

START

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Page 1 of 4

DON'T SAY IT--WRITE IT!!

Date: December 9, 1993
To: Joe Witczak
From: Cliff Clark
Subject: COMMENTS ON DRAFT HANFORD FACILITY RCRA PERMIT RECEIVED 11/30/93

Thanks for the opportunity to review the subject draft. Based on a limited review of the draft by RL, WHC, and PNL representatives, comments considered to be of a more significant nature are provided below. During our review we also identified other suggested changes that we would like you to consider, if your permit issuance schedule allows. We would be able to forward these changes to you by the middle of next week. We would also like to comment on the QA/QC section (II.E.) when this section becomes available. Give me a call if you have any questions.

1. Condition: Introduction, Part V
Text Location: Page 6, lines 15 - 25
Comment/Action: This discussion does not adequately indicate that TSD units undergoing closure will not be required to meet those Standard and General Conditions that apply only to operating TSD units. Insert language in the Part V description clarifying this point.
- Justification: The recommended text revisions will help avoid ambiguity in compliance and enforcement.
2. Condition: I.A.1.a.
Text Location: Page 14, lines 16 - 23
Comment/Action: Delete the word "currently" from the first sentence of the second paragraph (line 17). This paragraph does not adequately indicate that TSD units undergoing closure will not be required to meet Standard and General Conditions that apply only to operating TSD units. Insert language in this paragraph clarifying this point.
- Justification: Same as Justification for Comment No. 1.
3. Condition: I.E.15.c.
Text Location: Page 22, lines 16 - 17
Comment/Action: Remove the words "or radioactive" from this sentence.
- Justification: This change will ensure consistency with the deletions of "radioactive" already made in this condition.



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4. Condition: II.D.1.
Text Location: Page 27, lines 44 - 46
Comment/Action: Delete the last sentence of this condition.

Justification: The permit should only address those WAPs associated with a specific TSD unit. This sentence implies that there will be other WAPs, which is not the case.
 5. Condition: II.D.2.
Text Location: Page 27, line 49
Comment/Action: Change "Parts" to "Part" and deleted "or V".

Justification: WAPs are not required for closure plans.
 6. Condition: II.D.4.
Text Location: Page 28, lines 42 - 44
Comment/Action: Delete this condition.

Justification: Same as Justification for Comment No. 3.
 7. Condition: II.F.2. and II.F.3.
Text Location: Page 34
Comment/Action: Remove references to vadose zone throughout these conditions.

Justification: WAC 173-303 groundwater monitoring requirements do not apply to vadose zone monitoring.
 8. Condition: II.F.2.a.
Text Location: Page 34, line 8
Comment/Action: After "of", delete the remainder of the sentence and add "Attachments 6 and 7 (*Policy on Remediation of Existing Wells and Acceptance Criteria for RCRA and CERCLA, June 1990*)."
 9. Conditions: II.F.2.b. and II.F.2.d.
Text Location: Page 34
Comment/Action: Delete these conditions.

Justification: These conditions are already covered by Attachments 6 and 7. These conditions also are inconsistent with Ecology action taken elsewhere in Washington State.
 10. Condition: II.M.
Text Location: Page 42, lines 3 - 5
Comment/Action: The previous draft of this condition contained a line clarifying that "no artificial barrier around the facility is required." Reinsert this line.

Justification: This line would clarify that the 24-hour security surveillance activities conducted at the Hanford Facility are sufficient to ensure that no artificial barrier around the facility is necessary.

11. Condition: II.0.1.
Text Location: Page 43
Comment/Action: Add a Condition II.0.1.e. stating that daily inspections of aboveground tank systems that are located in areas of high radioactivity will not be required and that the inspection frequency will be specified in Part III.

Justification: In M-22 Milestone discussions held in 1989, Ecology committed to address this need in the permit. The addition of Condition II.)1.e. will enable ALARA considerations to be accommodated.

12. Condition: II.U. and II.V.
Text Location: Pages 45 through 47
Comment/Action: Preliminary estimates indicate that the costs for implementation of these conditions will be significant. These conditions will be likely candidates for consideration under the cost/efficiency initiative.

Justification: Advanced information on areas of the permit that have a high potential to be recommended for a cost/efficiency evaluation.

13. Condition: III.1.B.f.
Text Location: Page 51 - 53
Comment/Action: Add language which establishes the link between this condition and Condition III.1.B.n.

Justification: It is not apparent that this condition establishes the methodology for confirmation of designation. A cross-reference to Condition III.1.B.n. would help reduce ambiguity in compliance and enforcement.

14. Condition: III.1.B.r
Text Location: Page 54, lines 48 - 50
Comment/Action: Delete line after colon and replace with the following: "Waste may be accepted at the 616 NRDWSF that is generated under a different EPA ID number."

Justification: RL is currently planning to pursue separate EPA/Ecology identification numbers for those areas of their operations which are not contiguous with the Hanford Facility. The option to send waste to the 616 NRDWSF from these locations needs to remain open.

15. Condition: III.2.B.d
Text Location: Page 59 - 61
Comment/Action: Add language which establishes the link between this condition and Condition III.2.B.f.

Justification: Same as Justification for Comment No. 13.

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16. Condition: V.1.B.m.
Text Location: Page 69, lines 10 - 11
Comment/Action: Delete "however, the date of final closure shall not exceed six months after the effective date of this Permit."

Justification: Closure will not be completed within 180 days after the effective date of this Permit. This condition is inconsistent with agreements regarding the timing of closure made in 183-H unit manager meetings.

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