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Department of Energy  
Richland Operations Office  
P.O. Box 550  
Richland, Washington 99352

OCT 9 3 1995

96-PCA-002

Mr. Joseph J. Witczak  
Unit Supervisor  
Regulatory and Technical  
Support Unit  
Nuclear Waste Program  
State of Washington  
Department of Ecology  
P.O. Box 47600  
Olympia, Washington 98504-7600

Mr. Moses N. Jaraysi  
Section Supervisor  
200 Area Section  
Nuclear Waste Program  
State of Washington  
Department of Ecology  
1315 West Fourth Avenue  
Kennewick, Washington 99336



Dear Messrs. Witczak and Jaraysi:

QUARTERLY NOTIFICATION OF CLASS 1 MODIFICATIONS TO THE HANFORD FACILITY  
RESOURCE CONSERVATION AND RECOVERY ACT PERMIT, DANGEROUS WASTE PORTION  
(QUARTER ENDING SEPTEMBER 30, 1995)

Condition I.C.3. of the Hanford Facility Resource Conservation and Recovery Act Permit (RCRA Permit), Dangerous Waste Portion (DW Portion), addresses Class 1 modifications as defined in Washington Administrative Code (WAC) 173-303-830(4)(a)(i)(A). This condition allows for quarterly notification of Class 1 modifications to be made to the State of Washington Department of Ecology (Ecology). These modifications are under implementation. A listing of these modifications is maintained in the Hanford Facility Operating Record. The Class 1 modifications are discussed as follows.

The Hanford Facility RCRA Permit (DW Portion) is being modified to update Part III information this quarter (Enclosure). Part III Class 1 modifications pertain to the 616 Nonradioactive Dangerous Waste Storage Facility and 305-B Storage Facility. The Part V Class 1 modifications pertain to the Hanford Patrol Academy Demolition Sites. The Class 1 modifications are being made to ensure that all activities conducted are in compliance with the Hanford Facility RCRA Permit, DW Portion.

Should Ecology determine that the enclosed modifications do not qualify as Class 1 modifications as defined in WAC 173-303-830, written authorization to continue operations is requested until the appropriate level of modification can be accomplished.

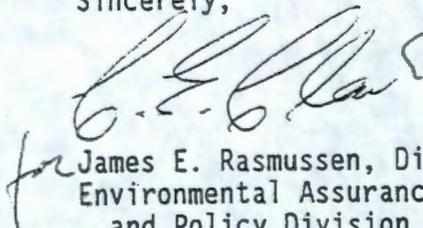
Messrs. Witczak and Jaraysi  
96-PCA-002

-2-

In accordance with a teleconference held with Mr. Moses Jaraysi of Ecology on March 3, 1995, a transmittal letter signed by the permittees is sufficient to authorize the submittal of the Quarterly Notification of Class 1 Modifications to the Hanford Facility RCRA Permit, DW Portion, and to meet the intent of Permit Condition I.F., Signatory Requirement.

Should you have any questions regarding this information, please contact Mr. C. E. Clark, U.S. Department of Energy, Richland Operations Office, at (509) 376-9333; Mr. R. C. Brunke, Westinghouse Hanford Company, at (509) 376-2663; or Mr. H. T. Tilden II, Pacific Northwest Laboratory, at (509) 376-0499.

Sincerely,

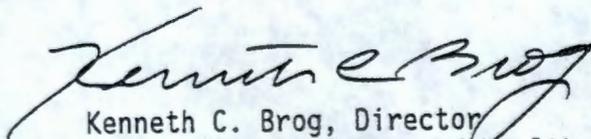


for James E. Rasmussen, Director  
Environmental Assurance, Permits,  
and Policy Division  
DOE Richland Operations Office

EAP:EMM



William T. Dixon, Director  
Environmental Services  
Westinghouse Hanford Company



Kenneth C. Brog, Director  
Environment, Safety, and Health  
Pacific Northwest Laboratory

Enclosure:

Class 1 Modifications to  
the Hanford Facility  
RCRA Permit (DW Portion)  
(Quarter Ending September 30,  
1995)

cc w/encl:

EDMC, H6-08

J. Badden, BHI

D. Duncan, EPA

R. Jim, YIN

D. Powaukee, NPT

H. Tilden, PNL

J. Wilkinson, CTUIR

cc w/o encl:

W. Dixon, WHC

G. Fess, PNL

S. Price, WHC

D. Lundstrom, Ecology

J. Stohr, Ecology

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**QUARTERLY NOTIFICATION OF CLASS 1 MODIFICATIONS TO  
THE HANFORD FACILITY RCRA PERMIT,  
DANGEROUS WASTE PORTION  
(Quarter Ending September 30, 1995)**

Page 1 of 17

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9513383 2899

**PART III CLASS 1 MODIFICATIONS:  
616 NONRADIOACTIVE DANGEROUS WASTE STORAGE FACILITY  
UNIT-SPECIFIC CONDITIONS**

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1. Page T12-1.2, line 17, Change 616 NRDWSF to Hanford Facility.

Reason: Reports and records older than five years, will be scanned into an electronic system located on the Hanford Facility.

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**PART III CLASS 1 MODIFICATIONS:  
616 NONRADIOACTIVE DANGEROUS WASTE STORAGE FACILITY  
UNIT-SPECIFIC CONDITIONS (cont.)**

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Page change.  
DOE/RL-89-03, Rev. 2  
Page T12-1.2

Table 12-1. Reports and Records. (sheet 2 of 3)

Item	Storage	
	Retention time	Location
<b>TREATMENT, STORAGE, AND/OR DISPOSAL REPORTS AND RECORDS:</b>		
<u>Permit Application Plans:</u>		
Waste analysis plan	Life of 616 NRDWSF	616 NRDWSF
Contingency plan and amendments	Life of 616 NRDWSF	616 NRDWSF
Training plan	Life of 616 NRDWSF	616 NRDWSF
Closure plan	Life of 616 NRDWSF	616 NRDWSF
Postclosure plan	Not required	NA
Inspection plans	Life of 616 NRDWSF	616 NRDWSF
<u>Operating Reports and Records:</u>		
Waste description and quantity	Life of 616 NRDWSF	616 NRDWSF
Waste location	Until closure	616 NRDWSF
Waste analysis data	Life of 616 NRDWSF	Hanford Facility
Inspection records	Varies from 5 years from inspection date to life of 616 NRDWSF	Hanford Facility
Certification of waste minimization efforts	Life of 616 NRDWSF	616 NRDWSF
<u>Land Disposal Restriction Records:</u>		
Extension to an effective date	Life of 616 NRDWSF	Hanford Facility
Petition for a variance	Life of 616 NRDWSF	Hanford Facility
Notice and certification of treatment standards	Life of 616 NRDWSF	Hanford Facility
Demonstration and certification for a temporary extension to the effective date	Life of 616 NRDWSF	Hanford Facility

9513383 2902  
**PART III CLASS 1 MODIFICATIONS:**  
**305-B STORAGE FACILITY UNIT-SPECIFIC CONDITIONS**

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1. Page 4i, on line beginning with "4.1.1.6.2", change "ORM" to "Class 9".  
  
Reason: Effective October 1, 1992 DOT regulations (49CFR parts 100-177) refer to what was previously ORM-Es, as Class 9's. (ORM classes A, B, and C were redefined into other hazard classes.)
  
2. Page 4i, on line beginning with "4.1.1.6.7", change "Acid" to "Oxidizer".  
  
Reason: Because of PNL's large volume of alkaline wastes, it is necessary to rearrange the drum storage areas. (The overall storage capacity of the facility will not be increased.) The alkaline waste drums will be moved to the area currently occupied by the oxidizer waste drums. The oxidizer waste drums can not be moved to the current alkaline drum storage area because this area is in close proximity to flammable waste drums. Therefore, the oxidizer drum storage will be moved to the area currently occupied by the acid drum storage. The acid drum storage will be moved to the former alkaline drum storage area. Refer to the new figure 4-7 on page 4-15.
  
3. Page 4i, on line beginning with "4.1.1.6.8.", change "Caustic" to "Acid".  
  
Reason: Refer to number 2.
  
4. Page 4ii, on line beginning with "4-2", change "ORM" to "Class 9".  
  
Reason: Refer to number 1.
  
5. Page 4-3, line 8; Beginning with "bulking module located in the southwest corner.....", after "bulking module" add "(Also referred to as cell 5.)"  
  
Reason: The bulking module also is referred to as cell 5 for waste segregation purposes.
  
6. Page 4-5, line 18; Beginning with "Five cabinets, open shelving...", change "Five cabinets" to "Six cabinets".  
  
Reason: To provide a higher degree of safety, all oxidizer and corrosive containers are being placed in enclosed cabinets. Previously, containers were stored on shelving within the cell. The overall storage capacity of the cell will not change.
  
7. Page 4-5, line 28; Change both "ORM"s to "class 9".  
  
Reason: Refer to number 1.
  
8. Page 4-5, line 31; Beginning with "one storage cabinet..", change "one" to "three".

**PART III CLASS 1 MODIFICATIONS:**  
**305-B STORAGE FACILITY UNIT-SPECIFIC CONDITIONS (cont.)**

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**Reason:** Additional cabinets will be added to allow waste container segregation based on DOT packaging criteria. Poisons will be divided into two cabinets. One for DOT packing group I's and one for DOT packing groups II and IIIs. DOT regulations do not allow packing group I's to be labpacked (refer to 49CFR 173.12). This allows for a more streamlined and efficient labpacking process. In addition, reactive Class 9 waste will be placed in an enclosed cabinet, instead of a shelf, to provide a higher degree of safety. The overall storage capacity of the cell will not change.

9. Page 4-5, lines 37-38; Change the "ORMs" on each line to "class 9s".

**Reason:** Refer to number 1.

10. Page 4-5, line 43; Change "ORM" To "class 9".

**Reason:** Refer to number 1.

11. Page 4-5, line 45-46; Beginning with "Two storage cabinets...". Change "Two storage cabinets and two sets of open shelving" to "Four storage cabinets, 3 sets of open shelving, and one explosion proof refrigerator".

**Reason:** Because of the increased waste volumes, more cabinet storage space for alkaline and DOT class 9 (nonreactive) waste containers is being provided. Organic peroxides and other temperature sensitive waste will be stored a the refrigerator to provide an additional degree of safety. The overall storage capacity of the cell will not change.

12. Page 4-6, figure 4-1; Replace with revised "Figure 4-1. Acids and Oxidizers Cell." (refer to attachment 1)

**Reason:** Refer to number 6.

13. Page 4-7, figure 4-2; Replace with revised "Figure 4-2. Poisons and Class 9's Cell." (refer to attachment 2)

**Reason:** Refer to number 8.

14. Page 4-8, figure 4-3; Replace with revised "Figure 4-3. Caustics, State-Only waste, and Nonregulated Waste Cell." (refer to attachment 3)

**Reason:** Refer to number 11.

15. Page 4-9, line 10; Beginning with "Seven factory...". Change "Seven" to "Three".

**Reason:** The language was stated incorrectly in the original Part B permit application. The seven cabinets stored more than flammable liquids (i.e., flammable solids and aerosols). This change reflects the actual number of cabinets containing only flammable liquids.

**PART III CLASS 1 MODIFICATIONS:**  
**305-B STORAGE FACILITY UNIT-SPECIFIC CONDITIONS (cont.)**

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16. Page 4-9, line 13; Add the following to the end of the paragraph: "The following cabinets also are used for storage in this cell: one for combustibles, one for aerosols, two for flammable solids, and one for overflow from one of the other cabinets."
- Reason: Refer to number 14. Also, one cabinet was added to accommodate any overflow from one of the other cabinets within the cell. The overall storage capacity of the cell will not change.
17. Page 4-9, line 16; after "organics cell" add "cell 5,"
- Reason: The flammable gases and liquefied flammable gases are now stored in cell 5 (flammable liquids bulking module). The Uniform Fire Code requirements (UFC), requires highly toxic gases to be stored in a continuously ventilated enclosure.
18. Page 4-9, line 37, after "epoxy paint.", add the following: "Flammable gases in cylinders, liquefied flammable gases, and oxidizing gases will be stored in the bulking module (cell 5)."
- Reason: The UFC requires these waste types to be stored in a continuously ventilated enclosure.
19. Page 4-11, figure 4-4; Replace with revised "Figure 4-4. Organics Cell." (refer to attachment 4)
- Reason: Refer to number 15.
20. Page 4-12, figure 4-5; Replace with revised "Figure 4-5. Flammable Liquids Bulking Module." (refer to attachment 5)
- Reason: This figure more accurately represents the cell configuration. (The cabinet on the south end has been moved further east)
21. Page 4-13, figure 4-6; Replace with revised "Figure 4-6. Segregated High Bay Drum Storage Areas." (refer to attachment 6)
- Reason: Refer to number 2.
22. Page 4-14, line 1; Beginning with "4.1.1.6.7 Acid Waste Storage Area", change "Acid" to "Oxidizer".
- Reason: Refer to number 2.
23. Page 4-14, line 12; Beginning with "4.1.1.6.8 Caustic Waste Drum Storage Area", change "Caustic" to "Acid".
- Reason: Refer to number 2.

**PART III CLASS 1 MODIFICATIONS:  
305-B STORAGE FACILITY UNIT-SPECIFIC CONDITIONS (cont.)**

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24. Page 4-14, line 17; After the sentence ending with "event of an incident.", add the following to the text: "Bulked drums containing acids, with oxidizers as a secondary hazard, will be placed in the cell 1 drum area to prevent any possibility of a reaction with surrounding hazards in the high bay drum storage area.
- Reason: To provide segregation of corrosive waste (with oxidizer as a secondary hazard) from flammable waste.
25. Page 4-14, line 38; Beginning with "Generally, only ignitable waste (oxidizers)...", change "ignitable waste (oxidizers)" to "corrosives, oxidizers,...".
- Reason: The description for corrosive drum storage was inadvertently left out of the Part B Permit application. The "ignitable waste" language is being deleted to eliminate any confusion and specify the oxidizer definition portion of the ignitable characteristic in WAC 173-303-090.
26. Page 4-14 line 40; Change "ORMs" to "class 9s".
- Reason: Refer to number 1.
27. Page 4-15 and 4-16, Replace figure 4-7 with revised "4-7. High Bay Storage Area". (Refer to attachment 7).
- Reason: This was revised to update the location changes of drum storage in the highbay area. (Refer to number 2).
28. Page 4-26, Table 4-3, line 3; Beginning with "Dimensions", add "Exterior" before the word "Dimensions".
- Reason: The exterior dimensions give a more accurate description of the size of the cabinets. The capacity limit gives an accurate description of the interior.
29. Page 4-26, Table 4-3, line 6; Change "39w x 16d x 16h" to "43w x 18d x 65h".
- Reason: The numerical values are being modified to reflect the exterior dimensions of the cabinets. Refer to number 28.
30. Page 4-26, Table 4-3, line 8; insert the following:
- |                   |   |                 |        |
|-------------------|---|-----------------|--------|
| Medium<br>Cabinet | Storage of containers<br>(18.93 liter [5 gal.]<br>or less capacity) | 31w x 31d X 65h | 60 max |
|-------------------|---|-----------------|--------|
- Reason: These are the actual dimensions of the corrosive cabinets used in acids and oxidizers cell.
31. Page 4-26, line 9; change "31w x 33d x 61h" to "34w x 34d x 65h".
- Reason: The numerical values are being modified to reflect the exterior dimensions of the cabinets. Refer to number 28.

**PART III CLASS 1 MODIFICATIONS:  
305-B STORAGE FACILITY UNIT-SPECIFIC CONDITIONS (cont.)**

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32. Page 4-26, line 12; change "32w x 32d x 61h" to "34w x 34d x 65h".

Reason: The numerical values are being modified to reflect the exterior dimensions of the cabinets. Refer to number 28.

33. Page 4-26, line 15; change "56w x 32d x 61h" to "59w x 34d x 65h".

Reason: The numerical values are being modified to reflect the exterior dimensions of the cabinets. Refer to number 28.

34. Page 4-26, line 24; Insert the following as a storage device:

"Flammable Storage Module"	Storage of Containers (18.93 liter [5 gal.] to 208.18 liter [55 gal] capacity)	78w x 73d x 100h	240 max
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Reason: The flammable storage module was addressed and added in the January 1995 Class 1 Modifications, but was not entered on this Table.

35. Page 4-26, line 26; Insert the following as a storage device:

"Refrigerator/ Freezer"	Storage of containers of organic peroxides and other temperature sensitive waste.	34w x 29d x 67h	25 cu.ft.
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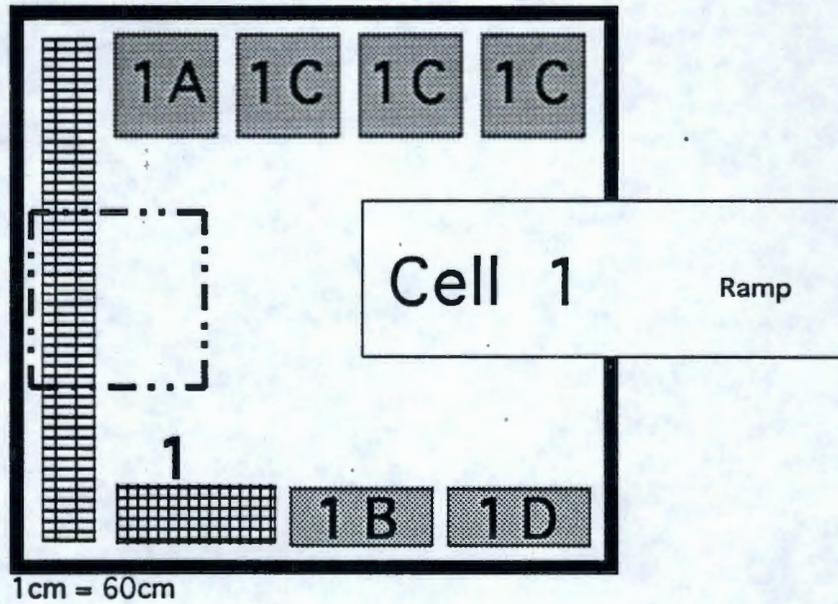
Reason: The refrigerator is used to store organic peroxides and other temperature sensitive waste.

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**PART III CLASS 1 MODIFICATIONS:**  
**305-B STORAGE FACILITY UNIT-SPECIFIC CONDITIONS (cont.)**

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Page Change.  
DOE/RL-90-01, Rev. 1  
Page 4-6



- 1A Liquid Oxidizers (Medium Cabinet)
- 1B Solid Oxidizers (Small Cabinet)
- 1C Inorganic Acids (Medium Cabinet)
- 1D Organic Acids (corrosive) (Small Cabinet)
- 1E Mercury / Corrosive Solids (Small Shelf)

█ 15.24cm W x 127cm H epoxy coated concrete block wall

▤ Secondary Containment Trench

⋮ Drum and Carboy Storage Area

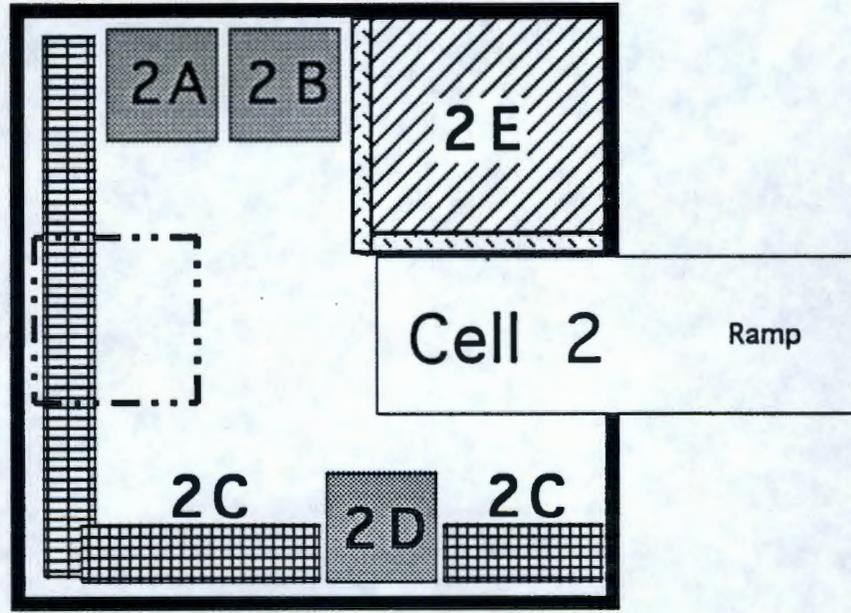
Figure 4-1. Acids and Oxidizers Cell.

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**PART III CLASS 1 MODIFICATIONS:  
305-B STORAGE FACILITY UNIT-SPECIFIC CONDITIONS (cont.)**

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Page Change.  
DOE/RL-90-01, Rev. 1  
Page 4-7



1 cm = 60cm

- 2A Poisons (P.G. II and III) (Large Cabinet)
- 2B Poisons (P.G. I) (Large Cabinet)
- 2C Class 9 (nonreactive) (Large and Small Shelf)
- 2D Class 9 (reactives) (Large Cabinet)
- 2E PCB's

 15.24cm W x 127cm H epoxy coated concrete block wall

 Secondary Containment Trench

 313.69cm L x 8.89cm W x 15.24cm H epoxy coated angle iron, sealed to the floor

 Drum and Carboy Storage Area

Figure 4-2.

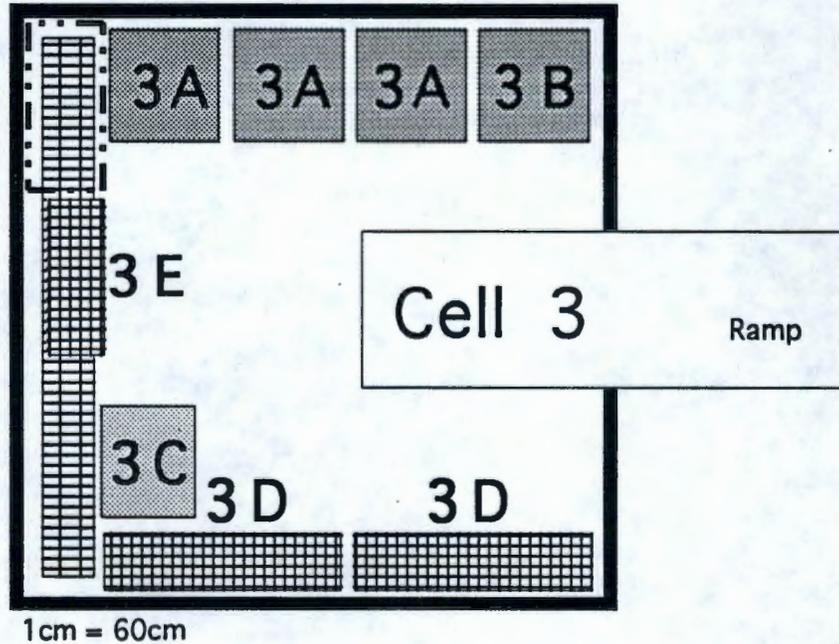
Poisons and Class 9 Cell.

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**PART III CLASS 1 MODIFICATIONS:  
305-B STORAGE FACILITY UNIT-SPECIFIC CONDITIONS (cont.)**

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Page Change.  
DOE/RL-90-01, Rev. 1  
Page 4-8



- 3A Alkaline Solids/ Liquids (Large Cabinet)
- 3B Liquid Alkaline Oxidizers (Large Cabinet)
- 3C Organic Peroxides, Explosives, Temperature Sensitive (Refrigerator/Freezer)
- 3D Washington-Only Liquids / Solids (Large Shelf)
- 3E Non-Regulated Liquids / Solids (Small Shelf)

█ 15.24cm W x 127cm H epoxy coated concrete block wall

▤ Secondary Containment Trench

⊞ Drum and Carboy Storage Area

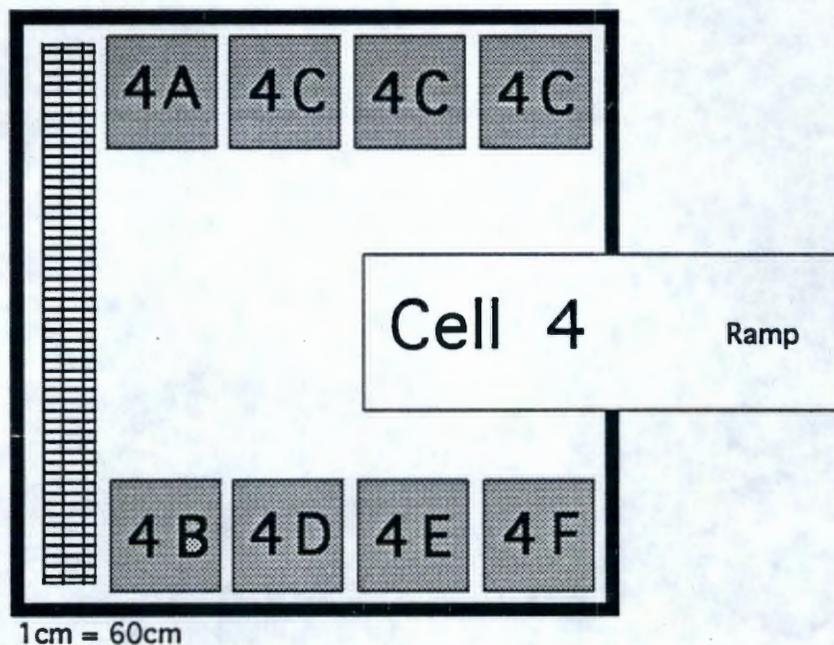
Figure 4-3. Alkaline, Washington-Only and Non-Regulated Waste Cell.

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**PART III CLASS 1 MODIFICATIONS:**  
**305-B STORAGE FACILITY UNIT-SPECIFIC CONDITIONS (cont.)**

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Page Change.  
DOE/RL-90-01, Rev. 1  
Page 4-11



- 4A Combustible Liquids (Large Cabinet)
- 4B Aerosols (Large Cabinet)
- 4C Flammable Liquids (Large Cabinet)
- 4D Flammable Solids (Dangerous When Wet) (Large Cabinet)
- 4E Flammable Solids (w/ water,  
Spontaneously Combustible) (Large Cabinet)
- 4F Floating Cabinet (Large Cabinet)

-  15.24cm W x 127 H epoxy coated concrete block wall
-  Secondary Containment Trench

Figure 4-4.

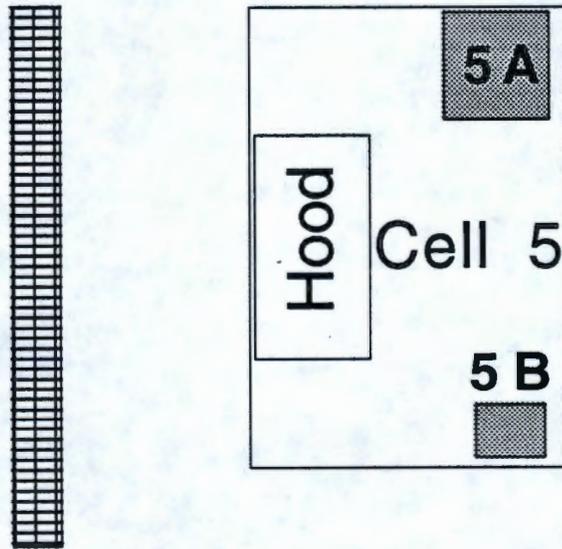
Organics Cell.

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**PART III CLASS 1 MODIFICATIONS:  
305-B STORAGE FACILITY UNIT-SPECIFIC CONDITIONS (cont.)**

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Page Change.  
DOE/RL-90-01, Rev. 1  
Page 4-12



1cm = 60cm

5A Compressed Gases

5B Oxidizing Gases

Hood - Walk-in flammable liquid bulking, 1 drum maximum.



Secondary Containment  
Trench

Figure 4-5. Flammable Liquid Bulking Module and Compressed Gases (Cell 5).

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**PART III CLASS 1 MODIFICATIONS:  
305-B STORAGE FACILITY UNIT-SPECIFIC CONDITIONS (cont.)**

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Page Change.  
DOE/RL-90-01, Rev. 1  
Page 4-13

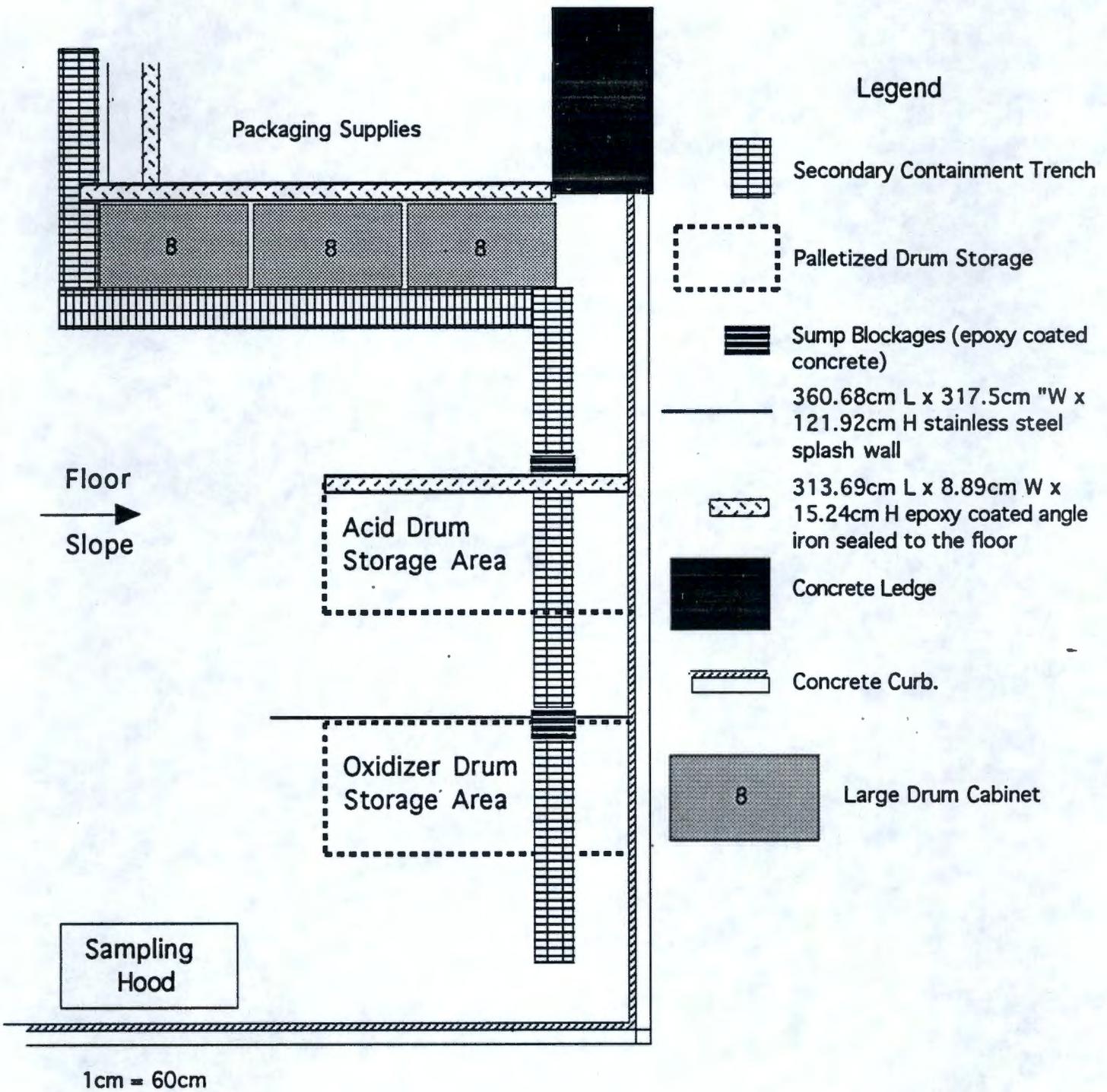


Figure 4-6.

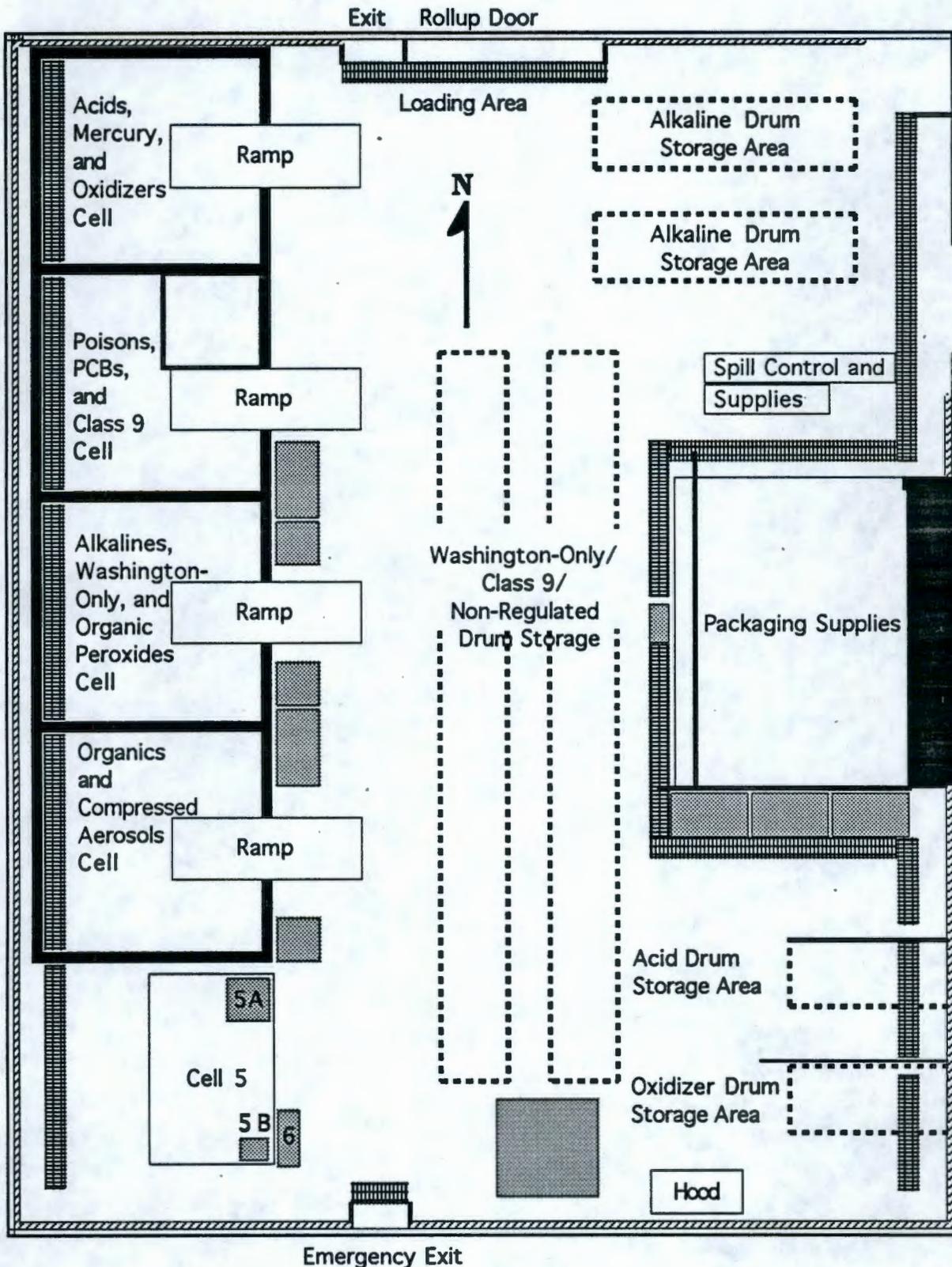
Segregated High Bay Drum Storage Areas.

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**PART III CLASS 1 MODIFICATIONS:  
305-B STORAGE FACILITY UNIT-SPECIFIC CONDITIONS (cont.)**

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Page Change.  
DOE/RL-90-01, Rev. 1  
Pages 4-15 and 4-16



Legend: On next Page

Scale: 1cm = 120cm

Figure 4-7. High Bay Storage Area. (Sheet 1 of 2)

Legend: High Bay Storage Area Diagram

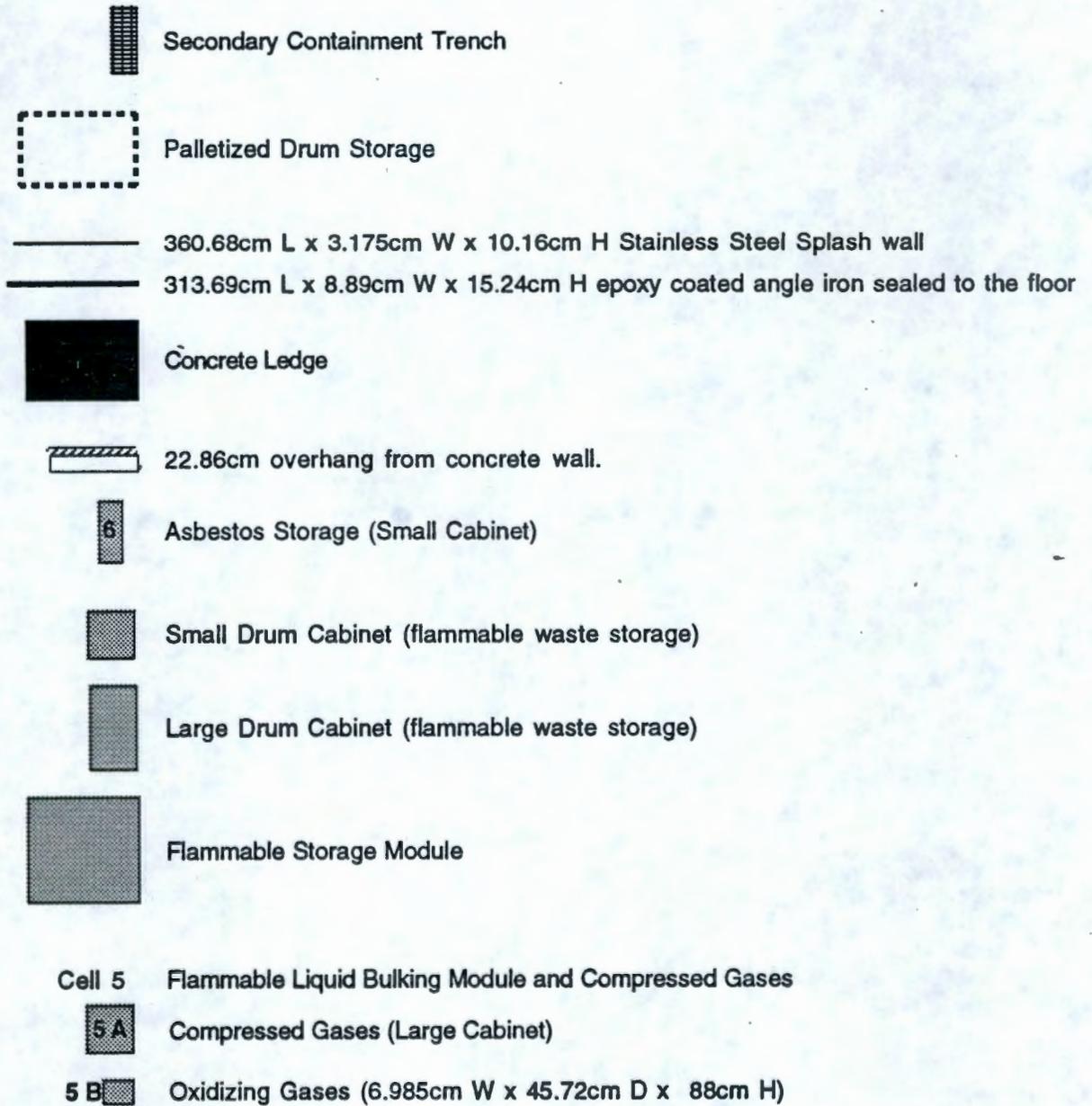


Figure 4-7.

High Bay Storage Area. (Sheet 2 of 2)

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**PART V CLASS 1 MODIFICATIONS:  
HANFORD PATROL ACADEMY DEMOLITION SITES UNIT-SPECIFIC CONDITIONS**

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1. Page 6-4, line 20, change "are" to "were".

**Reason:** The change in tense is being made in order to be consistent with the actual activities associated with the professional engineers review and with the tense used in the 218 E-8 Borrow Pit Demolition Site Closure Plan and the 200 West Ash Pit Demolition Site Closure Plan.

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**PART V CLASS 1 MODIFICATIONS:**  
**HANFORD PATROL ACADEMY DEMOLITION SITES UNIT-SPECIFIC CONDITIONS (cont.)**

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Page change.  
DOE/RL-92-39, Rev.1  
Page 6-4

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• If contamination at the HPADS is above the action levels in the near-surface soils, one of the following actions will be taken.

- If the contamination is from HPADS activities only, soil will be treated and/or disposed of in a RCRA-permitted landfill.
- If the soil is contaminated with dangerous waste constituents from other sources in addition to HPADS activities, the site will be evaluated as a new SWMU. The site would then be turned over for RPP remediation.
- If the soil is contaminated only from sources other than HPADS activities, the site will be evaluated as a new SWMU and remediation will occur under RPP remedial action of the SWMU.

All equipment used in performing closure activities will be decontaminated or disposed of at a RCRA-permitted facility.

Closure activities will be monitored by an independent registered professional engineer who will certify that closure activities were accomplished in accordance with the specifications of the approved closure plan. The certification will be sent by registered mail or an equivalent delivery service.