix I citation:</u>				
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> 12-11-98	<i>R.F. Christensen</i> 1/5/99		<i>A. B. Stone</i> 2/4/99	
A. K. Ikenberry Date	R.F. Christensen Date		A. B. Stone Date	

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Hanford Facility RCRA Permit Modification Notification Form

Unit: 325 Hazardous Waste Treatment Unit		Permit Part & Chapter: Part III, Chapter 6 and Attachment 36 [Section 6]		
<u>Description of Modification:</u>				
Section 6.5.3, page 6-16, lines 1-8:				
6.5.3 Management of Incompatible Wastes in Tank Systems [F-5b(1)]				
Waste discharged to the SAL tank from the hot cells typically consists of the same type of waste managed in the hot cells. Prior to discharge to the SAL tank, waste could may be analyzed for pH, anions, metals, radionuclides, and total organic carbon to determine if the waste meets the waste acceptance criteria for the radioactive liquid waste system (RLWS). Sampling and analysis would be used if sufficient process knowledge is not available to characterize the waste for RLWS waste acceptance criteria purposes. The waste is treated in the SAL tank, if necessary.				
Modification Class: ¹²³	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.				
<u>Enter wording of the modification from WAC 173-303-830, Appendix I citation:</u>				
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> 12-11-99	<i>RF Christensen</i> 1/5/99	<i>A. B. Stone</i> 2/4/99		
A. K. Ikenberry Date	R.F. Christensen Date	A. B. Stone Date		

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Hanford Facility RCRA Permit Modification Notification Form

Unit: 325 Hazardous Waste Treatment Unit	Permit Part & Chapter: Part III, Chapter 6 and Attachment 36 [Section 6]
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Description of Modification:

Table 6.1, page T6-1:

Column 2 – Remedial Actions; second block add the statement: or provide secondary containment for existing containers that hold liquid waste.

Modification Class: ¹²³	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:

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> 12-11-98 A. K. Ikenberry Date	<i>R.F. Christensen</i> 1/5/99 R.F. Christensen Date	<i>A. B. Stone</i> 11 Feb 99 A. B. Stone Date

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Hanford Facility RCRA Permit Modification Notification Form

Unit: 325 Hazardous Waste Treatment Unit		Permit Part & Chapter: Part III, Chapter 6 and Attachment 36, Appendix 3A			
<u>Description of Modification:</u>					
Appendix 3A, Table 2.1, page 2-5:					
Table 2.1. Summary of Test Parameters, Rationales, and Methods					
Containers Chlorides Halides					
Tanks Chlorides Halides					
Modification Class: ¹²³		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.					
<u>Enter wording of the modification from WAC 173-303-830, Appendix I citation:</u>					
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> 12-11-98		<i>R.F. Christensen</i> 1/5/99		<i>A. B. Stone</i> 2/4/99	
A. K. Ikenberry Date		R.F. Christensen Date		A. B. Stone Date	

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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:
325 Hazardous Waste Treatment Unit

Permit Part & Chapter:
Part III, Chapter 6 and Attachment 36,
Appendix 3A

Description of Modification:

Appendix 3A, Section 4.4, page 4-5, lines 26-31:

4.4 FIELD ANALYTICAL METHODS

Analytical methods employed to verify or characterize waste are of two types: fingerprint analysis and laboratory analysis. Fingerprint analysis is used primarily to verify waste characteristics of waste received from offsite non-PNNL generators.

Modification Class: ¹²³	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:

- 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> 12-11-99 A. K. Ikenberry Date	<i>RF Christensen</i> 1/5/99 R.F. Christensen Date	<i>A. B. Stone</i> 11 Feb 99 A. B. Stone 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: 325 Hazardous Waste Treatment Unit		Permit Part & Chapter: Part III, Chapter 6 and Attachment 36, Appendix 3A		
<u>Description of Modification:</u>				
Appendix 3A, Section 4.5.3, page 4-7, lines 6-18:				
4.5.3 Frequency of Analysis				
Before acceptance and during the waste-characterization and analysis process, all LDR characterizations and designations are made. This The characterization and analysis process is performed when a CDRR is submitted for waste pick-up, unless there is insufficient data or if the waste stream has changed. Instances where sampling and laboratory analysis may be required to determine accurate LDR determinations include the following:				
<ul style="list-style-type: none"> ▪ When waste-management personnel have reason to suspect a change in the waste based on inconsistencies in the waste-tracking form, packaging, or labeling of the waste when the information submitted previously by a generator does not match the characteristics of the waste that was submitted when the offsite TSD facility rejects the waste because the fingerprint samples are inconsistent with the waste profile provided by 325 HWTUs, which was established using generator information. 				
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.				
<u>Enter wording of the modification from WAC 173-303-830, Appendix I citation:</u>				
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> 12-11-99	<i>R.F. Christensen</i> 1/5/99	<i>A. B. Stone</i> 2/4/99		
A. K. Ikenberry Date	R.F. Christensen Date	A. B. Stone Date		

¹Class 1 modifications requiring prior Agency approval.

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Hanford Facility RCRA Permit Modification Notification Form

Unit: 325 Hazardous Waste Treatment Unit		Permit Part & Chapter: Part III, Chapter 6 and Attachment 36, Appendix 3A			
<u>Description of Modification:</u>					
Appendix 3A, Section 6.0, Page 6-2, line 1-8:					
Exceptions to physical screening for verification are:					
<ul style="list-style-type: none"> Shielded, classified, and remote-handled dangerous waste are not required to be physically screened; however, 325 HWTUs staff must perform a more rigorous documentation review and obtain the raw data to characterize the waste (< 1% of current waste receipts). 					
Wastes which cannot be verified at the 325 HWTUs must be verified by the generator (e.g., large components, containers which cannot be opened, are greater than 20 mrem/h, contain greater than 10 nCi/gram of transuranic radionuclides radionuclides , or will not fit into the NDE unit).					
Modification Class: ¹²³		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.					
<u>Enter wording of the modification from WAC 173-303-830, Appendix I citation:</u>					
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> 12-11-98		<i>R.F. Christensen</i> 1/5/99		<i>A. B. Stone</i> 2/4/99	
A. K. Ikenberry Date		R.F. Christensen Date		A. B. Stone Date	

¹Class 1 modifications requiring prior Agency approval.

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Hanford Facility RCRA Permit Modification Notification Form

Unit: 325 Hazardous Waste Treatment Unit		Permit Part & Chapter: Part III, Chapter 6 and Attachment 36, Appendix 8A		
<u>Description of Modification:</u>				
Appendix 8A, Section 8.1.1.3, APP 8A-3, lines 30-34:				
8.1.1.3 325 Building Emergency Director				
The 325 Building BED has responsibility for directing emergency activities for the 325 Building, and serves as the Emergency Coordinator as described in WAC-173-303-360. This person will receive, in the event of an emergency, additional hazard information from the HWTU Activity Manager and the SAL Technical Group Leader.				
Modification Class: ¹²³	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.				
<u>Enter wording of the modification from WAC 173-303-830, Appendix I citation:</u>				
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> 12-11-98 A. K. Ikenberry Date	<i>R.F. Christensen</i> 1/5/99 R.F. Christensen Date		<i>A.B. Stone</i> 2/4/99 A. B. Stone Date	

¹Class 1 modifications requiring prior Agency approval.

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Hanford Facility RCRA Permit Modification Notification Form

Unit: 325 Hazardous Waste Treatment Unit		Permit Part & Chapter: Part III, Chapter 6 and Attachment 36, Appendix 8A		
<u>Description of Modification:</u>				
Appendix 8A, Section 8.1.2, page 8A-3, lines 35-40:				
8.1.2 Training Content, Frequency, and Techniques [H-1b]				
A list of required courses and associated training frequencies are provided in Table 1, and a brief description of these courses is processed in Sections 8.1.4 and 8.1.5. Personnel training could consist of both classroom and on-the-job training. Equivalent training that meets regulatory requirements could be taken in lieu of training identified in Table 1, with approval from the HWTU Activity Manager or SAL Technical Group Leader .				
Modification Class: ¹²³	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.				
<u>Enter wording of the modification from WAC 173-303-830, Appendix I citation:</u>				
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> 12-11-98	<i>R.F. Christensen</i> 1/5/99	<i>Alex Stone</i> 2/4/99		
A. K. Ikenberry Date	R.F. Christensen Date	A. B. Stone Date		

¹Class 1 modifications requiring prior Agency approval.

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**Hanford Facility RCRA Permit Modification Notification Forms
for
Part III, Chapter 2 and Attachment 18
305-B Storage Facility**

Page 1 of 10

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Page 3 of 10: Section 4.1.1.6.4, page 4-5, lines 41-46
Page 4 of 10: Section 4.1.1.6.4., page 4-6, lines 5-20
Page 5 of 10: Figure 4-2, page 4-8, lines 23-27
Page 6 of 10: Figure 4-3, page 4-9, line 40
Page 7 of 10: Figure 4-4, page 4-11
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Page 9 of 10: Section 4.3.2, page 4-23, lines 20-40
Page 10 of 10: Figure 6-2, Page 6-5

Hanford Facility RCRA Permit Modification Notification Form

Unit:
305-B Storage Facility

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

Description of Modification:

Section 4.1.1.6.3, page 4-5, lines 32-39:

4.1.1.6.3. Alkaline, Washington State Criteria Wastes, Organic Peroxides, and Non-Regulated Waste Cell.
The alkaline, Washington State Criteria waste, and non-regulated waste cell (cell 3) is located South of 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. A diagram of this cell is provided in Figure 4-3.

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> 12-11-99 A. K. Ikenberry Date	<i>R.F. Christensen</i> 1/5/99 R.F. Christensen Date	<i>A. B. Stone</i> 1/25/99 A. B. Stone 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.]				
<u>Description of Modification:</u>					
Section 4.1.1.6.4, page 4-5, lines 41-46:					
<p>4.1.1.6.4 Flammable-Organics Cell. The flammable-organics cell (cell 4) is located south of the alkaline Washington State Criteria 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.</p>					
Modification Class: ¹²³	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.					
<u>Enter wording of the modification from WAC 173-303-830, Appendix I citation:</u>					
A. General Permit Provisions:					
1. Administrative and informational changes.					
Submitted by Co-Operator:					
<i>Alice K. Ikenberry</i> A. K. Ikenberry	12-11-98 Date	Reviewed by RL Program Office: <i>R.F. Christensen</i> R.F. Christensen	1/5/99 Date	Reviewed by Ecology: <i>Michael P. Davis</i> A. B. Stone	1/25/99 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 4.1.1.6.4.]

Description of Modification:

Section 4.1.1.6.4., page 4-6, lines 5-20:

Total ignitable Waste Storage capacity of the 305-B highbay, including the organics cell, Cell 5, Ignitable drum storage area, and highbay storage area is limited by the following UBC restrictions for Class B occupancy:

- Class 1A flammable liquids: 120 gallons
- Class 1B flammable liquids: 240 gallons
- Class 1C flammable liquids: 360 gallons
- Maximum Class 1A, 1B, and 1C at any one time: 480 gallons
- Maximum Class 1A, 1B and 1C stored in the Cell 8 self contained storage module for flammable liquids: 240 gallons
- Class 2 combustible liquids: 480 gallons
- Class 3A combustible liquids: 1320 gallons
- Combustible fibers, loose: 100 cubic feet
- Combustible fibers, baled: 1000 cubic feet
- Flammable gases in any one cylinder: 3000 cubic feet
- Liquefied flammable gases: 60 gallons

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>	<i>R.F. Christensen</i> 2/11/99	<i>A. B. Stone</i> 11Feb99
A. K. Ikenberry Date	R.F. Christensen Date	A. B. Stone 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
[Figure 4-2]

Description of Modification:

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

- 2A Poisons (P.G. ~~II~~ I and P.G. 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:

Reviewed by RL Program Office:

Reviewed by Ecology:

<i>A. K. Ikenberry</i>	<i>R.F. Christensen</i>	<i>Yves P. Davis</i>
12-11-98	1/5/99	1/25/99
Date	Date	Date
A. K. Ikenberry	R.F. Christensen	for A. B. Stone

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
[Figure 4.3]

Description of Modification:

Figure 4-3, page 4-9, line 40:



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>A. K. Ikenberry</i>	<i>R.F. Christensen</i>	<i>Michael P. Davis</i>
12-11-98	1/5/99	1/25/99
Date	Date	Date
A. K. Ikenberry	R.F. Christensen	for A. B. Stone

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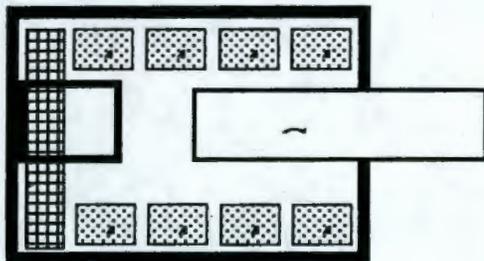
Hanford Facility RCRA Permit Modification Notification Form

Unit:
305-B Storage Facility

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

Description of Modification:

Figure 4-4, page 4-11:



- 4A Combustible Liquids (Large Cabinet)
- 4B Aerosols (Large Cabinet)
- 4C Flammable Liquids (Large Cabinet)
- 4D Flammable Solids (Dangerous When Wet) (Large Cabinet)
- 4E Flammable Solids (w/ water. Spontaneously Combustible) (Large Cabinet)
- 4F Floating Cabinet (Large Cabinet)

■ 15.24 cm W x 127 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> 12-11-98 A. K. Ikenberry Date	<i>R.F. Christensen</i> 1/5/99 R.F. Christensen Date	<i>Gretchen P. Davis</i> 1/25/99 A. B. Stone 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
[Figure 4-7]

Description of Modification:

Figure 4-7, Page 4-14:

In Cell 4: ~~Organic Flammable~~

In Cell 5: Added

HOOD

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:

A. K. Ikenberry 12-11-98
A. K. Ikenberry Date

R.F. Christensen 1/5/99
R.F. Christensen Date

Gretchen P. Davis 1/25/99
for A. B. Stone 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 4.3.2]			
<u>Description of Modification:</u>					
Section 4.3.2, page 4-23, lines 20-40:					
4.3.2 Management of Incompatible Wastes in Containers [D-3b]					
Section 6.5.2 describes procedures used at 305-B to determine the compatibility of dangerous wastes so that incompatible wastes are not stored together. Chemical wastes stored in 305-B are separated by compatibility, chemical makeup and hazard class and stored in areas having appropriate secondary containment, as described in Section 4.1.1.6.					
As shown in Figures 4-2 through 4-11, each storage area has individual storage configurations; secondary containment structures are provided to assure that incompatible materials will not commingle if spilled. Further segregation is provided by chemical storage cabinets located throughout the facility in various areas as shown in Figures 4-2 through 4-11. Cabinet types are noted in those figures and capacities described in Table 4-2. Incompatible wastes are never placed in the same container, or in unwashed containers that previously held incompatible waste.					
Compliance with WAC 173-303-395(1)(b) is assured utilizing the reactivity groupings given in A Method for Determining the Compatibility of Hazardous Waste (EPA 1980). Use of this system is described in the <u>Hazardous & Miscellaneous Waste Operations/Operations Manual</u> . This internal procedure is part of the 305-B Operating Record, as required by WAC 173-303-395(1)(c). Use of this system is described in "Procedures for Hazardous Waste and Radioactive Mixed Waste Management and Disposal at Pacific Northwest Laboratory." This internal procedure is part of the 305-B Operating Record, as required by WAC 173-303-395(1)(e).					
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.					
<u>Enter wording of the modification from WAC 173-303-830, Appendix I citation:</u>					
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> 12-11-99		<i>R.F. Christensen</i> 1/5/99		<i>Yvette P. Dennis</i> 1/25/99	
A. K. Ikenberry Date		R.F. Christensen Date		for A. B. Stone Date	

¹Class 1 modifications requiring prior Agency approval.

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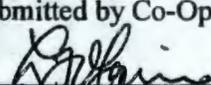
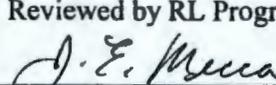
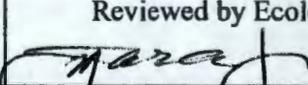
**Hanford Facility RCRA Permit Modification Notification Forms
for
Part III, Chapter 3 and Attachment 28
PUREX Storage Tunnels**

Page 1 of 3

Index

Page 2 of 3: Appendix 4A, page APP 4A-ii, lines 9-25

Page 3 of 3: RCRA Permit, Section III.3., page 42 of 76, lines 26-27

Hanford Facility RCRA Permit Modification Notification Form				
Unit: PUREX Storage Tunnels	Permit Part & Chapter: Part III, Chapter 3 and Attachment 28 Appendix 4A			
<u>Description of Modification:</u>				
Appendix 4A, page APP 4A-ii, lines 9-25:				
H-2-55590	Door and Hoist Details	Rev. 0		
H-2-55591	Door and Hoist Details	Rev. 0		
H-2-55592	Door and Hoist Details	Rev. 0		
H-2-55593	Electrical Details	Rev. 2		
H-2-55594	Shielding Door Fill and Drain Lines Arrangement: Disposal Facility for Failed Equipment, Rev. 2			
H-2-55599	Electrical Door Control Plan, Elementary Diagram and Miscellaneous Details: Disposal Facility for Failed PUREX Equipment, Rev. 2			
H-2-58134	Ventilation Details (sheets 1 and 2) Sheet 1, Rev. 2, Sheet 2, Rev. 6, Sheet 3, Rev. 0 Sheet 4, Rev. 0			
H-2-58175	PUREX Tunnel: As Built, May 1962, Rev. 2			
H-2-58193	Sump Details	Rev. 3		
H-2-58194	Sump Details	Rev. 4		
H-2-58195	Structural Sections and Details: Equipment Disposal - PUREX, Rev. 1			
H-2-58206	Sump Details	Rev. 3		
H-2-58208	Fan Details, Sheet 1, Rev. 6, Sheet 2, Rev. 1, Sheet 3, Rev. 1			
H-2-94756	Filter Details, Sheet 1, Rev. 1, Sheet 2, Rev. 1			
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.				
<u>Enter wording of the modification from WAC 173-303-830, Appendix I citation:</u>				
A. General Permit Provisions				
1. Administrative and Informational changes.				
Submitted by Co-Operator:	Reviewed by RL Program Office:		Reviewed by Ecology:	
 L. J. Olguin	 J. E. Mecca		 M. N. Jaraysi	
12/10/98 Date	1/7/99 Date		1/23/99 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:
PUREX Storage Tunnels

Permit Part & Chapter:
**Part III, Chapter 3 and Attachment 28
RCRA Permit, III.3.**

Description of Modification:

RCRA Permit, Section III.3., page 42 of 76, lines 26-27:

Appendix 4A Engineering Drawings, including Class 1 Modifications from quarter ending ~~June 30, 1997~~
December 31, 1998

Modification Class: ¹²³

Please check one of the Classes:

Class 1

Class¹ 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

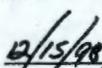
I. Administrative and Informational changes.

Submitted by Co-Operator:

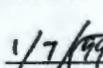
Reviewed by RL Program Office:

Reviewed by Ecology:

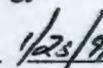

L. J. Oguin


Date


J. E. Mecca


Date


M. N. Jaraysi


Date

¹Class 1 modifications requiring prior Agency approval.

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