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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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May 5, 1995

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Dr. William J. Madia, Director
Pacific Northwest Laboratory
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Dear Messrs. Wagoner, Trego, Nemecek, and Madia:

Enclosed please find an Errata Sheet for Class 1 Modifications initiated by the Washington State Department of Ecology (Ecology) for minor revisions to the Hanford Facility Wide Permit, Revision 1 (the Permit), and the Permit Applicability Matrix (Attachment 4), which was sent to you on April 28, 1995. These minor modifications are due to software complications. These modifications do not change the actual meaning or substance of the Permit or the matrix.

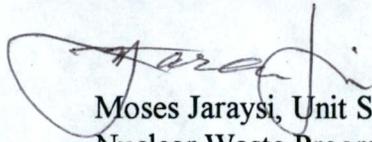
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Mr. John Wagoner, et. al.
May 5, 1995
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Ecology apologizes for any inconvenience this may have caused. If you have any questions, please call me at (509) 736-3016.

Sincerely,



Moses Jaraysi, Unit Supervisor
Nuclear Waste Program

MJ:mf
Enclosures

cc: Cliff Clark, USDOE
Daniel Duncan, EPA
Sue Price, WHC
Harold Tilden, PNL
L. A. Mehalik, BHI

Errata Sheet for Class 1 Modifications Initiated by the Department

1. Changes to the Hanford Facility Wide Permit, Revision 1

The following page changes must be made to the Hanford Facility Wide Permit, Revision 1:

Remove Pages 2 and 3 (Table of Contents), replace with revised Pages 2 and 3 (Table of Contents).

Remove Page 81, replace with revised Page 81.

Remove Page 86, replace with revised Page 86.

3. Changes to the Permit Applicability Matrix (Attachment 4)

Remove the Permit Applicability Matrix (Attachment 4) and replace with the revised Permit Applicability Matrix (Attachment 4).

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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 *200 West Area Ash Pit 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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HANFORD FACILITY WIDE PERMIT (REV. 1)

ATTACHMENT 4

PERMIT APPLICABILITY MATRIX

Updated April 24, 1995

PART I								
CONDITION		CATEGORY						QUALIFIERS
PART	TITLE	A	B ¹	C ²	D ³	E	F	
I.A.	EFFECT OF PERMIT							
I.A.1.a		*	*	*	*	*	*	
I.A.1.b		*	*	*	*	*	*	
I.A.2		*	*		*	*	*	
I.A.3	Coord. w/FFACO		*		*	*	*	
I.B.	PERSONAL & PROPERTY RIGHTS		*		*	*	*	
I.C.	PERMIT ACTIONS							
I.C.1.	Modification, Revocation, Reissuance, or Termination		*		*	*	*	
I.C.2.	Filing of a Request		*		*	*	*	
I.C.3.	Modifications		*		*	*	*	
I.D.	SEVERABILITY							
I.D.1.	Effect of Invalidation		*		*	*	*	
I.D.2.	Final Resolution		*		*	*	*	
I.E.	DUTIES & REQUIREMENTS							
I.E.1.	Duty to Comply		*		*	*	*	
I.E.2.	Compliance Not Constituting Defense		*		*	*	*	
I.E.3.	Duty to Reapply		*		*	*	*	

CATEGORIES ARE DEFINED AS FOLLOWS:

- A. Leased Land
- B. North Slope and ALE
- C. Interim Status TSD Units
- D. Areas Between TSDs (excluding A and B)
- E. TSD Unit Closures (in Part V)
- F. TSD Operating Units (in Part III)

- * - Condition applies to this category, as modified by applicable footnotes and qualifiers
- 1 - For Category B, Part I Conditions only apply if future TSD activities are begun on the North Slope or ALE
- 2 - For Category C, all Part I Conditions apply to activities subject to Conditions II.U. and II.V.
- 3 - For Category D, Part I Conditions only apply to activities subject to Conditions II.A., II.C. II.D.4., II.G., II.I., II.L.3., II.C., II.Q., II.S., II.T., and II.X.

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HANFORD FACILITY WIDE PERMIT (REV. 1)

ATTACHMENT 4

PERMIT APPLICABILITY MATRIX

Updated April 24, 1995

CONDITION		CATEGORY						QUALIFIERS
PART	TITLE	A	B ¹	C ²	D ³	E	F	
I.E.4.	Permit Expiration & Continuation		*		*	*	*	
I.E.5.	Need to Halt or Reduce Activity Not a Defense		*		*	*	*	
I.E.6.	Duty to Mitigate		*		*	*	*	
I.E.7.	Proper Operation & Maintenance		*			*	*	
I.E.8.	Duty to Provide Information		*		*	*	*	
I.E.9	Inspection & Entry		*		*	*	*	
I.E.10	Monitoring & Records							
I.E.10.a			*		*	*	*	
I.E.10.b			*		*	*	*	
I.E.10.c			*		*	*	*	
I.E.10.d			*		*	*	*	
I.E.10.e			*		*	*	*	
I.E.11.	Reporting Planned Changes		*			*	*	
I.E.12.	Certification of Construction or Modification		*				*	
I.E.13.	Anticipated Noncompliance		*		*	*	*	
I.E.14.	Transfer of Permits		*			*	*	
I.E.15.	Immediate Reporting							
I.E.15.a			*		*	*	*	
I.E.15.b			*		*	*	*	
I.E.15.c			*		*	*	*	
I.E.15.d			*		*	*	*	
I.E.15.e			*		*	*	*	

CATEGORIES ARE DEFINED AS FOLLOWS:

- | | |
|-----------------------------|---|
| A. Leased Land | D. Areas Between TSDs (excluding A and B) |
| B. North Slope and ALE | E. TSD Unit Closures (in Part V) |
| C. Interim Status TSD Units | F. TSD Operating Units (in Part III) |

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HANFORD FACILITY WIDE PERMIT (REV. 1)

ATTACHMENT 4

PERMIT APPLICABILITY MATRIX

Updated April 24, 1995

CONDITION		CATEGORY						QUALIFIERS
PART	TITLE	A	B ¹	C ²	D ³	E	F	
I.E.16	Written Reporting		*		*	*	*	
I.E.17	Manifest Discrepancy Report							
I.E.17.a			*			*	*	
I.E.17.b			*		*	*	*	
I.E.18.	Unmanifested Waste Report		*			*	*	
I.E.19.	Other Noncompliance		*		*	*	*	
I.E.20.	Other Information		*		*	*	*	
I.E.21.	Reports, Notifications & Submissions		*		*	*	*	
I.E.22.	Annual Report		*		*	*	*	
I.F.	SIGNATORY REQUIREMENT		*		*	*	*	
I.G.	CONFIDENTIAL INFORMATION		*		*	*	*	
I.H.	DOCUMENTS TO BE MAINTAINED AT FACILITY SITE		*		*	*	*	

PART II

CONDITION		CATEGORY						QUALIFIERS
PART	TITLE	A	B	C	D	E	F	
II.A.	FACILITY CONTINGENCY PLAN							
II.A.1.					*	*	*	For Category D, II.A. Conditions only apply to releases of hazardous substances which threaten human health or the environment.
II.A.2.					*	*	*	
II.A.3.					*	*	*	

CATEGORIES ARE DEFINED AS FOLLOWS:

- | | |
|-----------------------------|---|
| A. Leased Land | D. Areas Between TSDs (excluding A and B) |
| B. North Slope and ALE | E. TSD Unit Closures (in Part V) |
| C. Interim Status TSD Units | F. TSD Operating Units (in Part III) |

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HANFORD FACILITY WIDE PERMIT (REV. 1)

ATTACHMENT 4

PERMIT APPLICABILITY MATRIX

Updated April 24, 1995

CONDITION		CATEGORY						QUALIFIERS
PART	TITLE	A	B	C	D	E	F	
II.A.4.					*	*		
II.A.5.					*	*	*	
II.B.	PREPAREDNESS & PREVENTION							
II.B.1.						*	*	
II.B.2.						*	*	
II.B.3.						*	*	
II.B.4.						*	*	
II.C.	PERSONNEL TRAINING							
II.C.1.						*	*	
II.C.2.					*	*	*	
II.C.3.						*	*	
II.C.4.					*	*	*	For Category D, Condition II.C.4. will not apply to unrestricted (publicly accessible) areas
II.D.	WASTE ANALYSIS							
II.D.1.						*	*	
II.D.2.						*	*	
II.D.3.						*	*	
II.D.4.					*			
II.E.	QA/QC							
II.E.1.						*	*	

CATEGORIES ARE DEFINED AS FOLLOWS:

- | | |
|-----------------------------|---|
| A. Leased Land | D. Areas Between TSDs (excluding A and B) |
| B. North Slope and ALE | E. TSD Unit Closures (in Part V) |
| C. Interim Status TSD Units | F. TSD Operating Units (in Part III) |

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HANFORD FACILITY WIDE PERMIT (REV. 1)
ATTACHMENT 4
PERMIT APPLICABILITY MATRIX
Updated April 24, 1995

CONDITION		CATEGORY						QUALIFIERS
PART	TITLE	A	B	C	D	E	F	
II.E.2.						*	*	
II.E.3.						*	*	
II.E.4.						*	*	
II.E.5.						*	*	
II.F.	GW AND VADOSE ZONE MONITORING					*	*	
II.F.1.	Purgewater Management					*	*	
II.F.2.	Well Remed. & Abandonment							
II.F.2.a						*	*	
II.F.2.b						*	*	
II.F.2.c						*	*	
II.F.2.d						*	*	
II.F.3	Well Construction					*	*	
II.G.	SITING CRITERIA				*		*	For Category D, Condition II.G. only applies if a new TSD unit is to be sited.
II.H.	RECORDKEEPING & REPORTING							
II.H.1.	Cost Estimate for Facility Closure					*	*	
II.H.2.	Cost Est. for Postclosure Monitoring & Maintenance					*	*	
II.H.3.						*	*	

CATEGORIES ARE DEFINED AS FOLLOWS:

- | | |
|-----------------------------|---|
| A. Leased Land | D. Areas Between TSDs (excluding A and B) |
| B. North Slope and ALE | E. TSD Unit Closures (in Part V) |
| C. Interim Status TSD Units | F. TSD Operating Units (in Part III) |

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HANFORD FACILITY WIDE PERMIT (REV. 1)

ATTACHMENT 4

PERMIT APPLICABILITY MATRIX

Updated April 24, 1995

CONDITION		CATEGORY						QUALIFIERS
PART	TITLE	A	B	C	D	E	F	
II.I.	FACILITY OPERATING RECORD							
II.I.1.		*	*		*	*	*	<p>For Category D, II.I. Conditions only apply to activities subject to this Permit as defined by this matrix.</p> <p>For Category E, Condition applicability to be specified in Part V.</p> <p>Condition II.I. only applies to existing records and records prepared after the date of Permit issuance.</p>
II.I.1.a		*	*		*	*	*	
II.I.1.b							*	
II.I.1.c					*	*	*	
II.I.1.d						*	*	
II.I.1.e			*		*			
II.I.1.f					*	*	*	
II.I.1.g						*	*	
II.I.1.h	Condition Reserved							
II.I.1.i						*	*	
II.I.1.j						*	*	
II.I.1.k					*	*	*	
II.I.1.l	Condition Reserved							
II.I.1.m						*	*	
II.I.1.n					*	*	*	
II.I.1.o	Condition Reserved							
II.I.1.p			*		*	*	*	
II.I.1.q			*		*	*	*	

CATEGORIES ARE DEFINED AS FOLLOWS:

- A. Leased Land
- B. North Slope and ALE
- C. Interim Status TSD Units
- D. Areas Between TSDs (excluding A and B)
- E. TSD Unit Closures (in Part V)
- F. TSD Operating Units (in Part III)

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HANFORD FACILITY WIDE PERMIT (REV. 1)

ATTACHMENT 4

PERMIT APPLICABILITY MATRIX

Updated April 24, 1995

CONDITION		CATEGORY						QUALIFIERS
PART	TITLE	A	B	C	D	E	F	
II.I.1.r					*	*	*	
II.I.1.s					*	*	*	
II.I.1.t					*	*	*	
II.I.2.		*	*		*	*	*	
II.J.	FACILITY CLOSURE							
II.J.1.						*	*	
II.J.2.						*	*	
II.J.3.						*	*	
II.J.4.						*	*	
II.K.	SOIL/GW CLOSURE PERFORMANCE STANDARDS							
II.K.1.						*	*	
II.K.2.						*	*	
II.K.3.						*	*	
II.K.4.						*	*	
II.K.5.						*	*	
II.K.6.						*	*	
II.K.7.						*	*	
II.L.	DESIGN & OPERATION OF FACILITY							

CATEGORIES ARE DEFINED AS FOLLOWS:

- | | |
|-----------------------------|---|
| A. Leased Land | D. Areas Between TSDs (excluding A and B) |
| B. North Slope and ALE | E. TSD Unit Closures (in Part V) |
| C. Interim Status TSD Units | F. TSD Operating Units (in Part III) |

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HANFORD FACILITY WIDE PERMIT (REV. 1)

ATTACHMENT 4

PERMIT APPLICABILITY MATRIX

Updated April 24, 1995

CONDITION		CATEGORY						QUALIFIERS
PART	TITLE	A	B	C	D	E	F	
II.L.1.	Proper Design & Construction					*	*	Condition II.L.2. only applies to Category E if it is a landfill closure.
II.L.2.	Design Changes, Nonconformance, & As-Built Drawings					*	*	
II.L.3.	Facility Compliance				*	*	*	
II.M.	SECURITY					*	*	
II.N.	RECEIPT OF DANG. WASTES GENERATED OFF-SITE							
II.N.1.	Receipt of Off-Site Waste						*	
II.N.2.	Waste From Sources Outside the U.S.						*	
II.N.3.	Notice to Generator						*	
II.O.	GENERAL INSPECTION REQUIREMENTS							
II.O.1.					*			
II.O.2.					*			
II.O.3.					*			
II.P.	MANIFEST SYSTEM							
II.P.1.						*	*	
II.P.2.						*	*	
II.Q.	ON-SITE TRANSPORTATION							
II.Q.1.					*	*	*	
II.Q.2.					*	*	*	

CATEGORIES ARE DEFINED AS FOLLOWS:

- A. Leased Land
- B. North Slope and ALE
- C. Interim Status TSD Units

- D. Areas Between TSDs (excluding A and B)
- E. TSD Unit Closures (in Part V)
- F. TSD Operating Units (in Part III)

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HANFORD FACILITY WIDE PERMIT (REV. 1)

ATTACHMENT 4

PERMIT APPLICABILITY MATRIX

Updated April 24, 1995

CONDITION		CATEGORY						QUALIFIERS
PART	TITLE	A	B	C	D	E	F	
II.R.	EQUIVALENT MATERIALS							
II.R.1.						*	*	
II.R.2.						*	*	
II.R.3.						*	*	
II.S.	LAND DISPOSAL RESTRICTIONS				*	*	*	
II.T.	ACCESS & INFORMATION				*	*	*	
II.U.	MAPPING OF UNDERGROUND PIPING							
II.U.1.				*		*	*	
II.U.2.				*		*	*	
II.U.3.				*		*	*	
II.U.4.				*		*	*	
II.V.	MARKING OF UNDERGROUND PIPING			*		*	*	
II.W.	OTHER PERMITS AND/OR APPROVALS							
II.W.1.						*	*	
II.W.2.						*	*	
II.W.3.						*	*	
II.X.	SCHEDULE EXTENSIONS							

CATEGORIES ARE DEFINED AS FOLLOWS:

A. Leased Land

B. North Slope and ALE

C. Interim Status TSD Units

D. Areas Between TSDs (excluding A and B)

E. TSD Unit Closures (in Part V)

F. TSD Operating Units (in Part III)

HANFORD FACILITY WIDE PERMIT (REV. 1)

ATTACHMENT 4

PERMIT APPLICABILITY MATRIX

Updated April 24, 1995

CONDITION		CATEGORY						QUALIFIERS
PART	TITLE	A	B	C	D	E	F	
II.X.1.				*	*	*	*	Condition II.X. only applies to Category C if activities are subject to Conditions II.U. and II.V.
II.X.2.				*	*	*	*	Condition II.X. only applies to Category D if activities are subject to this Permit as defined by this matrix.
PARTS III, IV, and V								
III.	UNIT SPECIFIC CONDITIONS FOR FINAL STATUS OPERATIONS							
III.1.A.	616 NRDSF COMPLIANCE WITH APPROVED PERMIT APPLICATION						*	
III.1.B.	AMENDMENTS TO THE APPROVED PERMIT APPLICATION						*	
III.2.A.	305-B COMPLIANCE WITH APPROVED PERMIT APPLICATION						*	
III.2.B.	AMENDMENTS TO THE APPROVED PERMIT APPLICATION						*	
IV.	CORRECTIVE ACTIONS FOR PAST PRACTICE	*	*		*			
V.	UNIT SPECIFIC CONDITIONS FOR UNITS UNDERGOING CLOSURE							
V.1.A.	183-H BASINS COMPLIANCE WITH APPROVED CLOSURE PLAN					*		

CATEGORIES ARE DEFINED AS FOLLOWS:

A. Leased Land

B. North Slope and ALE

C. Interim Status TSD Units

D. Areas Between TSDs (excluding A and B)

E. TSD Unit Closures (in Part V)

F. TSD Operating Units (in Part III)

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HANFORD FACILITY WIDE PERMIT (REV. 1)

ATTACHMENT 4

PERMIT APPLICABILITY MATRIX

Updated April 24, 1995

CONDITION		CATEGORY						QUALIFIERS
PART	TITLE	A	B	C	D	E	F	
V.1.B.	AMENDMENTS TO THE APPROVED CLOSURE PLAN					*		
V.2.A.	300 ASE COMPLIANCE WITH APPROVED CLOSURE PLAN					*		
V.2.B.	AMENDMENTS TO THE APPROVED CLOSURE PLAN					*		
V.3.A.	2727-S COMPLIANCE WITH APPROVED CLOSURE PLAN					*		
V.3.B.	AMENDMENTS TO THE APPROVED CLOSURE PLAN					*		
V.4.A.	SHLWS COMPLIANCE WITH APPROVED CLOSURE PLAN					*		
V.4.B.	AMENDMENTS TO THE APPROVED CLOSURE PLAN					*		
V.5.A.	218 BPDS COMPLIANCE WITH APPROVED CLOSURE PLAN					*		
V.5.B.	AMENDMENTS TO THE APPROVED CLOSURE PLAN					*		
V.6.A.	200 APDS COMPLIANCE WITH APPROVED CLOSURE PLAN					*		
V.6.B.	AMENDMENTS TO THE APPROVED CLOSURE PLAN					*		
V.7.A.	2101-M POND COMPLIANCE WITH APPROVED CLOSURE PLAN					*		
V.7.B.	AMENDMENTS TO THE APPROVED CLOSURE PLAN					*		
V.8.A.	B PONDS COMPLIANCE WITH APPROVED CLOSURE PLAN					*		
V.8.B.	AMENDMENTS TO THE APPROVED CLOSURE PLAN					*		

CATEGORIES ARE DEFINED AS FOLLOWS:

- | | |
|-----------------------------|---|
| A. Leased Land | D. Areas Between TSDs (excluding A and B) |
| B. North Slope and ALE | E. TSD Unit Closures (in Part V) |
| C. Interim Status TSD Units | F. TSD Operating Units (in Part III) |

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Subject: QUARTERLY NOTIFICATION OF CLASS 1 MODIFICATIONS TO THE HANFORD FACILITY RESOURCE CONSERVATION AND RECOVERY ACT PERMIT (RCRA PERMIT), DANGEROUS WASTE PORTION (QUARTER ENDING MARCH 31, 1995)

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