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STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

Mail Stop PV-11 • Olympia, Washington 98504-8711 • (206) 459-6000

August 9, 1991



Mr. Steven H. Wisness  
Hanford Project Manager  
U.S. Department of Energy  
P.O. Box 550  
Richland, Washington 99352

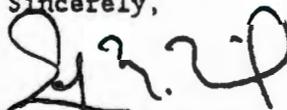
Re: Notice of Deficiency (NOD) for the PUREX Storage Tunnels  
Dangerous Waste Permit Application NOD Response Table

Dear Mr. Wisness:

This letter transmits Ecology's comments on the PUREX Storage Tunnels Dangerous Waste Part B Permit Application NOD Response Table of May 6, 1991. The response table and permit application were reviewed for compliance with final facility status standards in the state Dangerous Waste Regulations (Chapter 173-303 WAC).

I am requesting that USDOE-RL/WHC respond to these comments with a revised and certified Part B Permit Application. This should be submitted no later than October 9, 1991. Should you have questions or concerns regarding this notice, please contact Ms. Megan Lerchen at (206) 438-3089.

Sincerely,

  
for Timothy L. Nord  
Hanford Project Manager

Enclosure

cc: Paul Day - EPA, Richland  
Dan Duncan - EPA, Seattle  
Tim Veneziano - AR  
Dave Nylander - Ecology, Kennewick



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DEPARTMENT OF ECOLOGY NOTICE OF  
DEFICIENCY FOR THE PUREX STORAGE  
TUNNELS DANGEROUS WASTE PERMIT  
APPLICATION DATED MAY 1991  
August 9, 1991

The USDOE-RL/WHC responses for the following numbers are accepted:

1 2 7 8 9 10 11 12 13 15 16  
17 18 19 33 34 35

The USDOE-RL/WHC responses for the following numbers are conditionally accepted pending our review of the revised permit application:

3 4 5 6 20 24 25 26 28 29 31  
36 37 38

The USDOE-RL/WHC responses for the following numbers are not accepted and must be revised in accordance with the requirements stated below:

14 21 22 23 27 30 32

4. Comment: USDOE-RL/WHC states, "Ecology will be notified of future increases or decreases in the number of railcars stored in the tunnels via the TSD facility annual dangerous waste report issued per WAC 173-303-390(2)." This statement is not part of the proposed revised text.

Requirement: This statement must be incorporated in the revised text.

14. Comment: Heavy equipment and cranes would be used in the event that fire causes the tunnel(s) to collapse.

Requirement: Describe the time frame in which this equipment would be employed. Discuss the effect this eventuality would have on the waste retrieval plans for closure.

21. Comment: The proposed revised text discusses meeting the closure performance standards by removal or decontamination of dangerous waste or waste residue to background or regulatory thresholds. If these levels are not attainable, then health-based, MICA derived, standards will be used. This discussion does not include the requirement that non-attainment of the standards stipulated in WAC 173-303-610(2)(b) will necessitate compliance with the post-closure requirements stipulated in WAC 173-303-610(7) through -(11).

The proposed text also states that samples will be obtained from the gravel and soil materials of the tunnel floors but no sampling method is given. The method for obtaining these samples must be included in this plan.

The paragraph on the background determination must be expanded to a meaningful level; it is too vague for unambiguous interpretation.

Requirement: Revise the text to correct the shortcomings outlined in the above comment.

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## PUREX Tunnels NOD

August 2, 1991

22. Comment: The proposed text states, "Closure of Tunnel Number 1 would be performed in accordance with the established closure plan."

Requirement: The closure plan must allow for partial closure of the PUREX Tunnels.

23. Comment: The revised text does not appear to be related to the comment. However, the text raises the following questions:

1) Does the projected volume for Tunnel Number 2 include the volume currently in Tunnel Number 1?

2) Will future storage procedures require removal or treatment for any of the dangerous waste constituents (e.g., mercury)?

Requirement: The section on permit modifications should be revised as proposed. The above questions must also be answered.

27. Comment: Closure cost estimates will be provided as part of the annual report required by WAC 173-303-390. The proposed text does not reference the citation.

Requirement: Revise the text to state, "... in an annual report submitted to Ecology in accordance with WAC 173-303-390."

30. Comment: Revised text is proposed which further describes the procedures referred to in the emergency plan. This text remains inadequate.

Requirement: The emergency plan references a number of documents for procedures that are to be used in implementing the emergency plan. The referenced procedures must also be presented in tabular form detailing, at a minimum, the following:

- Emergency type,
- Procedure document number,
- Procedure document title,
- Applicable page, section, or chapter reference, and
- Procedure manual location.

32. Comment: Document number WHC-IP-0603 is described as applicable only to non-hazardous units.

Requirement: This should be made clear on the form or within the descriptive text.

36. Comment: The comment discusses the use of MSDS's as they apply to spill reporting. Although the text revision (removal of the MSDS from the application) will remove this problem from the permit application, USDOE-RL/WHC should note that sole reliance on a manufacturer's MSDS to determine Ecology notification is not advisable.

# CORRESPONDENCE DISTRIBUTION COVERSHEET

Author	Addressee	Correspondence No.
T. L. Nord, Ecology	S. H. Wisness, RL	Incoming: 9103737B

**Subject:** Notice of Deficiency (NOD) for the PUREX Storage Tunnels  
 Dangerous Waste Permit Application NOD Response Table

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