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**DRAFT REVISION
TO THE
HANFORD FACILITY WIDE DANGEROUS WASTE PERMIT**



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**NEW CHAPTERS TO BE ADDED TO PART V OF THE HANFORD FACILITY WIDE
DANGEROUS WASTE PERMIT**

*(Numbering will be added to the pages after final approval of the modification at
the conclusion of the Public Comment Period)*

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CHAPTER 4

Simulated High Level Waste Slurry Treatment and Storage Unit

The Simulated High Level Waste Slurry Treatment and Storage Unit (SHLWS) is an inactive storage and treatment unit which is currently undergoing permanent closure activities. This TSD unit was operated as a storage and treatment unit for simulated slurry as a test operation in connection with the grout project. This Chapter sets forth the closure requirements for this TSD unit.

V.4.A. COMPLIANCE WITH APPROVED CLOSURE PLAN

The Permittees shall comply with all the requirements set forth in the *SHLWS Closure Plan* (Plan), as found in Attachment 19, including the amendments specified in Condition V.4.B. Enforceable portions of the Plan are listed below (all subsections, figures, and tables included in these portions are also enforceable unless stated otherwise):

Section 1.2	Part A Permit Application
Section 1.3	Reference
Section 2.3	Description of the SHLWS T/S Unit/Physiography
Section 2.4	Location Information
Section 3.1	Characteristics of Untreated Waste
Section 3.2	Characteristics of Treated Waste
Section 3.3	References
Section 4.1	Reference
Section 5.1	Reference
Section 6.1	General Closure Requirements
Section 6.2	General Post-Closure Requirements
Section 6.3	Closure of Chemical, Physical, and Biological Treatment Units
Section 6.11	References
Appendix A	Sampling and Analysis Plan
Appendix B	Quality Assurance Project Plan

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V.4.B. AMENDMENTS TO THE APPROVED CLOSURE PLAN

V.4.B.a. A written notification stating closure has been and will continue to be conducted in accordance with the Plan, including the conditions of the Plan, shall be submitted to the Department within 30 days after the effective date of Revision 1 to this Permit.

V.4.B.b. The Permittees shall notify the Department, in writing, if at any time it is determined the clean closure levels specified in this plan are exceeded.

V.4.B.c. The Permittees and the independent, registered, professional engineer certification of closure shall be prepared and submitted to the Department by registered mail within 60 days of closure as described in the Plan. The Permittees shall continue to address the unit as a dangerous waste management unit until receipt of the Department's written notification stating the unit is accepted as clean closed.

V.4.B.d. The Permittees shall complete SHLWS closure activities 180 days after the effective date of Revision 1 to this Permit.

V.4.B.e. There is one remaining drum marked hazardous waste on the site. This drum must be held until the sampling results are received and analyzed. The dispositioning of the drum will be carried out based upon the final designation of the waste contained therein. The Department must be informed in writing of the final disposal method of this drum.

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CHAPTER 5

218-E-8 Borrow Pit Demolition Site

The 218-E-8 Borrow Pit Demolition Site (218 BPDS) is an inactive treatment unit which is currently undergoing permanent closure activities. This TSD unit was operated as an open burning/open detonation unit for dangerous wastes. This Chapter sets forth the closure requirements for this TSD unit.

V.5.A. COMPLIANCE WITH APPROVED CLOSURE PLAN

The permittees shall comply with all the requirements set forth in the *218-E-8 Borrow Pit Demolition Site Closure Plan* (Plan), as found in Attachment 20, including the amendments specified in condition V.5.B. Enforceable portions of the Plan are listed below (all subsections, figures, and tables included in these portions are also enforceable unless stated otherwise):

Part A Application

Section 2.2.2	Facility Description and General Provisions
Section 2.2.3	Description of 218-E-8 Borrow Pit Demolition Site
Section 2.4	Security Information
Chapter 3.0	Process Information
Chapter 4.0	Waste Characteristics
Chapter 5.0	Groundwater Monitoring
Chapter 6.0	Closure Strategy and Performance Standards
Chapter 7.0	Closure Activities
Chapter 8.0	Postclosure Plan
Appendix 4A	Toxicity Data
Appendix 7A	Quality Assurance Project Plan for Soil Sampling and Analysis for the 218-E-8 Borrow Pit Demolition Site
Appendix 7B	Training Course Descriptions
Appendix 7C	Sampling and Analysis Plan

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V.5.B. AMENDMENTS TO THE APPROVED CLOSURE PLAN

V.5.B.a. A written notification stating closure has begun and will be conducted in accordance with the Plan, including these additional conditions to the Plan, shall be submitted to the Department within 30 days after the effective date of Revision 1 to this Permit.

V.5.B.b. The results of all sampling required by this Plan shall be provided to the Department. This submittal shall include the raw analytical data, a summary of analytical results, a data validation package, and a narrative summary with conclusions.

V.5.B.c. The Department shall be provided, for review and approval, a sampling plan and the date of sampling for any sampling event not addressed in the Plan which provides data used to support 218 BPDS closure activities at least 30 days prior to initiating actual sampling activities. The results of this sampling shall be submitted to the Department. These submittals shall include the raw analytical data, a summary of analytical results, a data validation package, and a narrative summary with conclusions.

V.5.B.d. The Permittees shall notify the Department, in writing, if the action levels as defined in Section 6.1 of the Plan are exceeded. The notification shall either include a request to develop a phase two investigation to determine further sampling activities or remedial actions, or identify the interim measures to be taken at the 218 BPDS until closure activities are performed in conjunction with the 200-PO-6 Operable Unit.

V.5.B.e. The Permittees and the independent, registered, professional engineer certification of closure shall be prepared and submitted to the Department by registered mail within 60 days of closure, as described in Section 6.3.2 of the Plan. The Permittees shall continue to address the 218 BPDS as a dangerous waste management unit until receipt of the Department's written notification stating the 218 BPDS is accepted as clean closed.

V.5.B.f. The Permittees shall complete 218 BPDS closure activities within 180 days after the effective date of Revision 1 to this Permit.

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CHAPTER 6

200 West Area Ash Pit Demolition Site

The 200 West Area Ash Pit Demolition Site (200 APDS) is an inactive treatment unit which is currently undergoing permanent closure activities. This TSD unit was operated as an open burning/open detonation unit for dangerous wastes. This Chapter sets forth the closure requirements for this TSD unit.

V.6.A. COMPLIANCE WITH APPROVED CLOSURE PLAN

The permittees shall comply with all the requirements set forth in the *218-E-8 Borrow Pot Demolition Site Closure Plan (Plan)*, as found in Attachment 21, including the amendments specified in condition V.5.B. Enforceable portions of the Plan are listed below (all subsections, figures, and tables included in these portions are also enforceable unless stated otherwise):

Part A Application

Section 2.2.2 Facility Description and General Provisions

Section 2.2.3 Description of 200 West Area Ash Pit
Demolition Site

Section 2.4 Security Information

Chapter 3.0 Process Information

Chapter 4.0 Waste Characteristics

Chapter 5.0 Groundwater Monitoring

Chapter 6.0 Closure Strategy and Performance Standards

Chapter 7.0 Closure Activities

Chapter 8.0 Postclosure Plan

Appendix 4A Toxicity Data

Appendix 7A Quality Assurance Project Plan for Soil
Sampling and Analysis for the 200 West Area
Ash Pit Demolition Site

Appendix 7B Training Course Descriptions

Appendix 7C Sampling and Analysis Plan

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V.6.B. AMENDMENTS TO THE APPROVED CLOSURE PLAN

V.6.B.a. A written notification stating closure has begun and will be conducted in accordance with the Plan, including these additional conditions to the Plan, shall be submitted to the Department within 30 days after the effective date of Revision 1 to this Permit.

V.6.B.b. The results of all sampling required by this Plan shall be provided to the Department. This submittal shall include the raw analytical data, a summary of analytical results, a data validation package, and a narrative summary with conclusions.

V.6.B.c. The Department shall be provided, for review and approval, a sampling plan and the date of sampling for any sampling event not addressed in the Plan which provides data used to support 200 APDS closure activities at least 30 days prior to initiating actual sampling activities. The results of this sampling shall be submitted to the Department. These submittals shall include the raw analytical data, a summary of analytical results, a data validation package, and a narrative summary with conclusions.

V.6.B.d. The Permittees shall notify the Department, in writing, if the action levels as defined in Section 6.1 of the Plan are exceeded. The notification shall either include a request to develop a phase two investigation to determine further sampling activities, or remedial actions or identify the interim measures to be taken at the 200 APDS until closure activities are performed in conjunction with the 200-SS-2 Operable Unit.

V.6.B.e. The Permittees and the independent, registered, professional engineer certification of closure shall be prepared and submitted to the Department by registered mail within 60 days of closure, as described in Section 6.3.2 of the Plan. The Permittees shall continue to address the 200 APDS as a dangerous waste management unit until receipt of the Department's written notification stating the 200 APDS is accepted as clean closed.

V.6.B.f. The Permittees shall complete 200 APDS closure activities within 180 days after the effective date of Revision 1 to this Permit.

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CHAPTER 7

2101-M Pond

The 2101-M Pond is undergoing permanent closure activities. This unit was operated as a disposal unit for potentially dangerous waste. This chapter sets for the closure requirements for this TSD unit.

V.7.A. COMPLIANCE WITH APPROVED CLOSURE PLAN

The Permittees shall comply with all requirements set forth in the 2101-M Pond Closure Plan (Plan), found in Attachment 22, including the amendments specified in Condition V.7.B. Enforceable portions of the Plan are listed below (all subsections, figures, and tables included in these portions are also enforceable):

Appendix A-1	Part A Permit Application, Form 3
Section I-3	2101-M Pond Location and General Description
Section I-5	Security
Chapter A	Closure Performance Standards
Chapter B	Content of Closure Plan
Chapter C	Certification of Closure

V.7.B. AMENDMENTS TO THE APPROVED CLOSURE PLAN

- V.7.B.a. A written notification stating closure has been and will continue to be conducted in accordance with the Plan, including these conditions of the Plan, shall be submitted to the Department within 30 days after the effective date of Revision 1 to this Permit.
- V.7.B.b. The Permittees shall notify the Department, in writing, if at any time it is determined the clean closure levels specified in this plan are exceeded.
- V.7.B.c. The Permittees and the independent, registered, professional engineer certification of closure shall be prepared and submitted to the Department by registered mail within 60 days of closure, as described in the Plan. The Permittees shall continue to address the unit as a dangerous waste management unit until receipt of the Departments written notification stating the unit is accepted as clean closed.

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CHAPTER 8

216-B-3 Expansion Ponds

The 216-B-3 Expansion Ponds is undergoing permanent closure activities. This unit was operated as a treatment and disposal unit for dangerous waste. This chapter sets forth the closure requirements for this TSD unit.

V.8.A. COMPLIANCE WITH APPROVED CLOSURE PLAN

The Permittees shall comply with all requirements set forth in the 216-B-3 Expansion Ponds Closure Plan (Plan), found in Attachment 23, including the amendments specified in Condition V.8.B. Enforceable portions of the Plan are listed below (all subsection, figures, and tables included in these portions are also enforceable):

Part A Permit Application

Section 1.2 Closure Strategy

Chapter 2.0 Facility Description and Location Information

Chapter 5.0 Groundwater Monitoring

Chapter 6.0 Closure Performance Standards

Chapter 7.0 Closure Activities

Chapter 8.0 Postclosure Plan

V.8.B. AMENDMENTS TO THE APPROVED CLOSURE PLAN

V.8.B.a. A written notification stating closure has been and will continue to be conducted in accordance with the Plan, including these condition of the Plan, shall be submitted to the Department within 30 days after the effective date of Revision 1 to this Permit.

V.8.B.b. Groundwater monitoring will continue in accordance with B Pond System groundwater monitoring program. Quarterly and annual groundwater monitoring reports for the wells specified in the Plan shall continue to be submitted to the Department until closure of the 216-B-3 Main Pond is acknowledged by the Department in writing, or as specified otherwise in a postclosure permit.

V.8.B.c. The Permittees shall notify the Department, in writing, if at any time it is determined the clean closure levels specified in this plan are exceeded.

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- 1 V.8.B.d. The Permittees and the independent, registered, professional engineer
- 2 certification of closure shall be prepared and submitted to the
- 3 Department by registered mail with 60 days of closure as described in
- 4 the Plan. The Permittees shall continue to address the unit as a
- 5 dangerous waste management unit until receipt of the Department's
- 6 written notification stating the unit is accepted as clean closed.
- 7
- 8 V.8.B.e. The Permittees shall complete 216-B-3 expansion lobes closure
- 9 activities within 180 days after the effective date of Revision 1 to
- 10 this Permit.

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**FOUR LETTERS FROM WASHINGTON STATE DEPARTMENT OF ECOLOGY TO
UNITED STATES DEPARTMENT OF ENERGY ON THE COMPLETION OF THE REVIEW
OF THE CLOSURE PLANS FOR THE NEW FIVE UNITS BEING ADDED TO PART V OF
THE HANFORD FACILITY WIDE DANGEROUS WASTE PERMIT.**