



Confederated Tribes and Bands  
of the Yakama Nation ERWM

Established by the  
Treaty of June 9, 1855

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[0067982H]

August 15, 2017

Stephanie Schleif  
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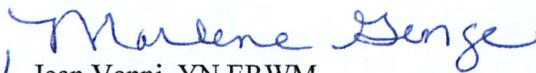
Re: *Class 2 Permit Modification to Part III, Operating Unit 3; LERF/ETF*

Dear Ms Schleif:

The Confederated Tribes and Bands of the Yakama Nation is a federally recognized sovereign pursuant of the Treaty of June 9, 1855 made with the United States of America (12 Stat. 951). The U.S. Department of Energy Hanford site was developed on land ceded by the Yakama Nation under the 1855 Treaty with the United States. The Yakama Nation retains reserved rights to this land under the Treaty. YN's position regarding the ultimate closure of all Hanford Site waste facilities is cleanup actions (with confirmatory sampling and analysis of surface and subsurface soils) to demonstrate attainment of cleanup levels protective of YN Tribal member health and welfare. With this in mind, we submit these comments.

We appreciate the opportunity to review these documents. We look forward to discussing our vision of cleanup and all our concerns with you further.

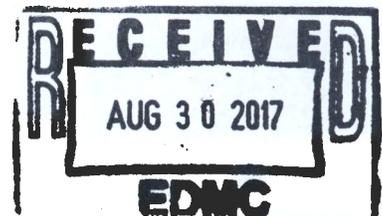
Sincerely,

  
f Jean Vanni, YN ERWM

cc:

**Administrative Record**  
Marlene George, YN ERWM  
Rose Longoria, YN ERWM Interim Program Manager  
Environmental Portal

Attachment: #1:



**Attachment #1:** YN ERWM program's comments on the proposed Class 2 Permit modification to the LERF/ETF permit:

**General:**

- The proposed modification includes the extension of closure for two tanks associated with the 2025-ED facility. This is allowable; however, the length of time requested is not justifiable. During the public meeting, the Permittee indicated steps have been taken to *isolate* the tanks, and cited 'financial burdens' as the primary rationale for not closing the tanks at this time. This is not a defensible reason for non-closure of these tanks per WAC 173-303-610(4). Closure of these tanks is not incompatible with the continued operation of the site. YN requests this modification to extend closure these two tanks (59-A-TK-109 and 59A-TK-117) be denied and the Permittee required to comply with WAC 173-303-610(4) within 90 days.
- With tank removals, YN asks that total secondary containment area identified on the Part A be verified to ensure compliance with WAC 173-303 and updates made as necessary to design capacities, etc.
- YN requests edits to LERF/ETF's Addenda and Glossary to include definition of term *flow-equalization*. Verify and confirm that use of this terminology and process does not result in non-compliant operation of the facilities.
- YN requests there is consideration of our comments submitted on the draft Rev 9 permit for the LERF/ETF facilities (e.g., the additional Permit Conditions). YN requests Ecology take this opportunity to make needed additional changes to the Permit Conditions and Addenda through Ecology's issue of the Permit. Our comments are attached for your convenience.
- Additionally, although not a consensus product YN requests consideration of the points from Advice # 262 and Addendum 1 COTW/HAB on the draft Permit, Rev 9 for LERF/ETF RCRA TSDs. They are as follows:

Advice # 262:

- The Board advises Ecology to include in unit-specific Permit conditions requirements for upgrades and equipment replacement necessary to ensure the safe operation of Hanford RCRA-permitted facilities (e.g., 242-A Evaporator, WTP melters systems, and-so-forth).

Addendum 1: Liquid Effluent Retention Facility and 200 Area Effluent Treatment Facilities:

1. Identify in the Permit conditions the criteria for receiving new waste streams at ETF and whether or not the process includes a public participation process.
2. Include a Permit condition to require hazard identification and hazard mitigation in the Permit.
3. Include a Permit condition requiring the waste acceptance criteria to include identification of abnormal feed streams.
4. Take into consideration the uncertainty of characterization and volumes of waste streams primarily coming from WTP and going to ETF, ensure a robust and conservative waste acceptance criterion for ETF, and ensure that these criteria are reflected in the Permit conditions.

**Permit Conditions:**

- Changes to Permit Condition III.3.R.3: YN requests retention of current Permit condition requirement to update the groundwater-monitoring network with following edits: *Maintain and update the groundwater-monitoring network as needed to meet compliance with WAC 173-303-645.*
  - Suggest edits to delete Permit Condition III.3.4.3.a-c if all requirements in the cited report have been met.
  - Suggest new Permit Condition in III.3.D to state requirements for placement (if that is the intent) of report in the Hanford Facility Operating Record for LERF and 200 Area ETF. If the intent is replacement of the Addendum D, Groundwater Monitoring Plan, or significant changes to the

Groundwater Monitoring Plan, this modification should be reclassified as a Class 3 Permit modification.

**Part A Form:**

- Section IV - YN requests street location, etc to be specifically identified. Delete proposed; retained current information or update to reflect U.S. Department of Energy Owner/Operator office location.
- Section IX- YN requests clarification of use of the additional new NAICS Codes. It is thought code information in this section is to be specific to the LERF/ETF facility per Ecology publication 030-31 instructions.
- Section X-YN requests clarification as to the comment/ information proposed provided regarding the AOP. Delete or include as needed.
- Section XIII- YN requests clarification of use of U code. Section XIV-Verify and confirm all estimated annual quantities of wastes
- With additional number of process units (2), YN requests verification and clarification that changes in capacities do not exceed the 25% increase limits due to modifications or additions of tanks or container units [WAC 173-303-830-Appendix I]. Should these changes indicate exceedance of limits, YN requests this proposed modification be reclassified as a Class # 3 modification.
- YN requests clarification and verification as to how the schedule of evaporator campaigns will ensure adequate attention is given to operational and maintenance needs for the LERF/ETF facilities.

**Addendum B:**

- YN requests confirmation that edits in description of the primary treatment train do not indicate changes in ETF operations (e.g., final pH adjustments and verifications).

**Addendum C:**

- YN requests verification and confirmation that with this modification, the secondary containment requirements for each area are sufficient for the volumes of waste to be stored therein for any point in time. Each area must comply with WAC 173-303-630/-640 requirements for secondary containment for containers and/or tanks. YN notes the interconnectedness of all secondary containment systems (e.g., drains to tanks). YN requests denial of this portion of the proposed modification unless each storage/treatment area has its own compliant secondary containment system.
- Given the extension of the operations of the WTP facility, YN requests confirmation and verification of integrity of ETF's tanks and ancillary equipment (and secondary containment systems)
- Given the extension of the operations of the WTP facility, YN requests confirmation and verification of the operational capabilities and integrity of LERF's liners, dikes, etc over the intended life of the facility given the extension of the operations of the WTP facility.
  - Confirm and verify all engineering calculations regarding structural integrity of the floor, flood-volume calculations, etc of each of the newly defined container storage and treatment areas.
- Table C.4: Edit and confirm dimensions of required secondary containment for all equipment included in Addendum C. Verify details of types of secondary containment for each area are identified on drawings (or elsewhere; identify any referenced documents).
- Table C.6: Confirm proposed values are consistent with capacities on the Part A form. Clarify edits to footnote #2-identify what is the operational capacity.
- Clarify with more details, the secondary containment in use at the 2025-ED Load-in station and catch basin. Asphalt alone is not sufficient protection of human health and the environment against spills of any type. Verify appropriate secondary containment and inspection criteria are in place for these areas. To ensure secondary containment requirements are maintained, verify permit conditions are in place to ensure no waste volumes will be received which exceed the volume of available space within the containment basin at any one time.

- Clarify with more details, control measures for run-on in the Outside Container Storage Area. Verify and confirm that containers in stored in this location do not contain free liquids or wastes which exhibit the characteristics of ignitability or reactivity. Confirm there is no need for protective covering.
- Confirm Load-in Station tanks, the surge tank and the *secondary treatment train* are designed to manage the maximum capacity of any liquids via spills or leaks from the process area, the truck bay, container storage, and Load-in Station areas.
- Clarify areas where containers of incompatible wastes are stored.
- Clarify proposed text to include the use of 'small water trucks.' See line 28, pg. Addendum C.4 (~pg. 110 of pdf). Is this a change in operations? What waste streams, if any, are being transported?
- Clarify use of and location of any 90-day storage pads. (See deleted text on page Addendum C.11).
- Clarify with more details, the movement/transport of containers to other TSD facilities or to ERDF.

**Addendum H:**

- Confirm with closure of tank system for tanks 59A-TK-109 and -117; all system components will concurrently be managed as dangerous wastes and disposed of as dangerous wastes.
- Edit line 6 proposed texts to state: *If any tank system components are found not to meet...*
- YN request confirmatory sampling of soils beneath both LERF's liners and ETF's concrete and asphalt (or other coated areas) in addition to visual inspects to verify no releases to the environment. Note: YN disagrees with the leaving of concrete or asphalt surfaces regardless of status of meeting the clean debris surface standards rather than returning the land to original conditions.
- Section H.5.2.1: YN requests denial of proposed changes to Addendum H and modification of proposed paragraphs to reflect details of all closure activities and completion of closure activities within 90 days. None of the points made justify length of proposed schedule extension.

**Addendum I:**

- Table I.1: Edit to modify inspections of the Uninterruptible Power Supply (UPS) to monthly or bimonthly to ensure support of 242-A Evaporator campaigns/WTP.

**SEPA:** Providing the SEPA checklist for public review promotes better understanding of the SEPA process and enhances public knowledge of the unit. As noted in our attached comments, the Yakama Nation believes this proposed permit modification may fall within the definition of a Class 3 Permit Modification. This should include a new SEPA determination available for public review.

**Fact Sheet:**

- Factsheet (likewise the Addendum C) does not explain proposed changes to Permit Condition III.3.R.3 in enough detail. It is unclear as to the intent of change. Is the Permittee merely required to ensure placement of the LERF Engineering Evaluation and Characterization Report in the Hanford Facility Operating Record or does this report replace the Groundwater Monitoring Plan or in some way require updated changes to the Groundwater Monitoring Network. Such changes could result in requirement that this modification be identified as a Class 3 modification. Verify and clarify intent of changes to Condition III.3.R.3 and provide cited report for public review.
- The Factsheet (likewise the Addendum C) does not speak to changes resulting in increasing the quantity and updating the basis for the process design capacity and estimated annual quantity of waste. Nor does it provide details of changes to include additional NAICS Codes. YN requests verification and clarification that changes in capacities do not exceed the 25% increase limits due to modifications or additions of tanks or container units [WAC 173-303-830-Appendix I]. Should these changes indicate exceedance of limits, YN requests this proposed modification be reclassified as a

Class # 3 modification. YN requests clarification of all changes on the Part A Form to be provided with new Factsheet for Class #3 modification should this be required.

- The Factsheet omits an important aspect of the 242-A Evaporator which is that the evaporator is 35 years old and requires continual maintenance. The fact sheet omits the fact that the evaporator has a frequency of equipment failures (pumps fail etc) which have not been carefully tracked and are not carefully planned for in the future. YN requests clarification of frequency of equipment failure and a planned equipment replacement schedule is included within Addendum C and the Permit Conditions to ensure support of 242-A Evaporator campaigns over the lifetime of the facility. YN also requests verification of a schedule for equipment failures for both LERF and ETF.

**The YN ERWM program requests the following changes to the draft LERF / ETF Permit:**

SEPA: DNS base on previously submitted SEPA checklists and prior determinations. New permits require new evaluations of current operations.

General Comments on Permit Conditions:

1. Edit /revise permit conditions to ensure consistency with DST permit conditions.
2. Edit all hyper-links to include entire citation referenced (e.g. WAC 173-303-640(7); only WAC 173-303-640 is hyper-linked and not the necessary (7) portion).
3. Revise Addendum B, Section B.7 Quality Assurance/Quality Control as needed to ensure consistency with Ecology Publication #09-05-007 Guidance for Preparing Waste Sampling and Analysis Documents and QA/QC Requirements at Nuclear Waste Sites.
4. To ensure secondary containment system capacity requirements (WAC 173-303-630(7) are met; Include/revise a permit condition limiting to 50 percent of floor area of the container storage (22.9 by 8.5 by 0.15 meters) to be occupied by containers at any one time. [See pg. 17 Addendum C, line 1, Section C.3.4.3].
5. To ensure compliance with Addendum C, Revise Waste Acceptance Permit conditions to identify the criteria for receiving new waste WTP streams at ETF. Take into consideration the uncertainty of characterization and volumes of waste streams primarily coming from WTP and going to ETF, and ensure a robust and conservative waste acceptance criterion for ETF.
6. Edit and explain in Addendum C Section C.6 the following text: *because the 200 Area ETF main treatment train is a Clean Water Act, equivalent treatment unit [40 CFR 268.37(a)] incorporated by reference by WAC 173-303-140, generators are not required to identify underlying hazardous constituents for characteristic wastes pursuant to 40 CFR 268.9, incorporated by reference by WAC 173-303-140, for wastewaters (i.e., <1 percent total suspended solids and <1 percent total organic carbon) this precludes 10% or greater organics in waste streams to be processed at ETF.* Delete Addendum B, Section B.2.2.2 Pg. 14, lines 6 & 7 statements that it would be impractical to define numerical acceptance or decision limits, etc. [see Section C.6 Air Emissions Control: Subpart BB (WAC 173-303-691) is not applicable because aqueous waste with 10 percent or greater organic concentration would not be acceptable for processing at the ETF.]
7. Include more details in Addendum C (in the appropriate Section(s)) as to what human health or environmental hazards may exist as a result of facilities operations and the controls in place to mitigate or eliminate these concerns
8. Include more details in Addendum C, Pg. 8, line 3, Section C.2.2 Effluent Treatment Facility Operating Configuration to describe potentially abnormal feed streams which could threaten human health or the environment and how these will be documented.
9. Include more details in Addendum C, Pg. 10, line 39, Section Verification on what's done to the effluent returned to the LERF, should a treated effluent not meet Discharge Permit or Final Delisting requirements.
10. Include more details in Addendum C, Pg.11, line 40, Section Concentrate Staging on how the solids are removed to prevent fouling and to protect the thin film dryer, and to maintain concentrate tank capacity.
11. Include more details in Addendum C, Pg. 36, line 45, Section C.5.2.1.5 Internal and External Pressure Gradients on how the filter extracts the organic compounds ensuring the air is non-toxic.
12. Include details in Addendum C, Pg.12, line 14, Section Container Handling on safety precautions during manual recapping of filled containers and complies with WAC 173-303-630(5) requirements.

13. Include details in Addendum C, Pg.15, line 9 on how the 200 Area ETF floor provides secondary containment, and the 200 Area ETF roof and walls protects all containers from exposure to the elements in accordance with the WAC 173-303-630(7),(8),and (9)requirements.
14. Include details in Addendum C, Pg.15, line 14 on how the absorbents are added, as necessary in accordance with the WAC 173-303-160(4)(b)(i) thru (iv) requirements.
15. Include details in Addendum C, Pg.15, line 27 on how any reused or reconditioned container will comply with WAC 173-303-160 requirements.
16. Include citation WAC 173-303-630 as a compliance requirement in Addendum C, Pg 15, line 31, Section C.3.2 Container Management Practices.
17. Include citation WAC 173-303-630(9) as a compliance requirement in Addendum C, Pg 17, line 23, Section C.3.4.6: Prevention of Ignitable, Reactive, and Incompatible Wastes.
18. Include details in Addendum C, Pg.13, Section C.2.5.2 Vessel Off gas System & Pg. 31, Section C.4.6 Air Emissions on how the following is dealt with and how this is in compliance with WAC 173-303-630(11) requirements [note: Section C.6 is very well written]:
  - a. Degasification; on how purged carbon dioxide is vented to the vessel off gas system (including description of air filters).
  - b. Thin Film Drying; on how non-condensable vapors and particulates from the spray condenser are exhausted to the vessel off gas system (including description of air filters).
19. Addendum D: General Comments:
  1. Addendum D monitored dangerous constituents and those monitored in Addendum H are, disconnected. Retain Arsenic, beryllium as constituents of concern in both Addenda.
  2. Edit/revise Addendum D (e.g., D.3.9.6) to remove any reference to use of the Shewhart/CUSUM method and revise with Ecology approved statistical method. (see Appendix A-PNNL-14521-Communications with Ecology; A.1 letter from D. Goswami to M.J.Furman)
  3. Edit Groundwater Permit conditions and Addendum D to ensure compliance with WAC 173-303-645. Addendum D: Pg 5, line 24 Section D.1 states "Inter-well statistical evaluation of LERF groundwater monitoring data has not been performed since 2001." Given that background or baseline values are used to determine whether a RCRA-regulated unit has adversely affected the groundwater quality in the uppermost aquifer beneath the site. And that this is accomplished by testing for statistically significant changes in concentrations of constituents of interest in a downgradient monitoring well relative to baseline levels. And that these baseline levels could be obtained from upgradient (or background) wells, and are referred to as interwell (or between-well) comparisons, it is unclear how required (WAC 173-303-645) statically significant evidence of contamination is obtainable.
  4. Edit Addendum D and include Permit condition(s) to ensure monitoring well maintenance, remediation, and abandonment will involve and be performed in accordance to the following:
    - Development of a well inspection plan involving inspection of wells at least once every 5 years; placement of inspection documentation in the Hanford Facility Operating Record).
    - Evaluation of wells in accordance with Sections 4.2 through 4.8.3 of Attachment 1 of the HF RCRA
    - Provision of written notice to Ecology at least 72 hours before the Permittees remediate (excluding maintenance activities) or abandon any well subject to the HF RCRA Permit.
    - Construction of wells pursuant to the HF RCRA Permit in compliance with WAC 173-160.
  5. Addendum D: Edit LERF Groundwater Permit conditions and Addendum D to require re-drilling of well 299-E35-2 to depths sufficient for groundwater monitoring sampling requirements (i.e., yield representative samples of groundwater) and drill additional new upgradient and down-gradient wells (see SGW-41072, REV 0, 'The main potential weakness of the well configuration for monitoring would be for constituents to sink and transport below

well 299-E26-10 because the well is not fully penetrating & Addendum D, Pg. 11, line 13 Section D.2.4 ). LERF Groundwater monitoring wells: Well 299-E26-11 [east of LERF] formerly identified as the 'upgradient well,' has been determined to be in a semi-confined aquifer and may not provide representative samples in comparison to the other wells in the monitoring system. It and well 299-E26-10 are projected to be unfit for sampling with the decline of the water table. Furthermore, as groundwater flow rates and directions is westerly when incorporating well 299-E26-11 water-level data and more southerly when data for well 299-E26-11 are not incorporated (SGW-41072, REV 0), it has not been demonstrated how the current well monitoring system can be "deemed adequate" and in compliance with WAC 173-303-645(8)(a) without appropriate location of and depth of reliable upgradient and downgradient wells.

6. Edit Addendum D, as need, for clarity to include:
  - Calculation of the rate of unconfined aquifer decline at all groundwater monitoring wells at the LERF point of compliance
  - Establishment of the lateral continuity of the unconfined aquifer between groundwater monitoring wells at the LERF point of compliance
  - Establishment of the hydrogeologic and groundwater chemistry relationships between groundwater in the Hanford Formation and the uppermost portion of the Elephant Mountain Member (i.e., determine if these represent a single, laterally-continuous aquifer)
  - Hydrogeologic testing, well construction, monitoring, etc., as necessary, to achieve the stated objectives of the groundwater-monitoring program.
  - Calculation and recording of a "leakage rate" for each basin quarterly (once per every three months). The "leakage rate" calculation will be based on totalizer readings, leachate pump rate, and sump level change. The "leakage rate" will be calculated and recorded in units of gallons/acre/day.
  - A description of procedures and protocol followed for quarterly (once per every three months) leachate quantity measurements and "leakage rate" calculations. The procedures and protocol followed will be maintained at the LERF Basin's unit. The description will include a description of equipment and methods for reading and/or calculating volumes.
  - Explanation of how records and results of leachate quantity measurements and "leakage rate" calculations will be maintained at the LERF Basin's unit.
7. From the different geochemistry observed at the various LERF wells, it might be concluded that the wells are not interconnected. As such, Ecology should demonstrate how it was determined that the current groundwater-monitoring network is sufficient to detect releases from LERF. Since this cannot be demonstrated and given the presence of nitrate and sulfates, and the lack of a monitoring well in the confined aquifer (in the basalt), vadose zone monitoring is justified (using omnibus authority WAC 173-303-815(2)(b)(ii)).

Edit Addendum D to ensure satisfaction of performance standards of WAC 173-303-283 that prevent degradation of groundwater quality by to include a sampling and analysis(SAP) describing how the Permittee will evaluate, select, construct, and implement unsaturated monitoring beneath the LERF surface impoundments. This should include description of procedures, structures, or equipment used in the Unsaturated Monitoring Plan; the type(s), numbers, and location of instruments deployed; schedule for constructing or installing any new equipment; description of sampling and analysis; reporting schedules; description of procedures to be followed in the event of a detected release. Consideration should be given to the following alternative environmental monitoring technologies:

- Neutron-Neutron: determination of moisture content, porosity (saturated), and identification of aquitards and lithology
  - Tensiometry/Suction Lysimetry: derivation of matrix potential; water content, hydraulic conductivity; pore water samples
  - Resistivity Tomography: monitor changes in bulk density;
  - Crosshole Radar: moisture distribution, lithology, soil disturbances, buried materials
  - Seismic Tomography: porosity, mechanical rock properties, lithology;
  - Crosshole Electromagnetic Induction: moisture distribution, identification of shallow contaminant plumes, lithology through steel casing
  - High-Resolution Resistivity: moisture, lithology, geologic structure, buried materials, identification of shallow contaminant plumes
  - Time Domain Reflectometry: monitoring flow and transport, and lithology
8. Edit Addendum D, as need, to reference to D.3.11 when discussing data evaluations not D.3.13.
  19. Edit Addendum F, to include compliance with WAC 173-303-340 requirements.
  20. Edit Addendum F Pg. 6, line 29, Section F.2.1 to specifically cite [as appropriate given the event] WAC 173-303, -145, -350, -360, -610, -645 as the regulatory requirements for management of spills.
  21. Edit Addendum F, Pg 8, line 37, Section F.3 to delete following text: *Therefore, the requirements of WAC 173-303-806(4)(a) are not applicable.* All RCRA permitted facilities are subject to WAC 173-303-806(4).
  22. Edit Addendum G Training Category Matrix Table, for consistency with Addendum H, to require training in Emergency Response for Sampling Personnel.
  23. Edit Addendum H to include text as needed to provide details [e.g., name of TSD disposal unit] of the management of containers filled with waste as a result of various closure actions for these facilities.
  24. Edit Addendum H to include text as needed to ensure all “disposals” are in a RCRA compliant facility includes meeting LDR requirements of WAC 173-303-140.
  25. Edit Addendum H Pg. 6, line 40-41, Section H.2.3 Closure Standards for Underlying Soils (and elsewhere as needed) to include text that in addition to EPA/240/B-01/003 (EPA/QA R-5), *EPA Requirements for Quality Assurance Project Plans*, as amended, the sampling and analysis plan will be consistent with Ecology Publication #94-111, *Guidance for Clean Closure of Dangerous Waste Units and Facilities* as amended.
  26. Edit Addendum H, Pg. 5, line 17 Section H.1 to delete “aqueous makeup” as included in uncontaminated equipment and structures, etc.
  27. Edit Addendum H, Pg. 6, line 3 to delete “practical.” All ancillary equipment must be flushed and drained. Provide details as to the disposal in a RCRA compliant facility. Edit line 12, to delete reference to partial closure.
  28. Edit Addendum H, Pg. 6, line 22 Section H.2.3 to cite WAC 173-303-140 requirements.
  29. Edit Addendum H, Pg. 6 lines 30-41 Section H.2.3 to include citation WAC 173-303-610(2)(b)(i), or background levels for Hanford soil if background is greater as the closure performance standard for soils/soil/bentonite mixture under ETF. Identify requirement of the Sampling and Analysis Plan to be consistent with Ecology Publication #09-05-007.
  30. Edit Addendum H, Pg. 7 Section H.3.1 General Closure Activities to state closure will comply with WAC 173-303-640 and 173-303-650 requirements as well as 173-303-610.
  31. Revise Addendum H, Pg. 8, lines 45-46-, Section H.3.4.2 [an elsewhere throughout the document as necessary] “Drainage Layer and Secondary Liner” Line 14: Include text to describe management of filled waste containers. Edit Addendum H to include text to describe management of containers filled with waste as a result of various closure actions for these facilities.

32. Revise Addendum H, Pg. 8, lines 45-46-, Section H.3.4.2 [an elsewhere throughout the document as necessary] "Drainage Layer and Secondary Liner" to also state the sampling and analysis plan will also be consistent with Ecology Publication #09-05-007.
33. Revise Addendum H, Pg. 9, lines 16-, Section H.3.4.3 [an elsewhere throughout the document as necessary] "Tanks" to also state tanks closures will comply with WAC 173-303-640(8) requirements. Define that all tanks not meeting clean debris performance standards will be macro-encapsulated in their entirety, by use of a jacket of inert inorganic materials and disposed of in a RCRA compliant storage facility [e.g. ERDF].
34. Revise Addendum H, Pg. 10, lines 13-15, Section H.3.4.4 [an elsewhere throughout the document as necessary] "Internal and External Piping and Ancillary Equipment" to state: *If it is not possible to meet the clean debris surface standard or the piping or ancillary equipment cannot be inspected, those portions of the piping and ancillary equipment will be removed, designated, and disposed of according to WAC 173-303-640(8) and 173-303-650 requirements.* Delete text, lines 16-19: It is inconsistent with WAC 173-303 Dangerous Waste regulations to require compliance with closure consistent with the 200-IS-1 operable unit decisions; these decisions remain outstanding.
35. Revise Addendum H, Pg. 11, lines 2-18 Section H.3.4.7 [an elsewhere throughout the document as necessary] "Structures" to state closure steps *will include but not be limited to the following activities in accordance to WAC 173-303-610(2)(b)(ii) requirements:*
36. Revise Addendum H, Pg. 11, Section H.3.4.7 [an elsewhere throughout the document as necessary] "Underlying Soils" to require soil sampling under LERF's secondary liner in accordance with WAC 173-303-650(6) and 173-303-610(2)(b)(i) requirements.
37. Revise Addendum H, Pg. 11, lines 26-37 Section H.3.4.7 [an elsewhere throughout the document as necessary] "Underlying Soils" to require sampling of the concrete floors and bermed areas in accordance with WAC 173-303-640(8) requirements.
38. Revise Addendum H, Pg. 11, lines 38-40 Section H.3.4.7 [an elsewhere throughout the document as necessary] "Underlying Soils" to require sampling of the soil areas underneath external piping (transfer lines) between the 242-A Evaporator and LERF and 200 Area ETF in accordance with WAC 173-303-640(8) requirements.
39. Revise Addendum H, Pg. 12, line 4, Section H.5.1 [an elsewhere throughout the document as necessary] Closure of Containers to require Closure in accordance with WAC 173-303-610 & 173-303-630 requirements.
40. Revise Addendum H, Pg. 12, line 12, Section H.5.2 [an elsewhere throughout the document as necessary] Closure of Tanks to require Closure in accordance with WAC 173-303-610 & 173-303-640 requirements.
41. Revise Addendum H, Pg. 12, line 18, Section H.5.3 [an elsewhere throughout the document as necessary] Closure of Surface Impoundments to require Closure in accordance with WAC 173-303-610 & 173-303-650(6)(a) and (6)(b) requirements.
42. Edit appropriate Sections of Addendum I, to ensure compliance with WAC 173-303-320, -630(6), -640(6), and 650(4) requirements.
43. Edit Addendum I, Pg. 8, line 5, Section I.1.3 to ensure compliance with WAC 173-303-320(2)(d) requirements with regards to identification of the date and nature of any repairs or remedial actions taken throughout the facilities(LERF & ETF) to be included in the inspection log(s). Edit subsections as needed to also reflect this compliance.
44. Edit Addendum I to include an Attachment with example of the checklist used by the qualified inspector [reference; Pg 8, line 24, Section I.1.4]
45. Clarify operating levels stated in Addendum I, Pg 7, line 2; other descriptions have indicated 29.5 million as limit.

46. Delete following text in Addendum I, Pg. 7, line 22: *The WAC 173-303-650 regulations do not require a discussion of piping for surface impoundments.* WAC 173-303-650(2)(c) indicates the need to address ancillary equipment which includes piping. Note; It is appropriate to require comprehensive coverage and integrity assessments on piping.
47. Edit for clarity, Addendum J to ensure compliance with WAC 173-303-340(3) is maintained and consistency with Addendum F.
48. Revise Addendum J, Pg. 5, Table J.1 to include all cited sections of Permit Attachment 4, Hanford Emergency Management Plan (DOE/RL-94-02) referenced within the Addendum (e.g., Section 5.1 of Permit Attachment 4 is identified on Pg. 11, line 7, Section J.3.4 as a requirement but unlisted in Table J.1). Provide explanations for 'blank footnotes' In Table J.1.
49. Revise Addendum J, Pg. 10, line 31, Section J.3.2.5.1 to provide explanation of waiver of WAC 173-303-350(3)(b) requirements.
50. Edit Addendum J, Pg. 11, line 5, Section J.3.4 to require written recovery plan to be developed as an Attachment to Addendum J (i.e., prior to). Suggest use of WAC 173-303-815 omnibus authority as support to ensure compliance with WAC 173-303-360(2)(f) thru (i) and (k)(ix).
51. Revise Addendum J, Pg. 14, line 17, Section J.6 to include required compliance with WAC 173-303-350(5) in addition to Permit Attachment 4.