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HANFORD FACILITY RCRA PERMIT HANDBOOK

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Hanford Facility RCRA Permit Handbook

Date Published
March 1996

**United States
Department of Energy**

P.O. Box 550
Richland, Washington 99352

Approved for Public Release

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SUBJECT: ISSUANCE OF THE HF RCRA PERMIT HANDBOOK BY THE PSC

Attached is the Hanford Facility (HF) RCRA Permit Handbook, Revision 0., that includes comments received from the previous regulator/permittee's review. This document also incorporates Revisions 1 and 2 of the HF RCRA Permit and other agreements (e.g. Marking and Mapping V.E. Study).

Following a concurrence review by the HF RCRA Permit Implementation Steering Committee (PSC) membership, this document can be available for release by the PSC for permittee and regulator use. The document is being transmitted to you for action at the March 19, 1996, PSC meeting. This document will continue to be updated by PSC action to provide HF RCRA Permit implementation guidance for the permittees and regulator.

Cliff.

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INTRODUCTION

PURPOSE

The purpose of this Hanford Facility (HF) RCRA Permit Handbook (Handbook) is to provide, in one document, information to be used for clarification of permit conditions and guidance for implementing the HF RCRA Permit.

Information has been gleaned from several sources including the HF RCRA Permit, Responsiveness Summaries, workshops, and RCRA Permit Implementation Steering Committee (PSC) meetings. The information contained in this Handbook is provided by action of the PSC.

BACKGROUND

The Hanford Facility, located in southeastern Washington State, is owned by the U.S. Government and operated by the U.S. Department of Energy, Richland Operations Office (DOE-RL). Dangerous waste and mixed waste (containing both dangerous and radioactive components) are produced and managed on the Hanford Facility. Waste components are regulated in accordance with RCRA, the *Hazardous and Solid Waste Amendments of 1984*, and/or the *State of Washington Hazardous Waste Management Act of 1976* [as administered through the Washington State Department of Ecology (Ecology) *Dangerous Waste Regulations*, Washington Administrative Code 173-303]; or the *Atomic Energy Act of 1954*.

The original *Hanford Federal Facility Agreement and Consent Order* (Tri-Party Agreement) established a stepwise permitting process that provided for the issuance of an initial HF RCRA Permit for less than the entire Hanford Facility. Any treatment, storage, and/or disposal (TSD) units not included in the initial HF RCRA Permit were to be incorporated through a permit modification. The TSD units not yet incorporated into the HF RCRA Permit were to continue to operate under interim status. Subsequent amendments of the Tri-Party Agreement have retained the RCRA permitting framework addressed by the original 1989 document.

The Hanford Site is a single RCRA facility comprised of over 60 TSD units. The challenge was to develop, for one of the most complex hazardous waste facilities in the nation, a HF RCRA Permit that fulfilled federal and state regulations, allowed efficient TSD unit operations and closures, and was cost effective. The resultant HF RCRA Permit would have as significant an impact on Hanford Site activities as the Tri-Party Agreement. Virtually every program would be impacted in some manner by HF RCRA Permit requirements.

The initial HF RCRA Permit became effective in September 1994, and is comprised of two portions, a Dangerous Waste Portion, issued by Ecology, and a Hazardous and Solid Waste Amendments Portion, issued by the U.S. Environmental Protection Agency, Region 10. The Dangerous Waste Portion is issued to four Permittees: the U.S. Department of Energy, Richland Operations Office, as the owner/operator, and to three of its contractors, as co-operators. The

INTRODUCTION

1 Hazardous and Solid Waste Amendments Portion is issued to the U.S. Department
2 of Energy, Richland Operations Office, as the owner/operator.

3
4 This issuance of the Handbook only addresses permit conditions for the
5 Dangerous Waste Portion.

6
7 The Dangerous Waste Portion of the initial HF RCRA Permit, which
8 incorporated five TSD units, was based on information submitted in the *Hanford*
9 *Facility Dangerous Waste Permit Application* and in closure plan and
10 closure/postclosure plan documentation. The permit modification process will
11 be used at least annually to incorporate additional TSD units as permitting
12 documentation for these units is finalized. The units to be included in
13 annual modifications are specified in a schedule contained in the Dangerous
14 Waste Portion of the HF RCRA Permit. The sitewide requirements are to be in
15 effect over the entire life of the permit. The sitewide requirements address
16 hazardous waste management activities that might not be directly associated
17 with distinct TSD units or that might be associated with many TSD units. The
18 TSD units will remain in interim status until incorporated into the
19 HF RCRA Permit.

20
21 During the development phase of the HF RCRA Permit, discussions with the
22 regulators resulted in an understanding that collaborative problem solving was
23 the key to developing a workable HF RCRA Permit. In support of this
24 understanding, a significant amount of discussion took place from 1992 through
25 1994 (the HF RCRA Permit effective date of September 1994).

26
27 The PSC was established to provide leadership to clarify and to
28 facilitate implementation of the HF RCRA Permit. The PSC consists of members
29 who have been directly involved throughout the development of the HF RCRA
30 Permit and includes representatives from each permittee and from the
31 regulators.

32
33 The PSC schedules monthly meetings in an effort to sustain open
34 communication between the regulators and the permittees, and serve as a focal
35 point for HF RCRA Permit related issues that require clarification or
36 guidance. The PSC meetings are documented in meeting minutes, with guidance
37 or clarification of HF RCRA Permit conditions incorporated into this Handbook.
38 Open issues are, and will be, documented and statused during PSC meetings and
39 resolution guidance incorporated into the Handbook as appropriate.

40
41 As a first step in an effort to provide consistent guidance and
42 clarification of permit conditions, Ecology held a workshop open to all
43 Hanford Site employees. Notes from Ecology's workshop presentations and
44 questions and answers from this workshop serve as an integral part of this
45 Handbook.

USER GUIDANCE

This Handbook is intended to be a focal point for information and in implementing the Hanford Facility (HF) RCRA Permit. This Handbook serves as an ongoing reference available for use by both permittees and regulators to guide the implementation of the HF RCRA Permit.

The Handbook is divided into two sections and one appendix.

- **Section 1.0--Ecology Workshop Presentation.** Ecology held a 2-day workshop October 1994. The workshop consisted of a presentation (Section 1.0) and a question and answer session to address the HF RCRA Permit. The presentation is condensed into 14 general topics.

- **Section 2.0--Permit Condition Guidance Sheets (Guidance Sheets).** Generally, the Guidance Sheets follow the numerical structure provided by the HF RCRA Permit and the upper right-hand corner denotes the start of the individual permit conditions. The initial Guidance Sheets (labeled Presentation) address general topics provided within the HF RCRA Permit introduction and/or other topics useful to the Permittees' field representatives and/or inspectors. A typical Guidance Sheet provides the following elements.

- **Permit Condition--**Verbatim from the HF RCRA Permit, current revision. As permit conditions are added and/or modified through revisions, this element will be updated.
- **Responsiveness Summary--**Summary information from Ecology's Second Responsiveness Summary dated August 29, 1994 is included. Subsequent responsiveness summaries issued with revisions to the HF RCRA Permit will be reflected in this element.
- **Workshop Synopsis--**Permit Condition-specific summary information from the October 1994 workshops is included. Information from future workshops and PSC meetings will be included in this element.
- **Inspection Guidance--**Guidance pertaining to inspections that will be included in this element.
- **Permittee Guidance--**Permittee-specific guidance for implementing permit condition(s).
- **Requirement Summary--**Prescriptive rewording of the Permit Condition to promote compliance. Note that this same wording is used in the Commitment Tracking System (Commitment Library).

Initial implementation of this Handbook and subsequent changes to the guidance information will be processed through the PSC. Sources for Handbook changes include revisions of the HF RCRA Permit, Class I, II, or III modifications, and when the PSC determines that clearer guidance is necessary.

To bring issues or concerns to the PSC for action and possible inclusion in the Handbook, please contact your PSC representative.

USER GUIDANCE

1 When the Handbook is changed, notification of the changes will be carried
2 as a Record of Revision in the front of the document.
3
4

5 PSC Representatives:

6		
7	Bechtel Hanford, Inc.	Janet Badden
8	Pacific Northwest National Laboratory	Harold Tilden
9	Washington State Department of Ecology--Kennewick	Moses Jaraysi
10	Washington State Department of Ecology--Lacey	Joe Witczak
11	Westinghouse Hanford Company	Sue Price
12	U.S. Department of Energy, Richland Operations Office	Cliff Clark
13		
14		

PRESENTATION

1.0 ECOLOGY WORKSHOP PRESENTATION

This section addresses 14 general topics discussed during the October 1994 2-day workshop. This section is a summary of the information presented by Ecology at the October 1994 workshop.

1.1 PERMIT STEERING COMMITTEE

Workshop Synopsis (Oct. 94): An ad hoc committee, PSC, was formed to assist in implementation of the Hanford Facility RCRA Permit. The four Permittees', Ecology representatives, and the EPA's representatives make up this ad hoc committee. When questions come up on what conditions mean, this PSC will interpret the meaning.

If resolutions can not be reached between Ecology inspectors or permit writers and Permittees, the PSC will provide an avenue to resolve these issues. The Handbook has been developed to maintain the facts and agreements reached on individual permit condition compliance. In a question and answer format, the Handbook documents compliance requirements for each Permit Condition. If problems arise with the RCRA Permit, persons should contact the PSC for possible resolution.

1.2 OVERVIEW OF PERMIT

Workshop Synopsis (Oct. 94): The workshop allowed discussion with Ecology concerning implementing the Conditions of the HF RCRA Permit. If the intent of the conditions are understood, compliance with the conditions of the HF RCRA Permit should be easier.

The HF RCRA Permit is a tool; completing 100% compliance with the HF RCRA Permit is not going to solve all the complex problems on the Hanford Facility.

The HF RCRA Permit customizes the regulations for the Hanford Facility and applies the Dangerous Waste Regulations (WAC 173-303) to the Hanford Facility.

1.3 PERMIT HISTORY

Workshop Synopsis (Oct. 94): The HF RCRA Permit is based on 4 years of negotiations with Ecology and the EPA with input from stakeholders. Because of the complexity of the Hanford Facility operations, the HF RCRA Permit was issued as two portions: the Dangerous Waste Portion and the Hazardous and Solid Waste Amendments. The Dangerous Waste Portion is administered by Ecology and the HSWA by the EPA.

PRESENTATION

One part of the Dangerous Waste Portion addresses corrective action. Once Ecology receives authorization for corrective action the HSWA portion will be incorporated into the Dangerous Waste Portion.

1.4 PERMIT STRUCTURE

Workshop Synopsis (Oct. 94): The HF RCRA Permit is divided into two portions with five common parts to each: I. Standard Conditions; II. General Facility Conditions; III. Unit-Specific Conditions for Final Status Operations; IV. Corrective Action for Past Practice; and V. Unit-Specific Conditions for Units Undergoing Closure.

The introduction, not enforceable, contains information regarding dispute resolutions. If there is a problem implementing a Permit Condition, the dispute will use the Dangerous Waste Regulations (WAC 173-303) and, if needed the Pollution Control Hearing Board, the legal entity that hears conflicts between regulators and permittees.

1.5 PART I OVERVIEW

Workshop Synopsis (Oct. 94): Standard Conditions are in Part I, similar to all dangerous waste permits in Washington State. Part I contains administrative conditions.

1.6 PART II OVERVIEW

Workshop Synopsis (Oct. 94): Part II contains conditions that apply to TSD units and the areas in between these TSD units. Ecology views these conditions as the minimum requirements that need to be met on the Hanford Facility. Conditions in Part II can be superseded by unit-specific conditions in Part III and Part V.

The Applicability Matrix (Attachment 3) defines where Part II conditions apply across the Hanford Facility.

Question: Did Ecology say that Parts I and II would be superseded by Parts III or IV or Part V?

Answer: Parts I and II, actually primarily Part II -- I guess you could do Part I -- could be superseded by Parts III and V. But not necessarily. And the default is to follow exactly what Parts I and II say. The Permittees will have to come up with compelling, convincing arguments to the permit writer to do something different. It's possible, and it already exists in some of the units.

PRESENTATION

1.7 PART III OVERVIEW

Workshop Synopsis (Oct. 94): Part III contains unit-specific conditions for operating TSD units.

1.8 PART IV OVERVIEW

Workshop Synopsis (Oct. 94): Part IV contains conditions for corrective action for past practice activities. Part IV will merge with the HSWA Part III when Ecology receives authority for HSWA.

Question: US Ecology was in the original permit. Do they have a separate permit? What's DOE's responsibility?

Answer: The land where the US Ecology site is located is leased to the state of Washington. That lease is administered by the Department of Ecology. The Department of Ecology has a problem if there's a problem at US Ecology. DOE's responsibility is as the landowner, and if both of those parties would be unresponsive to whatever regulations they should be meeting, then the federal government ultimately could end up having to eat the cost if that came to be a situation later on. But right now if anything were to happen, and US Ecology required some action, RL would turn directly to the Department of Ecology and ask them what they planned to do.

Question: Any word on Ecology's HSWA authorization?

Answer: Any day. Ultimately what was going to trigger it was the issuance of this permit.

1.9 PART V OVERVIEW

Workshop Synopsis (Oct. 94): Part V contains unit-specific conditions for TSD units under going closure.

1.10 PERMIT ENFORCEMENT APPROACH

Workshop Synopsis (Oct. 94): Ecology recognizes that the HF RCRA Permit is unique and will take a reasonable approach in implementing conditions. The Facility-wide concept is a new permitting approach and everyone anticipates about a year to fully implement conditions.

If Ecology believes the Permittees are making a sincere effort on how to apply this permit, Ecology will look at those kind of enforcement cases very reasonably because Ecology understands the complexities involved.

1.11 PRIVATIZATION

Workshop Synopsis (Oct. 94): With privatization activities, there will be additional leases to allow people to use land on the Hanford Facility.

PRESENTATION

On the use licenses, the use permits, and the easements, a letter has gone out to all the people who have those telling them that they have to comply with the permit conditions that require reporting of releases.

1.12 CRITICAL SYSTEMS

Workshop Synopsis (Oct. 94): Ecology is writing up agreements as to what critical systems are within any unit being built. The engineering change notices (ECN) related to such systems would be seen and reviewed before finalized and implemented. The ECNs on noncritical systems would be referred to Ecology for review purposes.

For nonconformance reports (NCR), these will be submitted 5 days after identification of the nonconformance. What Ecology is just trying to do is be involved early on the when the contractors are building. This is a minimum requirement that the Permittees have to meet. It's certainly in the Permittees best interest to have Ecology involved so Ecology understands what the Permittees are doing and that agreements are in place before the Permittees go ahead and implement some change on the projects. Construction problems can directly impact the Permittees ability to meet a TPA milestone. Ecology wants to be involved early on in all construction projects.

Question: What about the definition of critical system? Does that come into play there?

Answer: Ecology has allowed units that are coming into the permit to identify critical systems at that unit, and the term critical systems is defined in the definition section of the permit. What it's saying is, if the Permittees make changes to the critical systems, then the Permittees need to let Ecology know or the Permittees need to submit a modification. It was actually written to handle construction projects to decide when Ecology needed to be notified about design changes. That was the real purpose. However now Ecology has kind of expanded it into this to say it's more than just construction projects. So yes, it does come into play, and that's still an option to define critical systems.

Question: This condition; critical system, says we're to provide copies 5 days after, 5 working days after initiating the ECN on critical systems.

Answer: Yes. The initiation of the ECN is when the decision -- not the decision, the engineering solution of the problem has been drafted and sent through the review cycle, that's when the ECN has been initiated.

Question: Ecology wants to see a critical system ECN before it's been approved?

Answer: Yes, and not on all the systems, only the critical systems. Even if it hasn't been dispositioned, by letting Ecology know within 5 days after initiating it, Ecology have the opportunity to take part in the discussions and come to the Permittees meetings or call and find out what's going on because basically Ecology wanted it as a heads-up and Ecology understands it may not always be resolved by the time you notify us.

PRESENTATION

1 Question: What the Permittees are saying is make Ecology a formal part of the
2 NCR process? Is that what you're saying?

3 Answer: Yes, the Permittees will have to in accordance with this. Ecology
4 wanted to do that, but that was viewed by a number of people as
5 going too far. That's why Ecology came up with this language. And
6 really it would be in the Permittees best interest and Ecology's
7 best interest to include the construction inspector, keep Ecology
8 informed as early on in the process as possible.

9 Question: We have a critical system list developed for C-018 and looked very
10 generic. Why can't we use that? Why can't we look at it and see if
11 it's generic enough we can use it?

12 Answer: If you sent it to us we'll look at it.

13 Question: What is the relevancy of critical systems to 616 and 305-B?

14 Answer: ?
15
16

17 1.13 DEFINITION "AT THE FACILITY"

18 Workshop Synopsis (Oct. 94): 19 20

21 Question: Could you comment on what "at the facility" means?

22 Answer: We've talked about that to the extent about whether we consider that
23 to include Seattle or Kent, and we said no. Certainly anywhere on
24 the 560 square miles we would consider the facility. If you wanted
25 to keep them at something not on the facility, which is I think
26 where the administrative record in Richland is, we can accommodate
27 that. That wouldn't be a problem.
28 2440 Stevens is not on-site.
29 But Ecology would allow that to be the house for the records. That
30 was the last Part I condition.
31
32

33 1.14 LEGAL DESCRIPTION

34 Workshop Synopsis (Oct. 94): 35

36 Question: Clarify that the site boundary ends at the 300 Area. What are we
37 talking about for, the 700 area, the 1100 Area, the 3000 Area? All
38 these different areas where there's still waste generated under same
39 EPA number but there is now going to be a new EPA number?

40 Answer: Department of Energy has submitted a request to get new ID numbers
41 for the Federal Building and the 1100 Area. Three other places.
42 The 1100 Area is actually contiguous. The 3000 Area, the 700 Area
43 are the areas where we've asked for new ID numbers.

44 Question: When will this take effect, the different numbers?

45 Answer: Ecology can't issue those numbers. They go up to EPA. Ecology has
46 been asked whether Ecology has a problem with the new ones. Ecology
47 said no, except for the closure of the Simulated High Level Waste
48 Slurry site, which is in the 3000 area. And Ecology didn't want a
49 new EPA number to impact that because that closure is going into the
50 next modification of the permit, which will happen in '95, so
51 Ecology just said we don't care.

PRESENTATION

1 There was a gentleman's agreement that the Permittees could handle
2 it all as if it were contiguous, but the Permittees were never able
3 to get that in writing so the Permittees finally decided we needed
4 to request additional ID numbers.
5 Question: Will there will be an interim status on each of these new areas with
6 these new numbers?
7 Answer: No, there won't be interim status.
8 Interim status only applies to TSD activities, not generating
9 activities.
10 The permit does not apply to the generator sites so they wouldn't
11 need a permit whether they had their own ID number or not.

GUIDANCE SHEETS

2.0 PERMIT CONDITION GUIDANCE SHEETS

The Guidance Sheets are formatted with the verbatim Permit Condition from the Dangerous Waste Portion of the HF RCRA Permit; input and discussions from the Permit's Responsiveness Summary; Permit Workshops (including PSC input); inspection guidance; Permittee (identified) Guidance; and Requirement Summary statement capturing the essence of this information. In some instances, this information needs to be formulated.

GUIDANCE SHEETS

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I.A.1.a.

Permit Condition (Sept. 94): I.A. EFFECT OF PERMIT
I.A.1.a. Effect of Permit

The Permittees are authorized to treat, store and dispose of dangerous waste in accordance with the Conditions of this Permit and in accordance with the applicable provisions of Chapter 173-303 WAC (including provisions of the Chapter as they have been applied in the FFACO). Any treatment, storage, or disposal of dangerous waste by the Permittees at the Facility that is not authorized by this Permit, or by WAC 173-303-400 (including provisions of this regulation as they have been applied in the FFACO) for those TSD units not subject to this Permit, and for which a permit is required by Chapter 173-303 WAC, is prohibited.

TSD units operating or closing under interim status shall maintain interim status until that TSD unit is incorporated into Part III or V of this Permit or until interim status is terminated under WAC 173-303-805(8). Interim status units shall be incorporated into this Permit through the Permit modification process.

Responsiveness Summary: Condition I.A.1.a. states that the Permittees are authorized to treat, store, and dispose of dangerous waste in accordance with the Permit, and with applicable provisions of Chapter 173-303 WAC as they have been applied in the FFACO.

Workshop Synopsis (Oct. 94): Interim status TSD units remain subject to interim status regulations until incorporated into Parts III or V of this Permit.

Condition I.A., Effect of the Permit. You can't treat, store, or dispose of dangerous waste unless it's authorized by the permit or the TSD unit is operating under interim status or the TPA tells you to do something otherwise. Although it's not spelled out, in the Applicability Matrix, there are two conditions that are applicable to interim status units and that's mapping and marking of underground pipes.

This is also the condition that kind of pulls in the permit applicability matrix. The matrix is Attachment 3. The Applicability Matrix should be handed out to people who are concerned with compliance with the permit.

Specifically the permit applies to the five TSD units that are listed in the permit. Any noncompliance that is related to those five units would clearly have to be reported under the provisions of the permit. There are also some other things that make sense to cover in a more general sense, such as training requirements and some requirements for documentation with shipments across the site and with the contingency plan. If there's some area of noncompliance associated with one of those kinds of considerations, then the Permittees would need to report that under the permit as well.

For those TSD units that are operating under interim status, for instance the Central Waste Complex, the obligation is to comply with the interim status regulations.

In many cases, the final status standards of the final status units are identical with interim status units. The purpose of the permit is to customize so in some cases it may be more, or less, stringent because we customize the permit to make it do so.

I.A.1.a.

If you're working in a unit that's not in the permit right now, what you're shooting for is to get your unit there through a permit modification. And if you're an operating unit you'll end up having your specific conditions listed in Part III. If you're a closure unit, your specific conditions will be listed in Part V.

So if you're at a unit that's in the permit, that's where you need to go to look at your very specific requirements for complying with the permit.

Question: Did I also understand you to say that the permit does not apply to interim status facilities, or it does, or it does sometimes? The applicability matrix specifically says that this one does not apply to interim status units, and the interim status regs, don't recall a single thing in them that requires reporting of non-compliance.

Answer: That would be true; if you're non-compliant in an interim status unit, then you don't need to report under this permit. In answer to your question about interim status units; they are out, except for Conditions II.U and II.V which is mapping and marking of underground pipes. Other than that, interim status units have nothing to comply with in the permit.

Question: There were certain activities like generator activities, and TSDs can generate a portion of waste or you can just have maintenance activities, which by themselves are generation activities. I'd like to clarify that those types of activities are excluded.

Answer: The generator activities are not regulated under the permit per se, but they are regulated to the same degree as the maintenance shack or as anybody else in the interstitial area.

Question: For example, in tank farms they have satellite areas in the farms and they're going to put that drum on the road to go to the 90-day pad. That drum was generated as a result of TSD activities in the farm. Surely we wouldn't want to approach that type of movement and activity with respect to the permit conditions.

Answer: To the limit in Footnote 3 we do. Condition II.A. is contingency. Condition II.A. addresses contingency plan, and what it says for the interstitial area, if you have a release in the interstitial area that adversely impacts human health or the environment or threatens human health or the environment, you need to comply with the permit. That's whether it's at a generator, whether it's at a maintenance shack, or whether it's a truck driving that tips over. So generators, themselves, are not being treated any different. Generators as a subset of the interstitial area do have a degree of regulation associated with them.

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Treatment, storage, or disposal of dangerous waste not authorized by RCRA Permit or WAC 173-303-400 is prohibited.

I.A.1.b.

Permit Condition (Sept. 94): I.A.1.b. Effect of Permit - Applicability Matrix

The Conditions of this Permit shall be applied to the Facility as defined by the Permit Applicability Matrix (Attachment 3).

Responsiveness Summary: Refers to Applicability Matrix.

Workshop Synopsis (Oct. 94): Permit Steering Committee (EPA, Ecology-Lacey; Ecology-Kennewick, DOE-RL, BHI, PNL and WHC representation) will control the Applicability Matrix changes. The Applicability Matrix determines enforceability locations.

Basically what that matrix does is split the Hanford Facility into six functional areas, and each one of those areas has a different degree of permit enforceability added.

Across the top of the matrix there's categories A, B, C, D and F. At the bottom of the page, the categories are defined. Category A is leased land. Particularly the Washington Public Power Supply System and the US Ecology site. However, since issuing the permit we've already started fielding some questions about other types of permits or agreements that Energy may have with somebody else that essentially entitles them to use that land. Ecology hasn't made a decision on that, so for today I just wanted you to know that when Ecology mentioned leased lands, Ecology is thinking of WPPSS and US Ecology.

Category B is the North Slope and ALE. Maybe in the near future those two areas will be loped off the site and Ecology wanted to make it convenient to just take those out. There's stars in every one of those, but those you need to read the footnote to see they're not always applicable. They're only applicable if you start doing a treatment, storage, and disposal activity.

Category C is interim status TSD units. That's whether they are nonoperating, and need to go through closure, or whether they're operating.

Category D is areas between the TSDs, excluding any leased lands or North Slope and ALE. Category D is the interstitial area.

What we were trying to capture here is the movement of waste around the Hanford Facility, the fact that although there are discrete treatment, storage, and disposal units, and their operation has impacts across the Hanford Facility. So we're trying to capture some kind of management mechanism to alleviate any problems we have with the innerconnecteness of all those TSDs.

Category E is the TSD unit closures that are found in Part V. There are currently three in the permit. And category F is TSD operating units in Part III. There currently are two of those.

What really complicates the Applicability Matrix are the qualifiers in the far right and the footnotes at the bottom. It's very important to read those qualifiers and footnotes because although there may be a star for the area you're in, the condition may or may not be applicable depending on the circumstances.

So Fred, can you and Janet and Harold get together because Harold is going to have Simulated High-Level Waste Slurry coming up soon that we're going to have to go through this exercise, come up with a flow chart with some descriptive text and regulatory citations.

Question: There was a joint announcement that the North Slope and the Arid Lands Ecology (ALE) was determined to be cleaned up. What

I.A.1.b.

effect does those types of announcements have coming in and looking at the contiguous portion of the properties and downsizing the site?

Answer: It was always Ecology's understanding by the end of this year, that those would no longer be a part of the Hanford Site. When that happens, they won't be contiguous Energy properties and they won't be regulated in the permit. But North Slope and ALE, but once they're no longer part of Energy's property, we'll do a permit modification and knock those out.

Question: What do you mean by boundaries, geographically around the unit?

Answer: We've talked about that issue before. And I think we've done it on a unit by unit basis. For example, I think for 616 they said the boundary was like 100 feet out from the edges of the building. No, we haven't considered that. I haven't put a lot of thought into it. I'd say starting with what's in the Part A application Form 3 is a good place to start as any.

We haven't specifically defined what land area that covers. In some cases the Part A has specific dimensions in it on the Form 3 for a given unit. In other cases it's kind of a very crude map which doesn't define very well what the boundaries of the unit itself would be.

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Compliance with the RCRA Permit will be governed by the Permit Applicability Matrix.

I.A.2.

Permit Condition (Sept. 94): I.A.2. Effect of Permit - Permittee Responsibilities

USDOE is responsible for activities which include, but are not limited to, the overall management and operation of the Facility.

Westinghouse Hanford is identified as a Permittee for activities subject to the Conditions of this Permit where its agents, employees, or subcontractors have operational and/or management responsibilities and control.

PNL is identified as a Permittee for activities subject to the Conditions of this Permit where its agents, employees, or subcontractors have operational and/or management responsibilities and control.

BHI is identified as a Permittee for activities subject to the Conditions of this Permit where its agents, employees, or subcontractors have operational and/or management responsibilities and control.

Responsiveness Summary: Refers to Applicability Matrix.

Workshop Synopsis (Oct. 94): Primarily the Department of Energy has overall responsibility for the Hanford Site. The three contractors that are named are only responsible where they have management or operational control.

These are descriptive statements only, not enforceable requirements.

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Individual Permittee activities determine individual permittee's enforcement responsibilities.

I.A.2.

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I.A.3.

Permit Condition (Sept. 94): I.A.3. Effect of Permit - Coordination With The FFACO

Each TSD unit shall have an application for a final status permit or closure/postclosure plan submitted to the Department in accordance with the schedules identified in the FFACO (Milestone M-20-00). After completion of the permit application or closure plan review, a final permit decision will be made pursuant to WAC 173-303-840. Specific conditions for each TSD unit shall be incorporated into this Permit in accordance with the Class 3 permit modification procedure identified in Condition I.C.3.

Responsiveness Summary: Refers to Applicability Matrix.

Workshop Synopsis (Oct. 94): The Tri-Party Agreement is a driver for the permit. The Tri-Party Agreement does not have any details about specific operation, maintenance, and design of hazardous waste management facilities, so we view the permit as enhancing, complementing the TPA.

The TPA also contains compliance schedules for the Permittees to submit documentation to Ecology to begin building on the permit. But except for a few milestones that talk about construction and operation of some of the larger units, such as the Vitrification plant or Grout, what was envisioned really isn't detailed in the TPA, so that's why the permit was established. It's required by law, it's required by the TPA, and it was needed to complement the TPA and customize the regulations.

This condition also talks about TPA Milestone M-20. That's the compliance schedule in the TPA that requires the submittal of either closure plans or permit applications. This condition states that those TSD units that aren't in the permit now, those at interim status, eventually will be put into the permit and that's how they'll receive approval.

Question: What's the interface with the Tri-Party Agreement and the permit.

Answer: They're both large documents, they both contain a number of requirements for hazardous waste management. And this was actually a point of contention when we were working on the permit. The regulators wanted to say that the permit supersedes the Tri-Party Agreement. The Permittees wanted to say it the other way around, that the TPA always trumps the permit. What we ended up saying in this case was that the permit is intended to be consistent with the TPA. That doesn't say a lot. It's an intention. We've yet to identify any hard cases where there's a conflict between the permit and the TPA and those are the kind of issues that when they're raised we'll have to address on a case-by-case basis.

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Each TSD unit will submit permit applications and plans in accordance with schedules identified in the FFACO (Milestone M-20-00).

I.A.3.

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I.B.

Permit Condition (Sept. 94): I.B. PERSONAL AND PROPERTY RIGHTS

This Permit does not convey property rights of any sort or any exclusive privilege; nor does it authorize any injury to persons or property, or any invasion of other private rights, or any violation of Federal, State, or local laws or regulations.

Responsiveness Summary:

Workshop Synopsis (Oct. 94): No violations of other laws are sanctioned by this Permit.

Condition I.B. is Personal and Properties Rights. That's an administrative requirement that basically says the permit doesn't give you a right to go out and kill somebody because they were violating security of your TSD. The permit doesn't give you any kind of rights.

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: No violations of other laws or permits are sanctioned by compliance with the RCRA Permit.

I.B.

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I.C.1.

Permit Condition (Sept. 94): I.C. **PERMIT ACTIONS**
I.C.1. **Modification, Revocation, Reissuance,**
 or Termination

This Permit may be modified, revoked and reissued, or terminated by the Department for cause as specified in WAC 173-303-830(3), (4), and (5).

Responsiveness Summary:

Workshop Synopsis (Oct. 94): Condition I.C. includes what is use to modify the permit. One thing that's different in Condition I.C. than what is found in other permits is the quarterly submission of certain permit modifications. What the requirement in the regulation is, is a modification that's a Class 1, and doesn't require Ecology pre approval, go ahead and make that modification and let Ecology know in 7 days what happened.

The DOE-RL probably will ask Westinghouse to compile the modifications and the other contractors to provide that information to Westinghouse.

The modifications to the permit were discussed in some sort of detail concerning the 64 or 68 units that are going to be brought into this permit for final status. One modification cycle every year would include whatever permit applications are ready.

The intent was to make those units or these applications ready for insertion into the RCRA Permit in August and go out with a informal public review event or invitation to all those who are interested in these units. The reason for this informal period of review is there will be more than five or six units included every time we modify the permit, which is a huge amount of documentation to review.

To make it easier for the public to review the documents, we thought we would go with this informal period between August and December. In January of each year, we will open the modifications for public comment for 60 days, and then within the 30 days after that we would prepare a responsiveness summary of all the comments we received, and Ecology would make a final decision on the modification.

The minute we announce the modification, it will be made clear to everybody reviewing the documentation that only the portions that are announced to be included or modified into the permit are open for comments. The rest of the permit will stay as it is. It will not be open for comment, only the inserted units and whatever modifications we need to do.

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Ecology may modify, revoke, reissue, or terminate the RCRA Permit for cause as specified by WAC 173-303-830(3), (4), and (5).

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I.C.2.

Permit Condition (Sept. 94): I.C.2. Permit Actions - Filing of a Request

The filing of a request for a permit modification, or revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance on the part of the Permittees shall not stay the applicability or enforceability of any Condition except as provided in WAC 173-303-830(3),(4), and (5).

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Compliance with the RCRA Permit will not be stayed while processing a request or notification for a change to this RCRA Permit.

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I.C.3.

Permit Condition (Sept. 94): I.C.3. Permit Actions - Modifications

Except as provided otherwise by specific language in this Permit, the Permit modification procedures of WAC 173-303-830 shall apply to modifications or changes in design or operation of the Facility or any modification or change in dangerous waste management practices covered by this Permit. As an exception, the Permittees shall provide notifications to the Department required by WAC 173-303-830(4)(a)(i)(A) on a quarterly basis. Each quarterly notification shall be submitted within ten days of the end of the quarter and provide the required information for all such modifications put into effect during that reporting period. Quarterly reporting periods shall be based upon the state Fiscal Year.

Workshop Synopsis (Oct. 94): Quarterly submission of certain Permit modification data is sanctioned.

Question: The modification process that we go through for a Class 1 modification, the Permittees look at the list of things that are potentially Class 1 modifications and every quarter we send you that list of what we think were Class 1 modifications. If after you get that list Ecology determines that one or more of what we thought were Class 1 modifications were really Class 2 modifications, then we've already implemented something that you didn't agree was a Class 1 mod; that would be noncompliance. So should we, along with our Class 1 modification, send a protective notice that says, in the event that you don't agree, that all these are class ones, we'll have a noncompliant situation?

Answer: The modification section in the Dangerous Waste Regulations contemplate that scenario of what happens when you give a Class 1 modification. Going back to this Condition II. R., which is Equivalent Materials. And that basically says the Permittees can go ahead and do the equivalent materials whenever the Permittees want; however, if Ecology comes in and reviews it, disagrees, says it's not equivalent, then Ecology writes to you, tell you why, and you have to go back to the original. And the Permittees would have this same scenario in the permit modifications. Ecology would come back to the Permittees and say no, that's a Class 2 or 3, you need to go back to doing what you were doing.

The following are the causes for any modification for the RCRA Permit: substantial alterations or additions to the permitted unit; the Department receiving new information since the issuance of the permit; changes in the rules and regulations on which the permit was based; modification of compliance schedules due to events beyond the control of the Permittee; modification to closure or postclosure plans; revocation of changes approved before notice of closure; adjustment of the level of financial responsibilities; failure of the specified corrective action program to bring the unit within the groundwater protection standards; inclusion of a detection monitoring program, if the monitoring data collected before the permit issuance indicate that the unit is exceeding the groundwater protection standards; inclusion of conditions applicable to the unit that were not included in the original permit; and when a land treatment unit is not

I.C.3.

achieving complete treatment of dangerous constituents under its current permit conditions.

The regulations have classified the changes or the modifications in to three types: 1, 2 and 3, and that classification was derived from the impact of the change on the operation of a unit.

Class 1 modifications are modifications that have to do with administrative issues concerning the RCRA Permit; the Permittee must notify Ecology within 7 days after the change is put into effect. The Permittee must send, within 90 days of putting the change into effect, a notice of the modification to all persons on the facility mailing list. Ecology may oppose or reject a Class 1 modification. Ecology must inform the Permittee if the Class 1 has been rejected. Certain Class 1 modifications, as listed in Appendix 1, Table 1 in the regulations, are marked and must meet prior approval.

Examples for Class 1 modifications: Informational changes; changes to sampling methods to conform with agency guidance; changes in the name, address or phone number of coordinators or other persons identified in a contingency plan; and replacement of a damaged well in the same location and to the same depth of an old well.

Class 2 modifications are modifications that deal with frequency of doing inspections; frequency of sampling; and the management and operation of the unit. The requirements for a Class 2 modification are the Permittee must submit the modification request that describes the exact change, identifies the modification is a Class 2, explains why the modification is needed, and provides all the additional information required by WAC 173-303-806, -807 and -808.

The Permittees must send a notice of modification to all persons on the facility mailing list and must publish this notice in a major local newspaper 7 days before or after submission of the modification request. Modification includes a 60-day comment period, an announcement of a public meeting, and location for where copies of the modification can be found.

Additional requirements for Class 3 modification are that the Permittee must place a copy of the modification request in a location accessible to the public; and Ecology must, within 90 days, approve or deny the request with a possible extension of 30 days.

Examples are: changes to the frequency or content of the inspection schedules; changes in the emergency procedures; changes in numbers, location or depth or design of permitted groundwater monitoring systems; and modification of a tank unit without increasing the capacity of the existing unit.

For a Class 2 modification, Ecology can request an additional 30 days over the 90 days. That takes us up to 120 days, after which, if Ecology still does not respond, you get automatic authorization to implement the modification until 180 days after submittal of your request. Fifty days before, if you still did not get a decision before the expiration of 180 days, you have to notify the public again that you have been implementing the change. After 120 days, if Ecology still does not respond with a decision, the modification automatically becomes part of the RCRA Permit. This is the major change between a Class 2 and Class 3 modification. This 180 days is not available and this automatic authorization is not available in a Class 3 modification.

I.C.3.

Class 3 modification conditions are very similar to Class 2. The change should completely change the unit physically or change the function of the unit.

Examples, an addition of new container units greater than 25 percent increase in the capacity of the unit; replacement of a surface impoundment unit or changing its storage capacity; or management of different wastes in tanks that require new management practices not mentioned in the original permit.

Question: We have a critical system and it needs to be modified. That would probably be a Class 2 or 3 change. When I saw the schedule this morning, we could be up to a year and a half to be able to make a change. Yet, if we're proposing some better way of working, or something that would be more efficient or safer, and have to wait a year and a half to make the change, that doesn't seem like a very friendly system.

Answer: I agree. RCRA wasn't designed to be friendly. So I guess we continue the way we are, until that year and a half is over, and then we make those changes that could make it safer or more efficient, or whatever. It depends on what the change is, and maybe the way we need to look at this planned changes is a notification to Ecology that this is what the Permittees want to do, and by the way Ecology, do we need to do a permit modification on it?

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Quarterly, following WAC 173-303-830(4), the Permittees will provide notifications to Ecology of Class I Permit Modifications within 10 days following the end of the quarter.

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I.D.1.

Permit Condition (Sept. 94): I.D. SEVERABILITY I.D.1. Effect of Invalidation

The provisions of this Permit are severable, and if any provision of this Permit, or the application of any provision of this Permit to any circumstance is contested and/or held invalid, the application of such provision to other circumstances and the remainder of this Permit shall not be affected thereby. Invalidation of any State statutory or regulatory provision which forms the basis for any Condition of this Permit does not affect the validity of any other State statutory or regulatory basis for said Condition.

Responsiveness Summary:

Workshop Synopsis (Oct. 94): Condition I.D. is Severability. This is an administrative permit condition. If somebody appealed, a condition is severable. The Permittees still have to comply with all the other conditions. If a condition is stayed because it's under judicial review, then you revert back to comply with interim status standards. Appealing (to the Pollution Control Hearing Board) is possible following any adverse Ecology decisions. Dispute an Ecology decision, such disputes should first be discussed by the Permit Steering Committee, but can be appealed to the PCHB.

Question: The PCHB is going to be used, rather than dispute resolution; the PCHB would be the group to come a to decision. Would there then be no formal process between the Permittees and Ecology before that, or just when we get together and disagree, and then go to PCHB?

Answer: One of the simple answers is, we go to PCHB whenever you want to. Ecology would issue some kind of an enforcement order and the Permittees would appeal that to the PCHB. Look at how enforcement and compliance has been working out at Hanford aren't they called like voluntary compliance letters, Ecology sees very few cases where we would just immediately issue an enforcement order.

Now if somebody knowingly, willingly, defies the permit, then maybe we would jump right into an enforcement action.

If you have a question on compliance, that you should be asking internally within your own organizations for guidance on how to comply, and you should certainly be asking DOE -RL for their thoughts on how do you need to proceed with compliance. And if there are questions we can't get answers to through those mechanisms, then we would go to Ecology, Kennewick and ask for their input. It's only going to be after all those things have failed, for whatever reason, that we would get into an enforcement action. We're going to be trying very, very hard to make sure that we don't get into enforcement actions. Since there was no appeal that's pending, all the conditions that you should be concerned with in Parts I, II, III and V are all enforceable, have been enforceable, and are applicable since September 28, 1994.

Dispute resolution per se is not going to be used, if we have disagreement, it would end up at the Pollution Control Hearing Board.

Inspection Guidance:

I.D.1.

Permittee (ID) Guidance:

Requirement Summary: Regardless of the status of other permit conditions, compliance with each individual permit condition is independently enforceable.

I.D.2.

Permit Condition (Sept. 94): I.D.2. Severability - Final Resolution

In the event that a Condition of this Permit is stayed for any reason, the Permittees shall continue to comply with the related applicable and relevant interim status standards in WAC 173-303-400 until final resolution of the stayed Condition, unless the Department determines compliance with the related applicable and relevant interim status standards would be technologically incompatible with compliance with other Conditions of this Permit which have not been stayed, or unless the FFACO authorizes an alternative action, in which case the Permittees shall comply with the FFACO.

Responsiveness Summary: Where the FFACO addresses an interim status requirement, DOE and its contractors may comply with the FFACO rather than with the interim status standard on which the requirement is based. This would also be true if a Permit Condition were stayed.

Workshop Synopsis (Oct. 94): If a Permit Conditions is 'stayed', compliance (for that individual Permit Condition) reverts to the interim status requirement. There won't be any real avenue to formally argue in a legal sense the application or the applicability of the permit unless an enforcement action of some type is taken by Ecology and then we can contest the enforcement action.

If there's a condition that we're not agreeing on, the Permittees could submit a permit modification to try to change that condition, and when we make a determination on that modification, when we say no, we're not going to change it, it's going to stay as is, that condition can be appealed because that's a decision by Ecology. So it's appealable, we could get back into the appeal structure in any case.

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: If for any reason a condition of the RCRA Permit is stayed, compliance will revert to the interim status requirements.

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I.E.1.

Permit Condition (Sept. 94): I.E. DUTIES AND REQUIREMENTS
I.E.1. Duty to Comply

The Permittees shall comply with all Conditions of this Permit, except to the extent and for the duration such noncompliance is authorized by an emergency permit issued under WAC 173-303-804. Any Permit noncompliance other than noncompliance authorized by an emergency permit constitutes a violation of Chapter 70.105 RCW, as amended, and is grounds for enforcement action, Permit termination, modification or revocation and reissuance of the Permit, and/or denial of a Permit renewal application.

Responsiveness Summary:

Workshop Synopsis (Oct. 94): Condition I.E., Duties and Requirements, have both administrative and technical type requirements. There's a general provision that the Permittees need to comply with the permit.

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Comply with all permit conditions.

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I.E.2.

Permit Condition (Sept. 94): I.E.2. Compliance Not Constituting Defense

Compliance with the terms of this Permit does not constitute a defense to any order issued or any action brought under Section 3007, 3008, 3013, or 7003 of RCRA (42 U.S.C. Sections 6927, 6928, 6934, and 6973), Section 104, 106(a) or 107 of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA) [42 U.S.C. Sections 9604, 9606(a), and 9607], as amended by the Superfund Amendments and Reauthorization Act of 1986 (42 U.S.C. 9601 et seq.), or any other federal, state or local law governing protection of public health or the environment; provided, however, that compliance with this Permit during its term constitutes compliance at those areas subject to this Permit for the purpose of enforcement with WAC 173-303-140, WAC 173-303-180, WAC 173-303-280 through -395, WAC 173-303-600 through -680, WAC 173-303-810, and WAC 173-303-830, except for Permit modifications and those requirements not included in the Permit that become effective by statute, or that are promulgated under 40 CFR Part 268 restricting the placement of dangerous waste in or on the land.

Responsiveness Summary:

Workshop Synopsis (Oct. 94): There's language in here that we call "permit as a shield". This is an important concept that says that if you comply with the permit, then you are in compliance with the Dangerous Waste Regulations. So Ecology can't write you a permit, and then you comply with that, and we come back and say you're violating something else in the regulations. Ecology doesn't have a shield from all the Dangerous Waste Regulations, you have a shield from most of those regulations, and it's the ones that apply to TSDs. And the instance where you don't have a shield, say generator requirements that are not in the permit, then the Hanford Facility still needs to comply with those. There's a general requirement to minimize any impacts from noncompliance. The Permittees have a shield from most regulations (those that apply to TSDs). No shield from generator requirements that are NOT in the Permit.

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: If the Permittees are complying with the conditions of the RCRA Permit, the Permittees are complying with the Dangerous Waste Regulations.

I.E.2.

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I.E.3.

Permit Condition (Sept. 94): I.E.3. Duties and Requirements - Duty to Reapply

If the Permittees wish to continue an activity regulated by this Permit after the expiration date of this Permit, the Permittees must apply for and obtain a new Permit, in accordance with WAC 173-303-806(6).

Responsiveness Summary:

Workshop Synopsis: This is an administrative requirement.

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Apply for and obtain a new RCRA Permit to continue a regulated activity beyond expiration of the RCRA Permit.

I.E.3.

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I.E.4.

**Permit Condition (Sept. 94): I.E.4. Duties and Requirements
Permit Expiration and Continuation**

This Permit, and all Conditions herein, will remain in effect beyond the Permit's expiration date until the effective date of the new permit if the Permittees have submitted a timely, complete application for renewal per WAC 173-303-806 and, through no fault of the Permittees, the Department has not made a final Permit determination as set forth in WAC 173-303-840.

Responsiveness Summary:

Workshop Synopsis (Oct. 94): This is an administrative requirement for an automatic 10-year expiration on the permit. Expiration dates typically run anywhere from 5 to 10 years. During the 10 years, we'll probably do quite a number of modifications to the permit, but we won't reissue the whole permit; we'll just be looking at particular sections of the permit. After 10 years, we need to review the whole permit, offer that back to the public, and offer it up to the Permittees to make comments on and consider changing. It doesn't mean it has to change. If the permit is working well, then it won't change at all. But it does provide a definite time that the public is going to get a crack at the whole thing.

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Beyond its expiration date, the conditions of the RCRA Permit remains in effect until a new permit is effective.

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I.E.5.

Permit Condition (Sept. 94): I.E.5. Duties and Requirements - Need to Halt or Reduce Activity Not a Defense

It shall not be a defense in the case of an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the Conditions of this Permit.

Responsiveness Summary:

Workshop Synopsis (Oct. 94): This is an administrative requirement.

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Compliance with the Permit Conditions will not halt or reduce any permitted activities.

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I.E.6.

Permit Condition (Sept. 94): I.E.6. Duties and Requirements - Duty to Mitigate

In the event of noncompliance with the Permit, the Permittees shall take all reasonable steps to minimize releases to the environment, and shall carry out such measures as are reasonable to minimize or correct adverse impacts on human health and the environment.

Responsiveness Summary: The Permittees should not be able to assert their compliance with Condition I.E.6. as a defense to an enforcement action based on a failure to comply with a Condition other than I.E.6. In fact, failing to comply with Condition I.E.6. after failing to comply with another Condition of the Permit would constitute two separate violations of the Permit. Although Ecology believes compliance with Condition I.E.6. cannot be used as a defense to an enforcement action based on a failure to comply with another Permit Condition, it agrees that it is more appropriate to raise this point in the context of an appeal from an enforcement action based on such a failure.

Workshop Synopsis (Oct. 94): Minimize any (adverse) impacts from noncompliance.

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: In the event of a noncompliance with the RCRA Permit, the Permittees will take steps to protect the environment and human health.

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I.E.7.

**Permit Condition (Sept. 94): I.E.7. Duties and Requirements - Proper
Operation and Maintenance**

The Permittees shall at all times properly operate and maintain all facilities and systems of treatment and control which are installed or used by the Permittees to achieve compliance with the Conditions of this Permit. Proper operation and maintenance includes effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls including appropriate quality assurance/quality control procedures. This provision requires the operation of backup or auxiliary facilities or similar systems only when necessary to achieve compliance with the Conditions of the Permit.

Responsiveness Summary:

Workshop Synopsis (Oct. 94): There's a general requirement to properly operate and maintain the facility. There's some specifications stated there, things like adequate lab support, adequate budget; again more of an administrative requirement.

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Properly operate and maintain all facilities and systems to achieve compliance with permit conditions.

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I.E.8.

**Permit Condition (Sept. 94): I.E.8. Duties and Requirements - Duty to
Provide Information**

The Permittees shall furnish to the Department, within a reasonable time, any relevant information which the Department may request to determine whether cause exists for modifying, revoking and reissuing or terminating this Permit, or to determine compliance with this Permit. The Permittees shall also furnish to the Department, upon request, copies of records required to be kept by this Permit.

Responsiveness Summary:

Workshop Synopsis (Oct. 94):

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Provide Ecology records as requested to demonstrate compliance.

I.E.8.

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I.E.9.

Permit Condition (Sept. 94): I.E.9. Duties and Requirements - Inspection and Entry

The Permittees shall allow the Department, or authorized representatives, upon the presentation of Department credentials, to:

Responsiveness Summary: The Department is granted clear access authority by Chapter 70.105 RCW. The Department also recognizes, however, that there may be peculiar security requirements at the Hanford Facility. Accordingly, the Department has agreed to follow certain USDOE guidelines regarding the issuance of security badges, wearing of dosimeters, and completion of radiation protection training, provided that following these guidelines does not interfere with the Department's compliance activities on-site.

Workshop Synopsis (Oct. 94): Inspectors' rights of access to inspect, sample, and copy records need to be followed throughout the Hanford Facility.

This ties in with is Condition I.E.9., Inspection and Entry. This is our inspectors' rights, basically. You need to allow them to enter places on the Hanford Facility that they need to go inspect, have access to records that are required by the permit, to make copies of those records, and to take whatever samples they deem necessary. "The provide information" is again just to provide any information that we may ask for to show that you're in compliance with the regulations.

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: The Permittee will allow Ecology access to the Hanford Facility, records, and sampling and monitoring information upon presentation of Ecology credentials.

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I.E.9.a.

**Permit Condition (Sept. 94): I.E.9.a. Duties and Requirements - Inspection
and Entry by Regulators**

During operating hours and at all other reasonable times, enter and inspect the Facility or any unit or area within the Facility where regulated activities are located or conducted, or where records must be kept under the Conditions of this Permit;

Responsiveness Summary:

Workshop Synopsis (Oct. 94): Refer to Permit Condition I.E.9.

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: During normal business hours, Ecology will be granted access to inspect the portions of the Hanford Facility cover by the RCRA Permit.

I.E.9.a.

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I.E.9.b.

**Permit Condition (Sept. 94): I.E.9.b. Duties and Requirements - Regulator
Inspection and Entry - Times**

Have access to, and copy, at reasonable times, any records that must be kept under the Conditions of this Permit;

Responsiveness Summary:

Workshop Synopsis (Oct. 94): Refer to Permit Condition I.E.9.

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: During normal business hours, Ecology will be granted access to any records covered by the RCRA Permit.

I.E.9.b.

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I.E.9.c.

**Permit Condition (Sept. 94): I.E.9.c. Duties and Requirements - Regulatory
Inspection and Entry - Scope**

Inspect at reasonable times any portion of the Facility, equipment (including monitoring and control equipment), practices, or operations regulated or required under this Permit; and,

Responsiveness Summary:

Workshop Synopsis (Oct. 94): Refer to Permit Condition I.E.9.

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: During normal business hours, Ecology will be granted access to inspect equipment and activities covered by the RCRA Permit.

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I.E.9.d.

**Permit Condition (Sept. 94): I.E.9.d. Duties and Requirements - Regulator
Inspection and Entry - Sampling or
Monitoring**

Sample or monitor, at reasonable times, for the purposes of assuring Permit compliance or as otherwise authorized by State law, as amended, for substances or parameters at any location.

Responsiveness Summary:

Workshop Synopsis (Oct. 94): Refer to Permit Condition I.E.9.

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: During normal business hours, Ecology will be granted access to sample for activities covered by the RCRA Permit.

I.E.9.d.

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I.E.10.a.

Permit Condition (Sept. 94): I.E.10. Duties and Requirements - Monitoring and Records
I.E.10.a. Sampling and Measurements

Samples and measurements taken by the Permittees for the purpose of monitoring required by this Permit shall be representative of the monitored activity. Sampling methods shall be in accordance with WAC 173-303-110 or 40 CFR 261, unless otherwise specified in this Permit or agreed to in writing by the Department. Analytical methods shall be as specified in the most recently published test procedure of the documents cited in WAC 173-303-110(3)(a) through (d), unless otherwise specified in this Permit or agreed to in writing by the Department.

Responsiveness Summary: Condition I.E.10.e. contains one deviation from the regulations that will remain and that is the requirement to specify the affiliation of the individual who performed the sampling or analysis. This change was made to more accurately document the person who is involved in the sampling and analysis activities on the Hanford Facility. With over 16,000 employees, and a variety of contractors doing work onsite, it is very difficult to track an individual by name alone. This Condition will make it possible for regulatory agencies to track sampling and analysis activities onsite, which is the intent of this Condition. The other two deviations from the regulations that were found in the draft Permit will be modified to more accurately portray WAC 173-303-810(11).

Workshop Synopsis (Oct. 94): Ecology is allowing the Hanford Facility to maintain monitoring information on the database.

Question: Has Ecology taken a position as regards to permit self audit as a contractor undertakes, along those same lines regards to administrative violations? For example, if you have an independent self audit and you found that one of your employees was required to have training once a year, had gone 400 days before he had his training and was 30 days over. Is that something you would expect to be reported in the annual versus this 15-day notification?

Answer: Well, the question here is if you yourself the Permittee become aware of non-compliance say before we do, one, would we take enforcement action against something like that through your self evaluation. And I think maybe the scenario you're talking about is you find the guy didn't have training, even though you require the Permittee to have training within six months of hiring. You find the guy at the TSD has been there a year and hasn't had training, so you're out of compliance with the permit, but the very next day you trained the guy and maybe the question is do you still need to report that. Yes, but I'd say in nearly all cases where Ecology see that you have taken steps to rectify situations like that, we'd ever take any enforcement action. And the reason it's important to report it is because then we can start to see general patterns around the site and maybe we see that overall there's a big problem with getting people trained in six months.

I.E.10.a.

Question: Looking from the DOE perspective, we want to encourage contractors to take aggressive and thorough self audits, and we don't want to put them in a situation that they perceive that they're being punished because they've done a good job in implementing the self audit program versus not doing any audit at all so it doesn't become an issue.

Answer: It's a good point and we don't have Ecology policy on that. A lot of that is left up to the discretion of the individual inspectors most inspectors wouldn't take some kind of negative action against you for self assessment because we want to encourage that.

A lot of regulations in the state and the Dangerous Waste regulations are trying to self-implement. We're trying to reduce the number of state employees, and one way that happens is you give the regulation to the regulated community and they comply with it. So I think you're doing the right thing by doing this self-audit, and we shouldn't ding you for it unless it's some kind of gross misconduct or something like that.

The Permittees are trying to develop a compliance tracking system that will be computer LAN based, and we've got it already written and we're alpha testing it now and we will be beta testing some time later this month, and the plan is to have it fully operational on the LAN next calendar year.

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Sampling methods for the purposes of monitoring required by the Permit will be in accordance with WAC 173-303-110 or 40 CFR 261.

I.E.10.b.

**Permit Condition (Sept. 94): I.E.10.b. Duties and Requirements - Monitoring
and Records Management -
Recordkeeping**

The Permittees shall retain at the TSD unit(s), or other location approved by the Department, as specified in Parts III or V of this Permit, records of monitoring information required for compliance with this Permit, including calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, copies of reports and records required by this Permit, and records of data used to complete the application for this Permit for a period of at least ten (10) years from the date of the sample, measurement, report, or application, unless otherwise required for certain information by other Conditions of this Permit. This information may be retained on electronic media.

Responsiveness Summary:

Workshop Synopsis (Oct. 94):

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Retain at the TSD unit, TSD specific records of monitoring for compliance, records and reports required by the RCRA Permit, and records of information used to complete the permit application.

I.E.10.b.

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I.E.10.c.

Permit Condition (Sept. 94): I.E.10.c. Duties and Requirements - Monitoring and Records Management

The Permittees shall retain at the Facility, or other approved location, records of all monitoring and maintenance records, copies of all reports and records required by this Permit, and records of all data used to complete the application for this Permit which are not associated with a particular TSD unit for a period of at least ten (10) years from the date of certification of completion of postclosure care or corrective action for the Facility, whichever is later. This information may be retained on electronic media.

Responsiveness Summary:

Workshop Synopsis (Oct. 94):

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Permittees will retain records of all data used to comply with the conditions of the RCRA Permit for at least 10 years after the certification of completion of postclosure care or corrective action, whichever is later.

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I.E.10.d.

**Permit Condition (Sept. 94): I.E.10.d. Duties and Requirements - Monitoring
and Records - Records Retention**

The record retention period may be extended by request of the Department at any time by notification, in writing, to the Permittees and is automatically extended during the course of any unresolved enforcement action regarding this Facility to ten (10) years beyond the conclusion of the enforcement action.

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: At anytime, the period of time for records retention may be extended by Ecology.

I.E.10.d.

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I.E.10.e.

**Permit Condition (Sept. 94): I.E.10.e. Duties and Requirements - Monitoring
and Records- Records Content**

Records of monitoring information shall include:

- i. The date, exact place and time of sampling or measurements;
- ii. The individual who performed the sampling or measurements and their affiliation;
- iii. The dates the analyses were performed;
- iv. The individual(s) who performed the analyses and their affiliation;
- v. The analytical techniques or methods used; and,
- vi. The results of such analyses.

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Records of monitoring will include specific information including dates, places, names, analytical techniques used, and analytical results.

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I.E.11.

Permit Condition (Sept. 94): I.E.11. Duties and Requirements - Reporting Planned Changes

The Permittees shall give notice to the Department as soon as possible of any planned physical alterations or additions to the Facility subject to this Permit. Such notice does not authorize any noncompliance with or modification of this Permit.

Responsiveness Summary: The language of this Condition is taken from WAC 173-303-810(14). However, the applicability of specific Permit Conditions is discussed in the response to Comment 18.1. Please see that response.

Workshop Synopsis (Oct. 94): Planned changes are where you're required to tell Ecology about any changes you have at your unit. We don't need to know when you paint the door green instead of blue. There's a lot of things we don't need to know that could be construed as a planned unit change. You need to use your best professional judgment in making these calls about whether Ecology needs to be notified or not. A good place to start is to go to our permit modification regulations that are in WAC 173-303-830. That specifically lists changes that need a modification. So certainly if you are changing your unit, or someplace on the Hanford Facility that requires a permit mod, Ecology needs to know about it.

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Give notice to Ecology as soon as possible of any planned physical alterations or addition to the Hanford Facility subject to the RCRA Permit.

I.E.11.

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I.E.12.

Permit Condition (Sept. 94): I.E.12. Duties and Requirements - Certification of Construction or Modification

The Permittees may not commence treatment, storage, or disposal of dangerous wastes in a new or modified portion of TSD units subject to this Permit until:

- i. The Permittees have submitted to the Department, by certified mail, overnight express mail, or hand delivery, a letter signed by the Permittees and a registered professional engineer stating that the TSD unit has been constructed or modified in compliance with the Conditions of this Permit; and,
- ii. The Department has inspected the modified or newly constructed TSD unit, and finds that it is in compliance with the Conditions of this Permit; or
- iii. Within 15 days of the date of receipt of the Permittees' letter, the Permittees have not received notice from the Department of its intent to inspect, prior inspection is waived, and the Permittees may commence treatment, storage, and disposal of dangerous waste.

Responsiveness Summary: The Department has slightly modified the language of the regulations to clarify when the fifteen days begin. As Condition I.E.12.iii. requires the Permittees to submit this information "by certified mail, overnight express mail, or hand delivery", they will know exactly when the material was received by the Department.

Workshop Synopsis (Oct. 94): Certification of construction that applies to units that are in the permit, units going to be expanded or substantially changed, or if a new unit is built under the permit, before use, you have to give Ecology the opportunity to do an inspection. If Ecology does not do the inspection in 15 days, it is automatically approved.

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Do not treat, store, or dispose of dangerous waste in a new or modified portion of a TSD unit until approved by Ecology.

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I.E.13.

Permit Condition (Sept. 94): I.E.13. Duties and Requirements - Anticipated Annual Reportable Noncompliance

The Permittees shall give at least 30 days advance notice to the Department of any planned changes in the Facility subject to this Permit or planned activity which might result in noncompliance with Permit requirements.

If 30 days advance notice is not possible, then the Permittees shall give notice immediately after the Permittees become aware of the anticipated noncompliance. Such notice does not authorize any noncompliance with or modification of this Permit.

Responsiveness Summary: The language of this Condition is taken from WAC 173-303-810(14). Refers to Applicability Matrix.

Workshop Synopsis (Oct. 94): If you see that you're going to have a noncompliance due to planned changes, you need to notify Ecology at least 30 days in advance. If you can't do it in 30 days, if that's just not possible because you didn't know about the change until a week before, then you give us notice as soon as possible.

When you write a permit, what you try to balance is that flexibility versus vagueness. However, it's easier for you to apply, it's easier for me to enforce, if we're very specific and say yeah, 15 days from the time the guy saw the spill occur, he would be calling. Try to balance that flexibility. Here's a place where there is some flexibility and there's some room to decide when who becomes aware.

Question: The question was what does it mean when there's a requirement that says within 15 days of becoming aware of some incident it has to be reported.

Answer: Actually that's one place where we tried to be more specific and say within 15 days of the incident because that would obviously be clear when the incident happened. However, this language is right out of the Dangerous Waste Regulations, and so it was hard for us to argue with the Permittees and say well, we want it within 15 days from the incident. So we ended up mimicking the language in the Dangerous Waste Regulations and saying "becoming aware."

The only reason that language was included is the fact that sometimes you would be out of compliance without knowing it. If you have, for instance, a secondary containment slab that has been breached for any reason and you have not known about it, the inspectors did not catch it in time, but then somebody discovers it, we need to have to give you the flexibility as to when you should have reported this breach so that we don't go and hold you back to the same day it did happen. That's what this was to guard against.

If you're dealing with a specific TSD unit, everyone who works in that unit is supposed to be trained to know what the requirements are for compliance.

If you become aware of a situation where there's a compliance problem, then I think you're obligated to notify within 15 days of any person becoming aware of it. Need to make sure internally you have communication set up so that those non-compliant situations get identified and get on the screen so that they can be properly reported. There are other things that might happen,

I.E.13.

though, where it would be more difficult for that and it gets into some of the areas between the units, for instance.

One of the things we have agreed makes sense, is every 6 months we'll go out and kind of do a general walk-through of the 200 Area to see if anybody has left any orphan drums around, or something like that. We have no way of knowing when a particular drum might have been left someplace. But in the course of one of our inspections we find an orphan drum, we would then have 15 days from the date that we found the drum to make the report.

We would want to go to Ecology and tell them we have a situation that we don't fully understand, but we'll tell you what we know about it now and then we will fill you in with the details as they are revealed to us.

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Notify Ecology 30 days in advance of any planned changes or activities that might result in noncompliance with permit requirements.

I.E.14.

Permit Condition (Sept. 94): I.E.14. Duties and Requirements - Transfer of Permits

This Permit may be transferred to a new owner only if it is modified or revoked and reissued pursuant to WAC 173-303-830(3)(b). The Permit may be transferred to a new co-operator in accordance with the provisions of WAC 173-303-830(2). Before transferring ownership or operation of the Facility during its operating life, the Permittees shall notify the new owner or operator in writing of the requirements of WAC 173-303-600 and -806 and this Permit.

Responsiveness Summary: Ecology does believe that a change in co-operators can be completed as a Class 1 modification with prior approval.

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: If transferring ownership or operation, notify new owner or operator in writing of the requirement of WAC 173-303-600 and -806, and the RCRA Permit.

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I.E.15.a.

Permit Condition (Sept. 94): I.E.15. Duties and Requirements - Immediate Reporting
I.E.15.a. Verbal Reporting

The Permittees shall verbally report to the Department any release of dangerous waste or hazardous substances, or any noncompliance with the Permit which may endanger human health or the environment. Any such information shall be reported immediately after the Permittees become aware of the circumstances.

Responsiveness Summary: The Department has agreed to require "immediate" reporting instead of reporting within two hours. Although this may lead to some ambiguity, this is consistent with the regulations and allows the Department to enforce reporting time requirements of less than two hours should a spill situation necessitate such reporting.

The Department agrees to change the Permit language to reflect that reporting is required after the Permittees become aware of the "circumstances" surrounding the release or noncompliance. Refers to Applicability Matrix.

Workshop Synopsis (Oct. 94): Immediate Reporting is Condition I.E.15. This is a place where Ecology tried to come up with more prescriptive requirements. But we weren't successful in coming up with anything that the facility would agree with, so we're left with some vague terms in there that have always been there, like what's a threat and what's a release and what's immediate. It's a state-wide problem and it's not something the Steering Committee can really resolve; it's going to be done on a case-by-case basis.

The immediate reporting requires the verbal report. In instances where there's a threat, it requires you to put an entry in your operating log, and requires you to mitigate the effects.

Question: It actually says any non-compliance which may endanger human health or the environment. Is that specific language put in there to differentiate between non-compliances that may be administrative versus non-compliance which really does endanger the environment? And also would a permit condition like this also apply to all the TSD units in all of Hanford, as opposed to just the ones in the permit?

Answer: The first part of that question, is this meant to differentiate because it says we're talking about a 15-day RCRA report of danger to human health and the environment. You're correct; when it's human health and the environment you do a RCRA report. This is actually a follow-up to previous Condition I.E.15. which talks about the immediate verbal report and that's for endangering human health and the environment.

So the scenario would be human health and the environment are endangered, the Permittee immediately calls Ecology --- immediate is another can of worms -- but something happens, you call Ecology, and then 15 days later Ecology expects to see something in writing.

Inspection Guidance:

Permittee (ID) Guidance:

I.E.15.a.

Requirement Summary: Immediately report verbally to Ecology any release of dangerous waste or hazardous substances or RCRA Permit noncompliance that endangers human health or the environment.

I.E.15.b.

Permit Condition (Sept. 94): I.E.15.b. Duties and Requirements - Immediate Reports - Verbal Report Content

The immediate verbal report shall contain all the information needed to determine the nature and extent of any threat to human health and the environment, including the following:

- i. Name, address, and telephone number of the Permittee responsible for the release or noncompliant activity;
- ii. Name, location, and telephone number of the unit at which the release occurred;
- iii. Date, time, and type of incident;
- iv. Name and quantity of material(s) involved;
- v. The extent of injuries, if any;
- vi. An assessment of actual or potential hazard to the environment and human health, where this is applicable;
- vii. Estimated quantity of released material that resulted from the incident; and,
- viii. Actions which have been undertaken to mitigate the occurrence.

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: The Permittees shall verbally report to Ecology the nature and extent of any threat to human health and the environment, including the following:

- i. Name, address, and telephone number of the Permittee responsible for the release or noncompliant activity;
- ii. Name, location, and telephone number of the unit at which the release occurred;
- iii. Date, time, and type of incident;
- iv. Name and quantity of material(s) involved;
- v. The extent of injuries, if any;
- vi. An assessment of actual or potential hazard to the environment and human health, where this is applicable;
- vii. Estimated quantity of released material that resulted from the incident; and,
- viii. Actions which have been undertaken to mitigate the occurrence.

I.E.15.b.

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I.E.15.c.

**Permit Condition (Sept. 94): I.E.15.c. Duties and Requirements - Immediate
Reports - Situation Analysis**

The Permittees shall report, in accordance with Conditions I.E.15.a. and I.E.15.b., any information concerning the release or unpermitted discharge of any dangerous waste or hazardous substances that may cause an endangerment to drinking water supplies or ground or surface waters, or of a release or discharge of dangerous waste or hazardous substances or of a fire or explosion at the Facility, which may threaten human health or the environment. The description of the occurrence and its cause shall include all information necessary to fully evaluate the situation and to develop an appropriate course of action.

Responsiveness Summary: The Department agrees to delete the term "potentially" from this Condition.

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: The Permittees will report all information concerning a release or unpermitted discharge to water that threatens human health or the environment.

I.E.15.c.

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I.E.15.d.

**Permit Condition (Sept. 94): I.E.15.d. Duties and Requirements - Immediate
Reports - Operating Record Accounting**

For any release or noncompliance not required to be reported to the Department immediately, a brief account must be entered within two (2) working days, into the TSD operating record, for a TSD unit, or into the Facility operating record, inspection log or separate spill log, for non-TSD units. This account must include: the time and date of the release, the location and cause of the release, the type and quantity of material released, and a brief description of any response actions taken or planned.

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Within 2 working days, enter into the unit or facility logbooks any release or RCRA Permit noncompliance not required to be reported.

I.E.15.d.

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I.E.15.e.

**Permit Condition (Sept. 94): I.E.15.e. Duties and Requirements - Immediate
Reports Release Mitigation**

All releases, regardless of location of release or quantity of release, shall be controlled and mitigated, if necessary, as required by WAC 173-303-145(3).

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Control and mitigate any release.

I.E.15.e.

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I.E.16.

Permit Condition (Sept. 94): I.E.16. Duties and Requirements Written Reporting

Within 15 days after the time the Permittees become aware of the circumstances of any noncompliance with this Permit which may endanger human health or the environment, the Permittees shall provide to the Department a written report. The written report shall contain a description of the noncompliance and its cause (including the information provided in the verbal notification); the period of noncompliance including exact dates and times; the anticipated time noncompliance is expected to continue if the noncompliance has not been corrected; corrective measures being undertaken to mitigate the situation, and steps taken or planned to reduce, eliminate, and prevent reoccurrence of the noncompliance.

Responsiveness Summary:

Workshop Synopsis (Oct. 94): If you look in condition I.E.16. it tells us some things that need to be in the RCRA report, and that's some level of guidance. If you know the answer to all the things that are saying should be in the report, then you're aware of the circumstances. If you come across a drum that was spilled over and somebody was injured because of it, maybe you don't know what caused the drum to spill, but you're aware that a drum spilled. You can use some of those requirements in there as a guideline for when that 15-day clock would start ticking.

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Provide a written report within 15 days to Ecology of any permit noncompliance circumstances that might endanger human health or the environment.

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I.E.17.a.

**Permit Condition (Sept. 94): I.E.17. Duties and Requirements - Manifest
Discrepancy Report
I.E.17.a. Offsite Waste**

For dangerous waste received from outside the Facility, whenever a significant discrepancy in a manifest is discovered, the Permittees shall attempt to reconcile the discrepancy. If not reconciled within 15 days of discovery, the Permittees shall submit a letter report in accordance with WAC 173-303-370(4), including a copy of the applicable manifest or shipping paper, to the Department.

Responsiveness Summary:

Workshop Synopsis (Oct. 94): As far as discrepancies from the shipment you've received from offsite, it's identical to the rest of the state; however, we've added a requirement for a certain amount of documentation to be required for waste moving around the Hanford Facility and that's spelled out in Condition II.Q. If you do have a discrepancy with a strictly onsite shipment, you don't need to call Ecology like you do if it was offsite; you just need to note it in the operating record if you can't resolve it in 15 or 30 days.

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: If a significant discrepancy in a manifest for waste from offsite is not reconciled within 15 days, submit a letter report to Ecology with a copy of the manifest.

I.E.17.a.

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I.E.17.b.

**Permit Condition (Sept. 94): I.E.17.b. Duties and Requirements - Manifest
Discrepancy Report - Onsite Waste**

For dangerous waste which is being transported within the Facility (i.e., shipment of on-site generated dangerous waste), whenever a significant discrepancy in the shipping papers (see Condition II.Q.1.) is discovered, the Permittees shall attempt to reconcile the discrepancy. If not reconciled within 15 days of discovery, the Permittees shall note the discrepancy in the receiving unit's operating record.

Responsiveness Summary: Ecology believes this Condition is warranted because of the dispersed location of the units. Ecology will be satisfied if such discrepancies are documented in the operating record, which will be reviewed by Department inspectors.

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: If a significant discrepancy in a manifest for waste from onsite is not reconciled within 15 days of discovery, note the discrepancy in the receiving unit's operating record.

I.E.17.b.

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I.E.18.

Permit Condition (Sept. 94): I.E.18. Duties and Requirements - Unmanifested Waste Report

The Permittees shall follow the provisions of WAC 173-303-370 for the receipt of any dangerous waste shipment from off-site. The Permittees shall also submit a report in accordance with WAC 173-303-390(1) to the Department within 15 days of receipt of any unmanifested dangerous waste shipment received from off-site sources.

Responsiveness Summary: Should on-site generated waste be received at a unit without the documentation required by Condition II.Q., the Permittees would need to record and report such an event to the Department as noncompliance with the Permit. Therefore, it would be redundant to require a report to the Department through Condition I.E.18.

Workshop Synopsis (Oct. 94): The Unmanifested Reporting, is for shipments received from offsite.

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: For unmanifested waste received from offsite per WAC 173-303-390(1), submit a report per WAC 173-303-390(1) to Ecology within 15 days of receipt.

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I.E.19.

Permit Condition (Sept. 94): I.E.19. Duties and Requirements - Other Noncompliance

The Permittees shall report to the Department all instances of noncompliance not otherwise required to be reported elsewhere in this Permit at the time the Annual Dangerous Waste Report is submitted.

Responsiveness Summary:

Workshop Synopsis (Oct. 94): Condition I.E.19. covers noncompliance that doesn't correct human health and the environment and those you tell us about during the annual report. If you have noncompliance that you weren't required to report anywhere else, we'll take it once a year at the time that your annual dangerous waste report comes in, March 31 of every year.

Dangerous Waste report, Forms 4 and Form 5, are due on March 1st.

This doesn't say it has to be submitted to the same people; it's just at the same time. Those reports go to our Hazardous Waste Program, which is different than our program, the Nuclear Waste Program. Our Hazardous Waste Program isn't interested in seeing your noncompliance report. So what you would do is send both the forms and the noncompliance report to the Kennewick and Lacey offices identified in the permit, and then just those two forms, to the Hazardous Waste Program as you've been doing for years.

Question: To follow up, if we need to rethink whether or not those types of things should go in the annual report for the reasons we've talked about here. Even though people are trying to do an aggressive self assessment program, to catch those things before they become a problem, to maintain good compliance, which everybody agrees that is definitely the proactive way to do things. That list it will end up getting used. Any time we keep statistics on anything, it will get used against us, and the actual context lost. If somebody says 875 problems, if we put that in the context of a million, it's a little different than when you say 875 major compliance problems. We need to rethink whether or not that information needs to go into the annual report.

Answer: I guess I think what I heard Cliff saying was if we do end up noting a problem through compiling it annually, then we probably need to rethink how we're doing business out at Hanford. That's the exact purpose, to put together those kind of numbers, and back to this reasonableness, how do we use those. But if you tell us on an annual basis, the problem probably will not seem as large than if you never tell us and then we will find out through some other avenue or a serious accident occurs. We are not so much worried about the trend. Working on the training plan, last year, we didn't have one.

Question: If I've got 900 people to worry about my training plan, I'm sitting here thinking how many man hours it's going to take me to track every time somebody is one day late on their training for one of their five classes, you see what I'm saying. And how often I would actually add those up to come up with the annual report. And that's something I think Westinghouse and the other contractors have to maybe come up with some kind of

I.E.19.

standard way of doing it because I can see I can spend two full-time people doing nothing but tracking that training plan just so I can total up any discrepancies, and I don't think that's consistent with the intention of the regulation or the permit.

Answer: Right. We're not looking to do that, and that's a legitimate question. That's something that maybe we need to revisit after six months or a year. When you come and say it takes me X number of people to do this and look at the product, what do we get--we get really nothing. It's kind of like balancing your check book and it's not really worth the time to find out the bank ripped you off a penny. But we need to try to comply with the permit in this case which says, if it's a noncompliance, you'll report it and if it truly is a difficulty and costing us a lot of money then we need to rethink it.

Question: I believe two things should be expressed here. One is you pretty well summed up cost benefit of reporting some of this; and the other one, is simply reflecting that the commenters been at Hanford too long. And I have to agree with the commenter. It's been our historical experience that we report numbers and they are not looked at for their significance. So perhaps it's not a matter of reporting some of this as a non compliance so how do we report it. Why are we reporting a raw number, a date, a number versus giving more serious thought to putting this in perspective and reporting it, for example, as a percentage. And giving some statistical significance to it. And historically we've never done this for anything here at Hanford.

Answer: There's another approach to what you're saying. If you're only one day late, and you have 400 people that are one day late, that probably doesn't make any difference.

But that's 400 violations. That's my problem with this.

There's a difference between having 400 people who are one day late and having 10 people who are 400 days late. That would indicate that they just flat out didn't pay any attention to the training requirement. The first situation where you had 400 people one day late would probably be a factor of how many people can we run through a training program in a given period of time.

The worker in the field trained to do what he's supposed to do, and if the guy goes on three weeks' vacation and trains when he comes back, theoretically that's a violation. Is he out in the field untrained? No, he's not. That's what I think we need to look at, the intent, and actually fulfilling the requirement and not get too much involved with the 400 or whatever.

The best way Ecology needs to come to agreement with whether the 3-week vacation is a problem, and the only way we can do that, is initially have you report it and go from there. Now, there's no requirement that says how you have to report it, whether it has to come in a raw number. You can do whatever kind of statistical analysis on your noncompliance you want.

I.E.19.

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Report to Ecology with the annual dangerous waste report all instances of noncompliance not reported elsewhere.

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I.E.20.

Permit Condition (Sept. 94): I.E.20. Duties and Requirements - Other Information

Whenever the Permittees become aware that they have failed to submit any relevant facts in a permit application, closure plan, or postclosure plan, or submitted incorrect information in a permit application, closure plan, or postclosure plan, or in any report to the Department, the Permittees shall promptly submit such facts or corrected information.

Responsiveness Summary:

Workshop Synopsis (Oct. 94): There's also a requirement that new information be provided to Ecology.

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: The Permittees will promptly submit corrective facts to ensure that the RCRA Permit and incorporated documentation contains information that is true, accurate, and complete.

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I.E.21.

Permit Condition (Sept. 94): I.E.21. Duties and Requirements - Reports, Notifications and Submissions

All written reports, notifications or other submissions which are required by this Permit to be sent or given to the Director or Department should be sent certified mail, overnight express mail or hand delivered to:

Nuclear Waste Program
Regulatory and Technical Support Unit
Department of Ecology
300 Desmond Drive
Lacey, Washington 98503
Telephone: (206) 407-7132,

and
Department of Ecology
200 Area Section
1315 West Fourth Avenue
Kennewick, Washington 99336
Telephone: (509) 735-7581

Telephonic and oral reports/notifications need only be provided to the Department's Kennewick Office.

These are the current phone numbers and addresses and may be subject to change. The Department shall give the Permittees written notice of a change in address or telephone number. It is the responsibility of the Permittees to ensure any required reports, notifications or other submissions are transmitted to the addressee listed in this Condition. However, the Permittees shall not be responsible for ensuring verbal and written correspondence reaches a new address or telephone number until after their receipt of the Department's written notification.

Responsiveness Summary:

Workshop Synopsis (Oct. 94): The permit was primarily written out of the Lacey Office with input from the Kennewick Office. The Lacey office would write the permit, and then the permit would be transferred to the Kennewick office for enforcement. It's the Permittees primary responsibility to implement and Ecology's Kennewick office's responsibility to enforce the permit.

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: All written RCRA Permit reports, notifications, or submissions to Ecology will be sent certified mail, overnight express mail, or hand delivered.

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I.E.22.

Permit Condition (Sept. 94): I.E.22. Duties and Requirements - Annual Report

The Permittees shall comply with the annual reporting requirements of WAC 173-303-390(2)(a) through (e) and (g).

Responsiveness Summary: Permit Conditions II.H.1. and II.H.2. require the Permittees to submit closure and post-closure cost estimate reports pursuant to the Department's authority in WAC 173-303-390(3).

Workshop Synopsis (Oct. 94):

Question: Back to the Annual Dangerous Waste Report and where to send them to. The directions say send that report to Olympia. You have a couple of addresses here.

Answer: The question is, where do these annual reports go to. You should continue sending the two reports to the same person/office that you have been for the last X number of years, which is in Lacey, but it's not my office. In addition to that, we would like to start seeing them at those two addresses in the permit, the Condition I.E.21. So you need to send out three copies instead of just one.

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Annual report will be in accordance with WAC 173-303-390(2)(a) through (e) and (g).

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I.F.

Permit Condition (Sept. 94): I.F. SIGNATORY REQUIREMENT

All applications, reports, or information submitted to the Department which require certification shall be signed and certified in accordance with WAC 173-303-810(12) and (13). All other reports required by this Permit and other information requested by the Department shall be signed in accordance with WAC 173-303-810(12).

Responsiveness Summary: Documents requiring certification are those which the Dangerous Waste Regulations or a Permit Condition specifically require to be certified.

Workshop Synopsis (Oct. 94): Condition I.F., Signatory Requirement. If you're submitting a document that's required to be certified, follow WAC 173-303-810(12) and (13) requirements. Any other kind of report that you submit, there's a requirement for who needs to sign those documents. At this point we've been receiving documents with Rasmussen's name on them and that's considered adequate to us.

We're looking at what level of signature needs to be on which documents. And we really have not come to a complete conclusion on how we're going to handle all those things. Regulations under RCRA require a lot more high-level signatures than some of the other environmental regs to do. Basically it has to be signed in many cases by the president of a company, the Laboratory Director in PNL's case, and the Manager of DOE-RL.

(March 3, 1995) During a teleconference submittals to be certified or not certified were identified and agreed to by Ecology-Kennewick and the Permittees. Refer to the following table.

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: All applications, reports, or information submitted to Ecology that require certification will be signed and certified in accordance with WAC 173-303-810(12) and (13). Other reports required by the RCRA Permit will be signed per WAC 173-303-810(12).

I.F.

CONDITION	NO PERMITTEE CERTIFICATION REQUIRED	
I.C.3.	Quarterly Class 1 Modification report	Unit/Facility
I.E.13.	Anticipated noncompliance	Unit/Facility
I.E.16.	Written reporting	Unit/Facility
I.E.17.a.	Manifest discrepancy letter reports (offsite)	Unit/Facility
I.E.18.	Unmanifested waste report	Unit/Facility
I.E.19.	Annual noncompliance report	Facility
II.A.4.	Submittal of admendments of the Hanford Facility Contingency Plan	Unit/Facility
II.D.1. II.D.4.	Amendments to waste analysis plans and sampling analysis plans	Unit/Facility
II.E.4.	Notification of availability to Ecology of all data obtained pursuant to the HF RCRA Permit; notification of routine data collection; notification that routine data are not being collected at the frequency previously specified	Unit
II.O.1.d.	General inspection reports notification	Facility
II.U.1.	Mapping and Marking Report	Facility
II.X.1.	Schedule extensions	Unit/Facility
III.	Operating unit-specific notifications	Unit
V.	Closing unit-specific notifications	Unit
CONDITION	PERMITTEES' CERTIFICATION REQUIRED	
I.E.11.	Notice of planned physical alterations or additions to the Facility	Unit/Facility
I.E.22.	Annual dangerous waste report	Facility
II.A.1.	Written report of incident requiring implementation of Hanford Facility Contingency Plan	Unit/Facility
II.H.1. II.H.2. II.H.3. II.H.4.	Annual report updating projections of anticipated costs for closure and postclosure	Unit/Facility
II.J.3.	Written notification of or request for a permit modification	Unit/Facility
II.U.2. II.U.3. II.U.4.	Mapping updates and reports	Unit
CONDITION	PROFESSIONAL ENGINEER CERTIFICATION REQUIRED	
I.E.12.i.	Certification of construction or modification	Unit
II.L.2.b. II.L.2.c.	Transmittal of ECNs and NCRs	Unit

I.G.

Permit Condition (Sept. 94): I.G. CONFIDENTIAL INFORMATION

The Permittees may claim confidential any information required to be submitted by this Permit, at the time of submission, in accordance with WAC 173-303-810(15).

Responsiveness Summary: Regardless of the fact that federal government documents should be made available for the public, certain information can still be held confidential under provisions of the Privacy Act, patent laws and for reasons of national security.

Workshop Synopsis (Oct. 94): Condition I.G. is Confidential Information. Normally anything given to Ecology public record and anyone can ask to look at it. If you have something because of whatever, national security or proprietary information, trade secrets, you can submit it. There's specific requirements for how to submit that and we don't share it with anybody else.

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: The Permittees will designate any information for confidentiality at the time of submittal in accordance with WAC 173-303-810(15).

I.G.

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I.H.

Permit Condition (Sept. 94): I.H. DOCUMENTS TO BE MAINTAINED AT FACILITY SITE

The Permittees shall maintain at the Facility, or some other location approved by the Department, the following documents and amendments, revisions, and modifications to these documents:

1. This Permit and all attachments;
2. All dangerous waste Part B permit applications, postclosure permit applications and closure plans; and,
3. The Facility Operating Record.

These documents shall be maintained for ten (10) years after postclosure care or corrective action for the Facility, whichever is later, has been completed and certified as complete.

Responsiveness Summary:

Workshop Synopsis (Oct. 94): The permit itself, the application, closure plan, and the operating record need to be maintained at the Hanford Facility. My assumption is this will be complied with by putting the permit and the application with the Facility Operating Record, but I don't know that for sure. But this shouldn't be a big deal to comply with.

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Permit applications, postclosure permit applications, closure plans, permits and all attachments, and the Facility Operating Record will be maintained for 10 years after postclosure care or corrective action, whichever is later.

I.H.

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II.A.1.

Permit Condition (Sept. 94): II.A. FACILITY CONTINGENCY PLAN
II.A.1. Implementation of the Hanford Facility Contingency Plan

The Permittees shall immediately carry out the provisions of the Contingency Plan as provided in Attachment 4, pursuant to WAC 173-303-360(2), whenever there is a release of dangerous waste or dangerous waste constituents, or other emergency circumstance, either of which threatens human health or the environment.

Responsiveness Summary:

Workshop Synopsis (Oct. 94): Condition II.A. is the Facility Contingency Plan. The permit specifies that the Permittees will use the Facility Contingency Plan. It does apply across the site in the interstitial areas. If you're at a unit, the contingency plan applies during any emergency or release. We didn't want to cover all emergencies on the Hanford Facility; for instance, if there's a cafeteria that started to burn, Ecology didn't care about that, but we were concerned about the release of hazardous substances that threatened human health and the environment.

Now the fact that a Facility Contingency Plan exists doesn't mean you don't have to have one for the unit, and I'd say in most cases the Facility Contingency Plan will be insufficient, an insufficient stand-alone document to meet the requirements to have a unit plan. And the way we envision this working is there's a Facility Contingency Plan that you can reference and maybe get 50 percent or 75 percent of your contingency requirements completed, but you're probably going to need a unit-specific plan that has some particulars for the unit that you're in.

Most units would have a copy of the Facility-wide Contingency Plan on the shelf, and then a unit-specific one which maybe does a lot of referencing to the facility-wide.

Question: If there is a building-specific emergency plan such as a building emergency plan or other similar document, if it contains the requisite information in terms of emergency response and other contingency plan requirements, will it be allowed to supersede this contingency plan for the area that it covers? For instance, for one of the buildings in the laboratory, will the building emergency plan, if it contains the requisite information, supersede the Hanford contingency plan or will there be two plans simultaneously in effect?

Answer: The Facility Contingency Plan was put together so you wouldn't have to have another plan at each unit.

The answer to that was that the Facility Contingency Plan and the building-specific plan. When basically put both generic and detailed information together to give them the complete story, and that's what a facility used for their contingency plan.

Question: Can we just use the building plan in lieu of the facility plan and just not have the facility plan there; if the building emergency plan has all the same information, requires the same actions, that the facility contingency plan would do.

II.A.1.

Answer: That would be a problem. We don't have to look specifically. Maybe this is a thing for the Steering Committee to clarify. It says you need to carry out the provisions of the contingency plan. If the provisions of the contingency plan are equally spelled out in an emergency document, and that you did carry out the provisions; then that would meet the requirements.

When compliance inspectors request to see the contingency plan, we encourage the Permittee to bring forth two documents the Hanford Facility Contingency Plan and the appropriate building emergency plan.

Question: From a DOE perspective we have a problem, and that means that every single building emergency plan is going to have to contain everything that's already in the Hanford contingency piece of the overall document. And the DOE emergency plan structure, was to have a tiered series of documents. There was an overall facility-wide plan, there was then a contractor plan, and then there was a building emergency plan and each one dealt with a different level of detail. Am I hearing that PNL is proposing to do something different, Harold? Or what?

Answer: When we were discussing the implementation of this particular condition, we're trying to deal with having two documents on the shelf that perform part of the same function.

In the places where there isn't a building emergency plan, then the Facility Contingency Plan is going to rule. I mean, that's the way we drew it up. But in the cases where there is a building-specific emergency plan, we're going to be pulling two documents off the shelf in an emergency situation.

Question: Would those documents that you're talking about have all the agreements with the outside agencies and everything incorporated into the them?

Answer: A lot of that stuff could be incorporated by the reference.

If you're a TSD unit you need to have the Facility Contingency Plan there. If you're at a 90-day storage area, or if you're the generating unit, you're not subject to the permit except that you need to implement the contingency plan if you have a spill that threatens human health and the environment, or release. We're not requiring that through the permit; We're not saying that every person walking around has to carry a Facility Contingency Plan. We're not saying that at every 90-day or satellite accumulation area or generator location, that contingency plans have to be there posted on the side of the road or anything like that. With regard to enforcement, we're not going to go out there looking for the contingency plans all over. If you're at a satellite accumulation or a 90-day accumulation area and you have a release and human health or the environment were threatened, we're going to look to this condition and say you were supposed to carry out the provisions of the contingency plan. If you took all the appropriate actions, whether you looked at a green book or yellow book, Ecology isn't going to really care as long as you took the appropriate actions. The inspector will ask to see a copy of the contingency plan, and if you're not able to produce one then that in and of itself is a TSD unit regulatory violation.

Inspection Guidance:

Permittee (ID) Guidance: PSC Meeting Minutes (06/01/95).

II.A.1.

Requirement Summary: Immediately implement the contingency plan whenever there is a release or incident that threatens human health or the environment.

II.A.1.

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II.A.2.

**Permit Condition (Sept. 94): II.A.2. Copies of the Hanford Facility
Contingency Plan - Location of Copies**

The Permittees shall comply with the requirements of WAC 173-303-350(4), as provided in the Hanford Facility Contingency Plan (Attachment 4). The Hanford Facility Contingency Plan contains reference to unit-specific contingency plans included in Part III of this Permit.

Responsiveness Summary:

Workshop Synopsis (Oct. 94): Ecology is only concerned when you have a release and somebody gets hurt or killed, did you do the right thing by implementing the contingency plan. We'll just sit back and wait for it to happen and let you worry about how you want to be prepared and who you want to carry these contingency plans around.

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Maintain a copy of the Hanford Facility contingency plan in the Facility Operating Record and at all agencies identified in the contingency plan.

II.A.2.

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II.A.3.

**Permit Condition (Sept. 94): II.A.3. Hanford Facility Contingency Plan -
Change Protocol**

The Permittees shall review and amend, if necessary, the Hanford Facility Contingency Plan, as provided in Permit Attachment 4, pursuant to WAC 173-303-350(5) and in accordance with the provisions of WAC 173-303-830(4). The plan shall be amended within a period of time agreed upon by the Department.

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Permittees will review and amend the Hanford Facility contingency plan pursuant to WAC 173-303-350(5) and per WAC 173-303-830(4).

II.A.3.

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II.A.4.

**Permit Condition (Sept. 94): II.A.4. Hanford Facility Contingency Plan -
Personnel Identification**

The Permittees shall comply with the requirements of WAC 173-303-350(3) and -360(1) concerning the emergency coordinator, except the names and home telephone numbers will be on file with the Occurrence Notification Center, phone number (509) 376-2900.

Responsiveness Summary:

Workshop Synopsis (Oct. 94): Ecology has agreed not to have names and home phone numbers published for use by the public. There's going to be one list compiled that lists an emergency coordinator for each unit, and that's kept at a location on the Hanford Facility that we know we can inspect, be sure it's up to date, and we know the phone number we can call if we need to know who is the emergency coordinator.

It sounds like the Permittees are aware Ecology is not requiring these plans for the 90-day storage areas. Yes, you're required to have a plan through the generator requirements, but not through the permit.

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: For each TSD unit incorporated into the RCRA Permit, the name and telephone numbers (home and work) will be kept on file as provided by the Hanford Facility Contingency Plan.

II.A.4.

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II.B.1.

Permit Condition (Sept. 94): II.B. PREPAREDNESS AND PREVENTION
II.B.1. Preparedness and Prevention - Equipment Lists

The Permittees shall equip the Facility with the equipment specified in the Hanford Facility Contingency Plan (Attachment 4) pursuant to WAC 173-303-340(1). Unit-specific preparedness and prevention provisions are included in Parts III and V of this Permit.

Responsiveness Summary:

Workshop Synopsis (Oct. 94): Condition II.B. is not applicable to the interstitial area.

On a facility-wide basis, this is really dealing with the maintenance of things like the fire station out there, emergency type of equipment that's not at the unit but that a TSD unit is claiming as part of its preparedness, and prevention. Again, the unit may use a combination of facility-wide preparedness and prevention such as one central fire station and then some of their own (TSD unit) preparedness and prevention, a first aid kit, a spill response kit, et cetera.

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Equip the Hanford Facility with the equipment specified in Attachment 4 of the Hanford Facility contingency plan.

II.B.1.

This page intentionally left blank.

II.B.2.

Permit Condition (Sept. 94): II.B.2. Preparedness and Prevention - Equipment Readiness

The Permittees shall test and maintain the equipment specified in the previous condition as necessary to assure proper operation in the event of emergency.

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Test and maintain equipment required to respond to emergencies.

II.B.2.

This page intentionally left blank.

II.B.3.

**Permit Condition (Sept. 94): II.B.3. Preparedness and Prevention -
Communications Alarms**

The Permittees shall maintain access to communications or alarms pursuant to WAC 173-303-340(2), as provided in the Hanford Facility Contingency Plan (Attachment 4) and unit-specific contingency plans.

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Maintain access to communications and alarms as provided in the Hanford Facility contingency plan.

II.B.3.

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II.B.4.

**Permit Condition (Sept. 94): II.B.4. Preparedness and Prevention - Local
Authority Interface**

The Permittees shall comply with WAC 173-303-340(4) and WAC 173-303-355(1) pertaining to arrangements with local authorities.

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Comply with WAC 173-303-340(4) and -355(1) pertaining to arrangements with local authorities.

II.B.4.

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II.C.1.

Permit Condition (Sept. 94): II.C. PERSONNEL TRAINING
II.C.1. Personnel Training - Documentation

The Permittees shall conduct personnel training as required by WAC 173-303-330. The Permittees shall maintain documents in accordance with WAC 173-303-330(2) and (3). Training records may be maintained in the Hanford Facility operating record or on electronic data storage.

Responsiveness Summary:

Workshop Synopsis (Oct. 94): Generally this permit condition says to comply with the regulations regarding training. One thing we do a little bit differently, is that we allow that information to be stored electronically; anywhere else in the state they have hard copies of the records. Due to the volume of the records you have here at the facility, we're allowing them to be electronically stored.

Condition II.C talked about training requirements that "before you get a badge type" training you're going to be given this introductory type training to the Hanford Site.

And the Permittees still have to meet the generator requirements in the dangerous waste regulations. Ecology won't enforce those through the permit, but you still need to meet those.

There is no facility-wide training plan, so each unit is still required to have a unit-specific training plan. There's also a requirement in here to train visitors and subcontractors, basically anybody who comes on site has a right to know they're entering a site that conducts hazardous waste management activities.

Question: Just a clarification on the training question, when is it really a noncompliance? If someone has an annual training requirement and they're a few days late meeting that requirement, is that a noncompliance or is it only a noncompliance if their training is not current and they are doing a dangerous waste management activity? Their training is lapsed, but they're not actually doing a dangerous waste management activity. Is that truly noncompliance just because they didn't keep their annual training requirement up to date?

Answer: The basic requirement is to comply with the Dangerous Waste regulations WAC-173. You'd have to look specifically there and see what does it say. If you're working at the TSD you need to have that. If you're no longer working there, the training is no longer required. I see what you're saying.

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Conduct personnel training and maintain documents according to WAC 173-303-330.

II.C.1.

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II.C.2.

Permit Condition (Sept. 94): II.C.2. Personnel Training - New Hire Training

All Hanford Facility personnel shall receive general Facility training within six months of hire. This training shall provide personnel with orientation of dangerous waste management activities being conducted on the Hanford Facility. This training shall include:

Responsiveness Summary: Training will not be required for personnel at the Federal Building or other downtown offices as they are not working on the Facility.

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Within 6 months of hire all Hanford Facility personnel will receive an orientation on dangerous waste management activities on the Hanford Facility.

Comment: 02/05/95 decision to delete "and Annual Refresher" from the II.C.2. title and "and annually thereafter," from the conditional clause of the Requirement Summary was made by R.C. Brunke and B.D. Williamson of WHC in consultation with H.T. Tilden (PNNL) and R.J. Landon (BHI).

II.C.2.

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II.C.2.a.

Permit Condition (Sept. 94): II.C.2.a. Personnel Training - Training Content

Description of emergency signals and appropriate personnel response,

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Personnel training will include descriptions of emergency signals and appropriate employee responses.

II.C.2.a.

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II.C.2.b.

Permit Condition (Sept. 94): II.C.2.b. Personnel Training - Training Content

Identification of contacts for information regarding dangerous waste management activities,

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Personnel training will include the identification of contact personnel regarding dangerous waste management activities.

II.C.2.b.

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II.C.2.c.

Permit Condition (Sept. 94): II.C.2.c. Personnel Training - Training Content

Introduction to waste minimization concepts,

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Personnel training will include an introduction to waste minimization concepts.

II.C.2.c.

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II.C.2.d.

Permit Condition (Sept. 94): II.C.2.d. Personnel Training - Training Content

Identification of contact(s) for emergencies involving dangerous waste, and

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Personnel training will include the identification of contact(s) for emergencies.

II.C.2.d.

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II.C.2.e.

Permit Condition (Sept. 94): II.C.2.e. Personnel Training - Training Content
Familiarization with the Hanford Facility Contingency Plan.

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Personnel training will include familiarization with the Hanford Facility contingency plan.

II.C.2.e.

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II.C.3.

**Permit Condition (Sept. 94): II.C.3. Personnel Training - Unit-Specific
Training Content**

Description of training plans for personnel assigned to TSD units subject to this Permit are delineated in the unit-specific chapters in Parts III or V of this Permit.

Responsiveness Summary: See the response in Comment 18.1.

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Personnel training for unit-specific training content will be delineated in unit-specific chapters in Parts III or V of the RCRA Permit.

II.C.3.

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II.C.4.

Permit Condition (Sept. 94): II.C.4. Personnel Training - Visitors

The Permittees shall provide the necessary training to non-Facility personnel (i.e., visitors, sub-contractors) as appropriate for the locations such personnel will be at and the activities that will be undertaken. At a minimum, this training shall describe dangerous waste management hazards at the Facility.

Responsiveness Summary:

Workshop Synopsis (Oct. 94): Everybody who walks on the Hanford Facility has a right to know that there's dangerous waste management activities. And that's more of a community right to know thing than anything else.

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Provide necessary training to non-facility personnel (visitors and vendors) as appropriate for locations and activities for which personnel will be associated.

II.C.4.

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II.D.1.

Permit Condition (Sept. 94): II.D. WASTE ANALYSIS
II.D.1. Waste Analysis - WAPs and SAPs

All waste analyses required by this Permit shall be conducted in accordance with a written waste analysis plan (WAP) or sampling and analysis plan (SAP). Operating TSD units shall have a WAP, which shall be approved through incorporation of the TSD unit into Part III of this Permit. Closing TSD units shall have a SAP and, if necessary, a WAP which shall be approved through incorporation of the TSD unit into Part V of this Permit.

Responsiveness Summary:

Workshop Synopsis (Oct. 94): Condition II.D., Waste Analysis. If you're an operating TSD, you need to have a waste analysis plan (WAP). If you're a unit that's closing, you need to at least have a sampling and analysis plan (SAP). If there's still waste in a unit that's going to be closed, you also need to have a WAP. So an operating unit needs at least a WAP, and a closing unit needs at least a SAP and also maybe it needs a WAP.

This condition goes on to provide some prescriptive requirements for what needs to be in a WAP and what needs to be in a SAP. And the final part of this, the last condition in II.D., talks about waste analysis that's required for the permit outside the TSD, and this is in the interstitial area. And once again, the example is there's a facility-wide inspection conducted, you come across an orphan drum and you're going to take samples, you need to somehow document what you're doing there.

Question: We're talking about units that are specifically in the permit now. We have submitted revised WAPs for both 616 and 305-B that we were going to try and incorporate in the next modification of the permit. So are we still planning to do that? That's been my assumption that's that what we were going to do. It's to our benefit because I think we can fix a lot of these problems in the next modification even if we have to make some additional changes to those WAPs submittals. So instead of going through a whole lengthy drill of getting all these things into permit implementation guidance and all of that, maybe we ought to just take some actions out of here to get those permit -- WAP submittals updated and correct these in the next modification, not the one we're talking about doing November but the one after that.

Answer: Oh, yeah, for sure by that modification you're talking about the '96 modification.
Two different ways to do it. One is to put it in the WAP, and I think that makes the most sense, and the other is to put it into the contingency plan.
But if we needed to put some condition in the WAP to deal with, we could write a little caveat into the WAP.
Careful, because if you go into the general conditions of information required in a WAP.

From the inspector's point of view if you walk in say once a week or once every couple weeks you've got confirmation data for him to look at, I would think that would be a lot better than catching you at just that right time of the month to get the data for that month. It sounds like, and I don't know

II.D.1.

how often you've got drums, 20 drums coming in, but it sound likes it's going to occur more frequently over the month than the once. It makes your resource loading a little easier for you and that way which ever inspector can walk in there on any day and have relatively fresh data to look at from these drums. I don't recall how we got into all of our discussions on how to come up with this, but if it's as simple as 1 in 20 we would have done it that way.

One in 20 I can understand. Again, what we were trying to do is account for the randomness of the receipt of containers, because there is no such thing as a normal amount of containers that come into the facility. We can calculate a ruling average over some historical period of time, but it's not necessarily logical to anticipate that roughly the same numbers of containers are going to come in each month.

To make sure that we didn't sample 2 percent in 1 month of the containers received and 50 percent of the containers received in another month because of the bumpiness of the number of containers received, we went to this rolling average sort of concept to ensure that we get 5 percent over the course of the longer aspect.

Now, if 1 in 20 does the same thing, so if everybody is comfortable with that, well, good. I think there should be some allowance made to do it on the rolling average if people want to do that.

I think you can do 1 in 20. I think that every quarter you could maybe do a calculation to verify your 1 in 20 method met this or something, put a little thing in your operating record we did 1 in 20, every 20 drums we sampled 1 of them. If you find at the end of the quarter that your 1 in 20 method, which I don't think mathematically cannot work, but if you find that it was screwed up or something, you put in the operating record we sampled 2 extra drums to do some makeup, this didn't work. We got 119 drums and the average of it means that we only got 4.9 percent drum so we did a bonus drum.

And this makes it easier on our inspectors too.

The only other issue we had was try to get a feel for a potential permit mod before we make a change, anticipated change, and if we bounce it off you guys it looks like it's a class 2 we just implement, just keep operating. But in section IV we describe all our segregation in storage, which is based on the old Department of Transportation hierarchy, which is changed since the permit application or that part of it was prepared. We would like to tweak that a little to reflect the new hierarchy and we've got stuff stored in ORM, other regulated materials with a big sign that says ORM. We'd like to adjust that, change some cabinets around and put it in the new hierarchy if we're adding a shelf here or there, changing some signs. Segregating. Is that a major process change? It is a class 2 modification.

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: All waste analysis shall be conducted in accordance with a written waste analysis plan (WAP) or sampling plan (SAP). TSD units shall have a WAP, closing operating TSD units shall have a SAP, and if necessary, a WAP.

II.D.2.

Permit Condition (Sept. 94): II.D.2. Waste Analysis - Final Status Unit Prohibitions

Until a WAP is implemented in accordance with Condition II.D.1., any unit(s) identified in Parts III or V of this Permit without a unit-specific waste analysis plan approved by the Department shall not treat, store, or dispose of dangerous waste, unless specified otherwise by the Department in writing.

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: TSD units without an Ecology approved unit-specific WAP will not treat, store, or dispose of dangerous waste.

II.D.2.

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II.D.3.

Permit Condition (Sept. 94): II.D.3. Waste Analysis - WAP Content

Each TSD unit WAP shall include:

- i. The parameters for which each dangerous waste will be analyzed, and the rationale for selecting these parameters;
- ii. The methods of obtaining or testing for these parameters;
- iii. The methods for obtaining representative samples of wastes for analysis (representative sampling methods are discussed in WAC 173-303-110(2);
- iv. The frequency with which analysis of a waste will be reviewed or repeated to ensure that the analysis is accurate and current;
- v. The waste analyses which generators have agreed to supply;
- vi. Where applicable, the methods for meeting the additional waste analysis requirements for specific waste management methods as specified in WAC 173-303-630 through 173-303-670; and,
- vii. For off-site facilities, the procedures for confirming that each dangerous waste received matches the identity of the waste specified on the accompanying manifest or shipping paper. This includes at least:
 - (1) The procedure for identifying each waste movement at the Facility; and,
 - (2) The method for obtaining a representative sample of the waste to be identified, if the identification method includes sampling.

Responsiveness Summary: [vii] This Condition is identical to the language in the regulation (WAC 173-303-300(5)(g)). The Condition is referenced by the phrase "For off-site facilities" which makes it clear that this Condition is only applicable to waste from off-site sources.

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Each TSD unit WAP will include analysis parameters, methods of analysis, sampling methods, analysis frequency, generator analysis, methods for meeting additional waste analysis, and confirming procedures for facilities.

II.D.3.

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II.D.4.

Permit Condition (Sept. 94): II.D.4. Waste Analysis - Areas Between TSDs

Should waste analysis be required by this Permit at a location on the Facility other than at a TSD unit, a SAP shall be maintained by the Permittees and made available upon request from the Department. Any SAP required by this Permit not associated with a particular TSD unit shall include the elements of Conditions II.D.3.(i) through II.D.3.(iv).

Responsiveness Summary: As stated in the response to Comment 18.1, the Department considers the entire Hanford Site to be the Facility. Therefore, waste analysis conducted outside of a TSD could be subject to this Permit. If it is, then this Condition applies. Two examples where waste analysis might be required outside of a TSD would be a release from a TSD that migrated outside the TSD boundary or an orphan drum found outside of a TSD during an inspection required by Condition II.O.

Workshop Synopsis (Oct. 94): Condition II.D.4. is waste analysis that's required outside of a TSD. If you have a release, and you drum it up, you have to sample and analyze it. Or you do one of your facility-wide inspections and you find an orphan drum, and you have to sample and analyze it, and this is in the interstitial area. Ecology is saying that you need to have a piece of paper that records how many samples you took, what you looked for, that kind of stuff. So that's another example. There is an example of the situation that we're involved in right now, where it would be really nice if we had one of these, even a single sheet paper, that we don't have and now we've got a problem. Now I'll describe it to you so you get a sense of how simple things can sound and how complicated they can be.

When they were digging the excavation for EMSL, they ploughed out a buried tank. I'm not sure whether it was a tank that was there on purpose, or whether it was one that somebody ran over with a caterpillar and just left there. But they ploughed it out, they punched a hole in it, and some stuff came out. They dug up the stuff and checked to see if they could get any readings on it. When they didn't get anymore readings, they considered it done and proceeded with business. They excavated 2 more feet and in the meantime took the tank and set it on a pallet, grabbed some visquine, and did some things with the waste they dug up.

But the problem they've got now is they don't know whether the soil is clean and whether it can be declared clean. If they had taken a few minutes writing the SAP, and gotten the samples at the time, we'd have good, hard data that we'd be able to use to show that we actually did the cleanup and there wasn't anything left. As it is now, we're in a situation where we're having to go to Ecology and ask them to help us figure out a way to get this problem dealt with in a manner that doesn't impact the construction schedule for EMSL.

It seemed like a really simple situation at the time, that the constructor took the tank and put it on a pallet, dug up a little bit of dirt, and it was clean. Now we have a regulatory situation that's more difficult to close out, that we don't have hard data that we probably would have gotten if we had a SAP, even a quick one done on the spot.

Inspection Guidance:

Permittee (ID) Guidance:

II.D.4.

Requirement Summary: Before sampling for compliance with the RCRA Permit, a WAP or SAP will be in place.

II.E.1.

Permit Condition (Sept. 94): II.E. QUALITY ASSURANCE/QUALITY CONTROL
II.E.1. QA/QC - WAPs and SAPs

All WAPs and SAPs required by this Permit shall include a quality assurance/quality control (QA/QC) plan or equivalent to document all monitoring procedures so as to ensure that all information, data, and resulting decisions are technically sound, statistically valid, and properly documented. Each QA/QC plan shall include, or contain a reference to another document which will be used and includes, the elements defined in Conditions II.E.2. and II.E.3. The QA/QC plan may be part of a SAP, WAP, or equivalent.

Responsiveness Summary: This Condition is not applicable to interim status units at the Facility. It only applies to QA/QC activities under the permit. Furthermore, the language chosen allows for the use of equivalent documents.

Workshop Synopsis (Oct. 94): Condition II.E., Quality Assurance and Quality Control (QA/QC). This condition requires that if you have a WAP or you have a SAP you need to have a QA/QC plan or equivalent. The condition also allows you to reference other documents. Sometimes your reference may be a lab manual, something the lab does as part of your QA/QC, maybe there's a health and safety plan, anything else. I understand there's situations where there are some central documents that are used in developing a QA/QC plan or used in lieu of a QA/QC plan, and the permit says that's okay. There's, again very prescriptive requirements for what should be in a QA/QC plan.

The condition also goes on to say that as data becomes available, you need to notify Ecology and say yes, here's the data and what triggers that is the receipt of the data in completion of QA/QC. And finally the last condition in II.E. discusses the use of the data quality objective process, the DQO process, and basically says if you go through the DQO process and receive Ecology approval, that's what we can use; in essence in lieu of anything else in that condition.

One of the things that happened in the past was that plans from the labs were not obtained and made part of the records. You want to have some kind of documentation that you've at least checked at the lab to make sure they have that kind of a plan in place and it's implemented. The best thing is to actually have a copy. But you can't be incorporating their entire plan, because every time they want to make a change, then you have to make a change. That's not the reasonable thing to do.

Ecology doesn't have an answer for you. I'm going to tell you what I tell everybody else, I accept that at face value and I've never looked at QA/QC myself. I'm not familiar with QA/QC plans. I've written it down as something we need to look at and try to address that concern.

Question: Do you want the lab's QA/QC plan incorporated into the SAP?

Answer: No, it doesn't have to be. The point we're trying to make here, if you have a SAP you need to have a QA/QC plan. Maybe what you do for your QA/QC plan you have a one-page document that says my QA/QC plan exists, it's made up of the lab QA/QC, the sampling team's QA/QC. Does that make sense? That's an example. I'm not saying the lab QA/QC part is necessarily going to have to be part of a SAP or WAP.

It would have to be part of the QA/QC plan, the lab plan. Quite frequently you'll get the labs, hire them after you've

II.E.1.

already got your QA/QC plan done. You don't specify the requirements for the lab plan, but you'll have the lab plan in there.

Question: I'm not sure, have you looked at all the individual requirements in this condition for QA/QC? There's pages of it, and I don't recall offhand whether they talk about it being a necessity to have all the lab QA/QC information.

Answer: I don't think it does. I think what it basically lays out is what the lab QA/QC plan is going to have to cover. I think it said you have to have a QA/QC plan and it covers all these items. I had the impression the lab plan had to be in there as well.

If does need to be in there, I think what the condition says is that you can just reference that document, you don't have to physically have it there. If that is a requirement you can just reference that document.

We're probably going to have to make a change, have that QA/QC plan done before you even decide what lab you use. Then you may change labs in the middle of the stream.

And you're saying the second lab may not be able to meet the requirements.

They may use a different QA/QC plan. One of the reasons why you might change laboratories is the first one wasn't doing an adequate job with QA/QC, in which case you probably want to have a different plan for them.

One of the ways that can be addressed is that you can state that not only are you going to use labs that can provide that type of documentation to you, that can provide a lab QA/QC plan, but you can say you're going to use surveillance or assessment type activities to make sure they have it. You can talk about it without actually referencing a particular lab. You can say what your expectations are for the lab that you're going to use and carry through and actually make sure that those things exist without having to revise.

In your laboratory procurement package you can basically specify what the QA/QC requirements are that have to be met, and if the lab can't meet those, then you don't hire them. That's normally the way you do it. I don't see a need to have the specific lab plan in with the QA/QC plan, which I think insinuates you have to.

Question: Has RL talked with Ecology about the QA/QC approach of the future? What I'm thinking about is the new Hanford Analytical Services Quality Assurance Program Plan (HAS QAPP) document and the efforts associated with HAS QAPP.

Answer: HAS QAPP was not part of the permit discussion. That document has been transmitted to Ecology, and if I remember right the transmittal letter basically said this is what we're doing, let us know if you have any problems with it. We haven't heard anything back yet. We haven't really sat down and talked with Ecology about how we're doing QA through the HAS QAPP

II.E.1.

Because writing some of these things maybe impacted, maybe DOE-RL wants to come forward. By making a recommendation, and addressing this permit condition.

One of the things that the Permittees all need to understand is that when we were talking these permit conditions with Ecology, the fact that we didn't contest this particular element of the permit, was based on a premise that we were going to go back and revisit this when we got to actually evaluating the WAPs for 616 and 305-B that had been incorporated. And we may very well go back and change this part of the permit. I think that that's still something that's potentially doable as part of a permitted facility, to look at this whole thing and make sure that it makes sense. We didn't have the HAS QAPP document. That just was finalized, actually it was finalized and immediately reopened for comments again. But that was just finalized what, a month and a half ago? So it wasn't part of the discussions that we had on this. Now that we have that, we would have a better argument for getting some of these conditions changed.

And the way Ecology came up with this one, this is one where, originally I believe, Energy submitted a facility wide QA/QC plan. If you go back to our first draft, we just made a hundred changes to that plan. And then we ended up coming to agreement there doesn't need to be a facility wide QA/QC plan; we just need to have requirements in the permit.

So what we did is lift these requirements out of EPA's permit. I can't tell you where EPA got this. My guess is they have some kind of guidance document and came up with all this language, and that's the source of these requirements. And that's why I'm not really familiar intimately with what they're asking for, as the gentleman is asking do we really need to have the lab QA/QC manual in here or not. That's why I can't answer that. But that's kind of a history where this condition came from.

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: WAPs and SAPs will contain a QA/QC plan or equivalent so that all monitoring procedures and data are documented and are technically defensible.

II.E.1.

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II.E.2.

Permit Condition (Sept. 94): II.E.2. QA/QC - Content - Data Quality Assurance Plan

Each QA/QC plan shall contain a Data Quality Assurance Plan which includes the following:

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Each QA/QC Plan will incorporate a data quality assurance plan.

II.E.2.

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II.E.2.a.

Permit Condition (Sept. 94): II.E.2.a. QA/QC - Content - Data Collection Strategy

A Data Collection Strategy section including, but not be limited to, the following:

- i. A description of the intended uses for the data, and the necessary level of precision and accuracy for these intended uses; and,
- ii. A description of methods and procedures to be used to assess the precision, accuracy, and completeness of the measurement data;

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Each QA/QC Plan will include a data collection section as defined by RCRA Permit Condition II.E.2.a.

II.E.2.a.

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II.E.2.b.

Permit Condition (Sept. 94): II.E.2.b. QA/QC - Content - Sampling Section

A Sampling section which shall include or describe and reference or cite:

- i. Sampling methods including the identification of sampling equipment, a description of purging procedures, and a description of decontamination procedures to be used;
- ii. Criteria for selecting appropriate sampling locations, depths, etc., or identification and justification of sample collection points and frequencies;
- iii. Criteria for providing a statistically sufficient number of samples as defined in EPA guidance or criteria for determining a technically sufficient number of measurements to meet the needs of the project as determined through the DQO planning process;
- iv. Methods for, or specification of, measuring all necessary ancillary data;
- v. Criteria for, or specification of, determining conditions under which sampling should be conducted;
- vi. Criteria for establishing, or specification of, which parameters are to be measured at each sample collection point and the frequency that each parameter is to be measured;
- vii. Criteria for, or specification of, identifying the type of sampling (e.g., composites vs. grabs) and number of samples to be collected;
- viii. Criteria for, or specification of, measures to be taken to prevent contamination of the sampling equipment and cross contamination between sampling points;
- ix. Methods and documentation of field sampling operations and procedure descriptions, as appropriate, including:
 - (1) Documentation of procedures for preparation of reagents or supplies which become an integral part of the sample (e.g., filters and absorbing reagents);
 - (2) Procedure descriptions and forms for recording the exact location, sampling conditions, sampling equipment, and visual condition of samples;
 - (3) Documentation of specific sample preservation method;
 - (4) Calibration of field devices;
 - (5) Collection of replicate samples;
 - (6) Submission of field-biased blanks, where appropriate;
 - (7) Potential interferences present at the facility;
 - (8) Field equipment listing and sample containers;
 - (9) Sampling order; and,
 - (10) Descriptions of decontamination procedures.
- x. Selection of appropriate sample containers, as applicable;
- xi. Sample preservation methods, as applicable; and,
- xii. Chain-of-custody procedure descriptions as applicable, including:
 - (1) Standardized field tracking reporting forms to establish sample custody in the field prior to and during shipment; and,
 - (2) Pre-prepared sample labels containing all information necessary for effective sample tracking, except where such information is generated in the field in which case blank spaces shall be provided on the pre-prepared sampling label.

II.E.2.b.

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Each QA/QC Plan for sampling will have a sampling section that address RCRA Permit Condition II.E.2.b. requirements.

II.E.2.c.

Permit Condition (Sept. 94): II.E.2.c. QA/QC - Content - Field Measurements Section

Where applicable, a Field Measurements section which shall address:

- i. Selecting appropriate field measurement locations, depths, etc.;
- ii. Providing a statistically sufficient number of field measurements as defined in EPA guidance or criteria for determining a technically sufficient number of measurements to meet the needs of the project as determined through the DQO process;
- iii. Measuring all necessary ancillary data;
- iv. Determining conditions under which field measurements should be conducted;
- v. Determining which media are to be addressed by appropriate field measurements (e.g., ground water, air, soil, sediment, etc.);
- vi. Determining which parameters are to be measured and where;
- vii. Selecting the frequency of field measurement and length of field measurements period; and,
- viii. Documenting field measurement operations and procedures, including:
 - (1) Descriptions of procedures and forms for recording raw data and the specific location, time, and sampling conditions;
 - (2) Calibration of field devices;
 - (3) Collection of replicate measurements;
 - (4) Submission of field-biased blanks, where appropriate;
 - (5) Potential interferences present at the facility;
 - (6) Field equipment listing; and,
 - (7) Descriptions of decontamination procedures.

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Each QA/QC Plan for sampling will have a field measurements section that addresses RCRA Permit Condition II.E.2.c. requirements.

II.E.2.c.

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II.E.2.d.

**Permit Condition (Sept. 94): II.E.2.d. QA/QC - Content - Sample Analysis
Section**

Where applicable, a Sample Analysis section which shall specify the following:

- i. Chain-of-custody procedures, including:
 - (1) Certification that all samples obtained for analysis will be delivered to a responsible person at the recipient laboratory who is authorized to sign for incoming field samples, obtain documents of shipment, and verify the data entered onto the sample custody records;
 - (2) Provision for a laboratory sample custody log; and,
 - (3) Specification of chain-of-custody procedures for sample handling, storage, and dispersement for analysis.
- ii. Sample storage procedure descriptions and storage times;
- iii. Sample preparation methods;
- iv. Descriptions of analytical procedures, including:
 - (1) Scope and application of the procedure;
 - (2) Sample matrix;
 - (3) Potential interferences;
 - (4) Precision and accuracy of the methodology; and,
 - (5) Method detection limits.
- v. Descriptions of calibration procedures and frequency;
- vi. Data reduction, validation, and reporting;
- vii. Internal laboratory quality control checks, laboratory performance, and systems audits and frequency, including:
 - (1) Method blank(s);
 - (2) Laboratory control sample(s);
 - (3) Calibration check sample(s);
 - (4) Replicate sample(s);
 - (5) Matrix-spiked sample(s);
 - (6) "Blind" quality control;
 - (7) Control charts;
 - (8) Surrogate samples;
 - (9) Zero and span gases; and,
 - (10) Reagent quality control checks.

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Each QA/QC Plan for sampling will have a sampling analysis section that addresses RCRA Permit Condition II.E.2.d. requirements.

II.E.2.d.

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II.E.3.

Permit Condition (Sept. 94): II.E.3. QA/QC - Content - Data Management Plan

Each QA/QC plan shall include a Data Management Plan or equivalent, to document and track data and results. This plan shall identify and establish data documentation materials and procedures, project or unit file requirements, and project-related progress reporting procedures and documents. The storage location for the raw data shall be identified. The plan shall also provide the format to be used to record and, for projects, present the validated and unvalidated data and conclusions. The Data Management Plan shall include the following as applicable:

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: A data management plan, as defined by RCRA Permit Condition II.E.3. will be part of each QA/QC plan.

II.E.3.

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II.E.3.a.

Permit Condition (Sept. 94): II.E.3.a. QA/QC - Content - Data Recording

A data record including the following:

- i. Unique sample or field measurement code;
- ii. Sampling or field measurement location including surveyed horizontal coordinates and elevation of the sample location, and sample or measurement type;
- iii. Sampling or field measurement raw data;
- iv. Laboratory analysis ID number;
- v. Result of analysis (e.g., concentration);
- vi. Elevations of reference points for all ground water level measurements, including water level elevation, top of casing elevation, and ground surface elevation; and,
- vii. Magnetic computer records of all ground water, soil, surface water, and sediment analytical data.

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: A data recording section as defined by RCRA Permit Condition II.E.3.a., will be part of each QA/QC plan.

II.E.3.a.

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II.E.3.b.

Permit Condition (Sept. 94): II.E.3.b. QA/QC - Content - A Data Tabular Display

Tabular displays, as appropriate, illustrating:

- i. Unsorted validated and unvalidated data;
- ii. Results for each medium and each constituent monitored;
- iii. Data reduction for statistical analysis;
- iv. Sorting of data by potential stratification factors (e.g., location, soil layer, topography); and,
- v. Summary data.

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: A data tabular display, as defined by RCRA Permit Condition II.E.3.b., will be part of each QA/QC plan.

II.E.3.b.

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II.E.3.c.

Permit Condition (Sept. 94): II.E.3.c. QA/QC - Content - Graphic Data Display

Graphical displays (e.g., bar graphs, line graphs, area or plan maps, isopleth plots, cross-sectional plots or transects, three dimensional graphs, etc.), as appropriate, presenting the following:

- i. Displays of sampling location and sampling grid;
- ii. Identification of boundaries of sampling area and areas where more data are required;
- iii. Displays of concentrations of contamination at each sampling location;
- iv. Displays of geographical extent of contamination;
- v. Areal and vertical displays of contamination concentrations, concentration averages, and concentration maxima, including isoconcentration maps for contaminants found in environmental media at the Facility;
- vi. Illustrations of changes in concentration in relation to distance from the source, time, depth, or other parameters;
- vii. Identification of features affecting intramedia transport and identification of potential receptors;
- viii. For each round of ground water level measurements, maps showing the distribution of head measurements in each aquifer; and,
- ix. For each well, provide a hydrograph that shows the distribution of water level measurements taken during the time interval of the investigation.

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: A graphics data display, as defined by RCRA Permit Condition II.E.3.c., will be part of each QA/QC plan.

II.E.3.c.

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II.E.4.

Permit Condition (Sept. 94): II.E.4. QA/QC - Content - Data Availability Notifications

Unless otherwise agreed upon in writing by the Department, the Permittees shall provide notification of availability to the Department of all data obtained pursuant to this Permit within 30 days of receipt by the Permittees, or after completion of QA/QC activities, if applicable. If the Department agrees that data will be obtained on a routine basis for a particular unit, the Permittees shall only be required to provide notification of data availability within 30 days of first availability along with a statement as to expected frequency of future data. If routine data is not acquired at the stated expected frequency, the Permittees shall notify the department within 30 days with an explanation and revision, if applicable. This notification requirement shall also apply to any other information obtained from activities conducted, or data obtained, that may influence activities pursuant to this Permit.

Responsiveness Summary: The Department believes that as the data is obtained for purposes of complying with the Permit, the Department should be notified of its receipt so it may be reviewed for compliance with the Permit and as a basis for making decisions. Since the Permit does not specify the means of notification, a simple phone call or brief statement at a monthly unit managers meeting would suffice. The Department does not believe that such "notification" requires a great expenditure of tax payer dollars.

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: For each incorporated TSD unit, the Permittees will provide Ecology with 'notification' of the availability of all data obtained pursuant to the conditions of this RCRA Permit. The first notification will be within 30 days of the Permittees' receipt of such data and may include a schedule of the expected frequency of data receipt. Within 30 days, the Permittees will revise and explain any data receipt delays.

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II.E.5.

Permit Condition (Sept. 94): II.E.5. QA/QC - Content - Data Quality Objectives

The level of QA/QC for the collection, preservation, transportation, and analysis of each sample which is required for implementation of this Permit may be based upon Department approved data quality objectives for the sample. These data quality objectives shall be approved by the Department, in writing, or through incorporation of unit plans and permits into Parts III or V of this Permit.

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Data quality objectives for sampling will be approved by Ecology in writing, or through incorporation of TSD unit plans into the RCRA Permit.

II.E.5.

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II.F.

Permit Condition (Sept. 94): II.F. GROUNDWATER AND VADOSE ZONE MONITORING

The Permittees shall comply with the groundwater monitoring requirements of WAC 173-303-645. This Condition shall apply only to those wells the Permittees use for the groundwater monitoring programs applicable to the TSD units incorporated into Parts III or V of this Permit. Where releases from TSD units subject to this Permit have been documented or confirmed by investigation, or where vadose zone monitoring is proposed for integration with groundwater monitoring, the Permittees shall evaluate the applicability of vadose zone monitoring. The Permittees shall consult with the Department regarding the implementation of these requirements. If agreed to by the Department, integration of groundwater and vadose zone monitoring for reasons other than this Permit may be accommodated by this Permit. Results from other investigation activities shall be used whenever possible to supplement and/or replace sampling required by this Permit.

Responsiveness Summary: WAC 173-303-800(8) specifies that each permit issued shall contain terms and conditions as the Department determines necessary to protect human health and the environment. WAC 173-303-283(2) identifies degradation of groundwater quality as justification for the application of more stringent facility standards than those spelled out in WAC 173-303-280, 173-303-290 through -400 and 173-303-600 through -670. WAC 173-303-645 specifies the groundwater monitoring requirements for applicable permitted TSD units. WAC 173-303-400 (by reference of 40 CFR 265.90) specifies the groundwater monitoring requirements for applicable interim status TSD units.

The Department is requiring the integrity evaluations and subsequent abandonment or remediation of wells because of the likelihood that monitoring wells can act as preferential pathways for the migration of contaminants either between the upper and lower aquifers, or between the upper and lower portions of the same aquifer.

The Department considers these wells which allow contamination to be communicated throughout and between aquifers a potential threat to human health and the environment which must be dealt with in a timely manner. Therefore, the requirement to perform integrity evaluations and subsequent abandonment or remediation of wells as specified by Conditions II.F.2.a. and b. has not been deleted.

The Department is requiring an integrity evaluation of those wells subject to this Permit and will pursue enforcement action outside of this Permit to assess and remediate and/or abandon (to Chapter 173-160 WAC standards), where applicable, those wells not being addressed by this Permit.

The Department is requiring an integrity evaluation of those wells subject to this Permit and will pursue enforcement action outside of this Permit to assess and remediate and/or abandon (to Chapter 173-160 WAC standards), where applicable, those wells not being addressed by this Permit.

While the Department recognizes that the majority of groundwater remediation will be addressed through the CERCLA and RCRA past practice mechanisms of the

II.F.

FFACO, the regulatory requirements for groundwater monitoring applicable to TSD units cannot be waived.

Workshop Synopsis (Oct. 94): Condition II.F., Groundwater and Vadose Zone Monitoring. It's important to see here that it's only applicable to the units that are in the permit. It's not applicable to interim status units, and not applicable to the thousands of wells out at the site. At this time, of the five units in the permit, only one is required to have groundwater monitoring. That's the 183-H Basins, so they need to meet the requirements in here and they're the only ones.

But there's some things the Permittees should know if your unit will eventually be in here. One is that Ecology gives some allowance for RCRA/CERCLA integration, naturally integration with any other law or requirement. That's if you're doing sampling under some other law, if the data meet the objectives of what we need under RCRA, if the Dangerous Waste Regs will allow you to use this data, or if you've installed a well for some other purpose, we can allow you to use that same well for the purpose of complying with RCRA.

This condition also requires that you follow the purgewater management plan. That's one of the attachments to the permit.

Question: Is that the same as the groundwater, purgewater agreement that's Appendix F to the Tri-Party Agreement? Is that the same thing that you're applying here?

Answer: Yes.

Then which document is it? Is it part of the permit or part of Appendix F of the TPA?

It's an attachment of both.

But you said it applies to only one unit.

For purposes of enforcing the permit, it only applies to one unit.

Anywhere else, where you're required to apply that through the TPA, you still need to continue doing that. All we're talking about today is enforcing the permit, and the only place we can enforce the use of the purgewater document is at the 183-H Basins. Now through the TPA, I understand what you're saying, it still has to be used at other places on the site.

There's also a schedule for inspecting wells, for remediating wells, for abandoning wells. That has to be developed. Also the condition specifies construction standards for wells that are used to comply with the permit.

Question: Does that only apply to 183-H? For like construction standards? For construction standards and what you're calling your standards for --
What this references is state regulations on well construction, well remediation.

Answer: I understand that, but it only applies to the one unit.
We can only enforce it at 183-H through the unit. We can enforce it at other places on the facility through other mechanisms but not through the permit.

Inspection Guidance:

Permittee (ID) Guidance:

II.F.

Requirement Summary: Comply with the groundwater monitoring requirements of WAC 173-303-645 for wells used for TSD groundwater monitoring programs.

Concerns or Comment: Incorporation of the *1986 Compliance and Consent Order* is needed.

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II.F.1.

Permit Condition (Sept. 94): II.F.1. Purgewater Management

Purgewater shall be handled in accordance with the requirements set forth in Attachment 5, *Purgewater Management Plan*.

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Purgewater will be handled in accordance with the Purgewater Management Plan (Attachment 5).

II.F.1.

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II.F.2.a.

Permit Condition (Sept. 94): II.F.2.a. Well Remediation and Abandonment Well Inspections

The Permittees shall inspect the integrity of active resource protection wells as defined by WAC 173-160-030 subject to this Permit at least once every five (5) years. These inspections shall be recorded in the Operating Record. The Permittees shall prepare a plan and schedule within 120 days after the effective date of this Permit, specifying the schedule and technical standards for this program. The Permittees shall provide a copy of this plan upon the request of the Department.

Responsiveness Summary: II.F.

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: By January 26, 1995, place in the Facility Operating Record, a copy of the plan that specifies the technical standards and schedule to inspect at least once every 5 years, the integrity of the active resource protection wells subject to the RCRA Permit.

II.F.2.a.

This page intentionally left blank.

II.F.2.b.

Permit Condition (Sept. 94): II.F.2.b. Well Decommissioning Plan

The Permittees shall evaluate resource protection wells subject to this Permit according to Sections 4.1. through 4.8.3. of the *Hanford Well Remediation and Decommissioning Plan* (Attachment 6) and the Policy on Remediation of Existing Wells and Acceptance Criteria for RCRA and CERCLA, June 1990 (Attachment 7) to determine if a well has a potential use as a qualified well. The Permittees shall abandon or remediate unusable wells according to the requirements of Chapter 18.104 RCW, Chapter 173-160 WAC, and Chapter 173-162 WAC to ensure that the integrity of wells subject to this Permit is maintained. The timeframe for this remediation will be specified in Parts III or V of this Permit.

Responsiveness Summary: II.F.

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Evaluate resource protection wells per the Hanford Well Remediation and Decommissioning Plan and the Policy on Remediation of Existing Wells and Acceptance Criteria for RCRA and CERCLA to determine if a well has a potential use as a qualified well.

II.F.2.b.

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II.F.2.c.

Permit Condition (Sept. 94): II.F.2.c. Well Remediation Notifications

The Department shall receive notice in writing at least 72 hours before the Permittees remediate (excluding maintenance activities) or abandon any well subject to this Permit.

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Notify Ecology in writing at least 72 hours before remediating or abandoning any well subject to the RCRA Permit (excluding maintenance activities).

II.F.2.c.

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II.F.2.d.

Permit Condition (Sept. 94): II.F.2.d. Well Remediation Schedule

For wells subject to this Permit, the Permittees shall achieve full compliance with Chapter 173-160 WAC and Chapter 18.104 RCW consistent with a rolling five (5) year schedule agreed to by the Department and the Permittees. This process shall be completed by the year 2012.

Responsiveness Summary: WAC 173-303-800(8) specifies that each permit issued shall contain terms and conditions as the Department determines necessary to protect human health and the environment. WAC 173-303-283(2) identifies degradation of groundwater quality as justification for the application of more stringent facility standards than those spelled out in WAC 173-303-280, 173-303-290 through -400 and 173-303-600 through -670.

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Achieve full compliance with WAC 173-160 and Chapter 18.104 RCW consistent with a rolling 5-year schedule.

II.F.2.d.

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II.F.3.

Permit Condition (Sept. 94): II.F.3. Well Construction

All wells constructed pursuant to this Permit shall be constructed in compliance with Chapter 173-160 WAC.

Responsiveness Summary: WAC 173-303-800(8) specifies that each permit issued shall contain terms and conditions as the Department determines necessary to protect human health and the environment. WAC 173-303-283(2) identifies degradation of groundwater quality as justification for the application of more stringent facility standards than those spelled out in WAC 173-303-280, 173-303-290 through -400 and 173-303-600 through -670.

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: All wells required by the RCRA Permit will be constructed in compliance with Chapter 173-160 WAC.

II.F.3.

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II.G.

Permit Condition (Sept. 94): II.G. SITING CRITERIA

The Permittees shall comply with the applicable notice of intent and siting criteria of WAC 173-303-281 and WAC 173-303-282, respectively.

Responsiveness Summary:

Workshop Synopsis (Oct. 94): Condition II.G. is Siting Criteria. If you're out in the interstitial area, and you decide you want to build a TSD, you have to comply with the siting criteria.

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Notices of intent and siting criteria for dangerous waste TSD units will be in accordance with WAC 173-303-281 and WAC 173-303-282, respectively.

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II.H.

Permit Condition (Sept. 94): II.H. RECORDKEEPING AND REPORTING

In addition to the recordkeeping and reporting requirements specified elsewhere in this Permit, the Permittees shall comply with the following:

Responsiveness Summary: The Department has previously stated that the federal government is exempt from the financial assurance and liability provisions of WAC 173-303-620. As the Commenter points out, the Department also has previously stated that the requirements of WAC 173-303-620 do apply to federal government contractors. After further consideration of this issue, the Department has concluded that the requirements of WAC 173-303-620 were not intended to apply to contractors to a state or federal government in situations such as that at Hanford. (See the Department's letter to the Permittees dated June 30, 1994).

Workshop Synopsis (Oct. 94): Let's take an action for WHC, DOE-RL, and BHI to get together with Ecology and find out what Ecology's expectations are for each and every one of those units. DOE-RL will be our lead. Let's find out what those records need to be and understand where they will be kept.

In the RCRA Permit Handbook it's broken down condition by condition, and where we reach an agreement on a condition, we slide a piece of paper in there saying this is what we decided and this is a case we could use this, this is the interpretation for operating the record for the closures that are already in the permit. But I don't want to go through a permit modification to establish a list.

We want to avoid permit modification. Once you get a unit in there we want to try to work with you. That's why we added Condition II.K. that says if you're making minor changes out at the unit that you're closing and it doesn't affect the overall closure strategy then just document that in your operating record and carry on. Now if you're going to change from a clean closure to a landfill closure then you'll yeah, you'll probably have to do a permit modification.

The Permittees should write a letter telling Ecology exactly where those records are kept. If we've got something that's a tube on a post with the document we should tell them exactly where the location is.

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: The Permittees shall follow the recordkeeping and reporting requirements of Permit Condition II.H.

II.H.

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II.H.1.

Permit Condition (Sept. 94): II.H.1. Record Keeping and Reporting - Cost Estimate for Facility Closure

The Permittees shall submit an annual report updating projections of anticipated costs for closure and postclosure of TSD units incorporated into Parts III or V of this Permit. This report will be submitted annually, by October 31, to the Department and reflect cost updates as of September 30, of the past Fiscal Year.

Responsiveness Summary:

Workshop Synopsis: PSC (October 1995)

Conditions II.H.1. and II.H.2. of the Hanford Facility RCRA Permit, Dangerous Waste Portion (RCRA Permit) require an annual report updating projections of anticipated costs for closure and postclosure of treatment, storage, and/or disposal (TSD) units incorporated in Parts III or V. The following information has been discussed between members of DOE-RL staff and Mr. Jaraysi of Ecology-Kennewick for making the 1995 cost estimates.

1. To include very brief (one line) estimated costs for Part V TSD units 218-E-8 Borrow Pit, 200 Area Ash Pit, 2101-M Pond, Hanford Patrol Academy Demolition Site, and 304 Concretion Facility, for which only administrative tasks remain.
2. To only include an inflation factor for Part III TSD units 616 Nonradioactive Dangerous Waste Storage Facility and 305-B Storage Facility for which complete estimates were provided in the October 31, 1994 report. Complete updated estimates for these units would be included in future annual reports if the closure strategy/approach should significantly change or a closure date is identified.
3. To include updated cost projections for Part V TSD units 183-H Solar Evaporator Basins and 105-DR Large Sodium Fire Facility, for which closure activities are ongoing.
4. To not include Part V TSD units 300 Area Solvent Evaporator, 2727-S Nonradioactive Dangerous Waste Storage Facility, Simulated High Level Waste Slurry, and 216-B-3 Expansion Ponds, as these units have been accepted as clean closed by the Washington State Department of Ecology.

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: On October 31 of each year, submit an annual report updating projections of anticipated costs for closure and postclosure of TSD units incorporated into this Permit.

II.H.1.

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II.H.2.

Permit Condition (Sept. 94): II.H.2. Record Keeping and Reporting - Cost Estimate for Postclosure Monitoring and Maintenance

The Permittees shall submit an annual report updating projects of anticipated costs for postclosure monitoring and maintenance for TSD units incorporated into Parts III or V of this Permit. This report will be submitted annually, by October 31, to the Department and reflect cost updates as of September 30, of the past Fiscal Year.

Responsiveness Summary:

Workshop Synopsis: Refer to II.H.1., PSC (October 1995)

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: On October 31 of each year, submit annual report updating anticipated costs for postclosure monitoring and maintenance of TSD units incorporated into the RCRA Permit.

II.H.2.

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II.H.3.

Permit Condition (Sept. 94): II.H.3. Closure/Post Closure Financial Assurance

The Permittees are exempt from the requirements of WAC 173-303-620

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: The Permittees are exempt from the requirements of WAC 173-303-620.

II.H.3.

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II.I.1.

Permit Condition (Sept. 94): II.I. FACILITY OPERATING RECORD
II.I.1. Records Identification and Retention

The Permittees shall maintain a written Facility Operating Record until ten (10) years after postclosure or corrective action is complete and certified for the Facility, whichever is later. Except as specifically provided otherwise in this Permit, the Permittees shall also record all information referenced in this Permit in the Facility Operating Record within seven (7) working days after the information becomes available. A TSD unit-specific operating record shall be maintained for each TSD unit at a location identified in Parts III and V of this Permit. Each TSD unit-specific operating record shall be included by reference in the Facility Operating Record. Information required in each TSD unit-specific operating record is identified on a unit-by-unit basis in Part III or V of this Permit. The Facility Operating Record shall include, but not be limited to, the following information:

Responsiveness Summary: WAC 173-303-380 requires the facility owner or operator to keep a written operating record at the facility. WAC 173-303-800(8) specifies that each permit issued shall contain terms and conditions as the Department determines necessary to protect human health and the environment. WAC 173-303-390 states that the owner or operator shall submit any other reports required by the Department.

Workshop Synopsis (Oct. 94):

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Record all information required by the RCRA Permit into the Facility Operating Record within 7 working days after the information becomes available and maintain the record until 10 years after postclosure or corrective action is complete and certified, whichever is later.

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II.I.1.a.

Permit Condition (Sept. 94): II.I.1.a. Facility Operating Record - SWMU's Data Management System

A description of the system(s) currently utilized to identify and map solid waste management units and their locations. The description of the system(s) is required to include an identification of on-site access to the system's data, and an on-site contact name and telephone number. In addition to, or as part of, this system(s), the Permittees shall also maintain a list identifying active 90-day waste storage areas and dangerous waste satellite accumulation areas and their locations. The list shall identify the location, the predominant waste types managed at the area, and a date identifying when the list was compiled. Maps shall be provided by the Permittees upon request by the Department;

Responsiveness Summary: WAC 173-303-806(4)(a)(xviii), WAC 173-303-806(4)(a)(xx)(C), WAC 173-303-806(4)(xxiv), and WAC 173-303-806(4)(xxiii)(I) specify mapping requirements. WAC 173-303-380(1)(b) requires the operating record to include information regarding "[T]he location of each dangerous waste within the facility and the quantity at each location." WAC 173-303-390 states that the owner or operator shall submit any other reports required by the Department. Lastly, WAC 173-303-800(8) specifies that each permit issued shall contain terms and conditions as the Department determines necessary to protect human health and the environment.

The Department recognizes the current system of identifying SWMUs (by identification and location within the "Hanford Solid Waste Management Unit Report" DOE/RL 88-30 and subsequently identified topographically within the Waste Information Data System) upon modification to include an identification of all SWMUs as sufficient for information use number 1 identified above. The Department also recognizes the identification of 90-day waste storage areas and dangerous waste satellite accumulation areas as provided and periodically updated by WHC's RCRA Compliance Support Unit. The Condition has been rewritten to acknowledge the different types of information and to clarify the type of information required. The Department recognizes that certain maps requested by the Department may not be reproduced instantaneously and will allow a reasonable amount of time for responding to requests.

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Within the Facility Operating Record, the Permittees will identify the system(s) by which SWMUs are identified, quantified, mapped, and compiled.

II.I.1.a.

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II.I.1.b.

Permit Condition (Sept. 94): II.I.1.b. Waste Analysis Records

Records and results of waste analyses required by WAC 173-303-300;

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Within the Facility Operating Record, the Permittees will maintain records and results of waste analyses required by WAC 173-303-300.

II.I.1.b.

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II.I.1.c.

Permit Condition (Sept. 94): II.I.1.c. Occurrence Reports System

An identification of the system(s) currently utilized to generate Occurrence Reports. The identification of the system(s) is required to include a description, an identification of an on-site location of hard-copy Occurrence Reports, an identification of on-site access to the system's data, and an on-site contact name and telephone number;

Responsiveness Summary: WAC 173-303-380 requires the facility owner or operator to keep a written operating record at the facility. WAC 173-303-800(8) specifies that each permit issued shall contain terms and conditions as the Department determines necessary to protect human health and the environment.

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Within the Facility Operating Record, the Permittees will identify the system(s) used to compile occurrence reports.

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II.I.1.d.

Permit Condition (Sept. 94): II.I.1.d. Copies of Unmanifested Waste Reports

Copies of all unmanifested waste reports;

Responsiveness Summary: WAC 173-303-370 requires the facility owner or operator to retain at the facility a copy of each manifest for at least three years from the date of delivery. WAC 173-303-390 states that the owner or operator shall submit any other reports required by the Department. WAC 173-303-380 requires the facility owner or operator to keep a written operating record at his facility. WAC 173-303-800(8) specifies that each permit issued shall contain terms and conditions as the Department determines necessary to protect human health and the environment.

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Within the Facility Operating Record, the Permittees will maintain copies of all unmanifested waste reports.

II.I.1.d.

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II.I.1.e.

Permit Condition (Sept. 94): II.I.1.e. Contingency Plan Data Management System

Hanford Facility Contingency Plan as well as summary reports and details of all incidents that require implementing the Contingency Plan, as specified in WAC 173-303-360(2)(k);

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Within the Facility Operating Record, the Permittees will maintain copies of the Hanford Facility contingency plan and summary reports of all instances that required its implementation.

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II.I.1.f.

Permit Condition (Sept. 94): II.I.1.f. Training Records Management System

An identification of the system(s) currently utilized and being developed to record personnel training records and to develop training plans. The identification of the system(s) is required to include a description, an identification of on-site access to the system's data, and an on-site contact name and telephone number;

Responsiveness Summary: WAC 173-303-380 requires the facility owner or operator to keep a written operating record at the facility. WAC 173-303-330(2) and (3) require the facility owner or operator to keep a written training plan and training records, respectively. WAC 173-303-800(8) specifies that each permit issued shall contain terms and conditions as the Department determines necessary to protect human health and the environment. WAC 173-303-390 states that the owner or operator shall submit any other reports required by the Department.

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Within the Facility Operating Record, the Permittees will maintain copies of the training plan(s), training records database, and contract personnel information.

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II.I.1.g.

**Permit Condition (Sept. 94): II.I.1.g. Preparedness and Prevention - Offsite
Integration Reports**

Preparedness and prevention arrangements made pursuant to WAC 173-303-340(4) and documentation of refusal by state or local authorities that have declined to enter into agreements in accordance with WAC 173-303-340(5);

Responsiveness Summary: WAC 173-303-380 requires the facility owner or operator to keep a written operating record at the facility. WAC 173-303-800(8) specifies that each permit issued shall contain terms and conditions as the Department determines necessary to protect human health and the environment. WAC 173-303-340(5) requires an identification of refusal by state or local authorities to enter into preparedness and prevention arrangements.

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Within the Facility Operating Record, the Permittees will maintain copies of preparedness and prevention agreements with state and local authorities; including, as appropriate, refusal documentation.

II.I.1.g.

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II.I.1.h.

Permit Condition (Sept. 94): II.I.1.h. [Reserved]

[Reserved]

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: [Reserved]

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II.I.1.i.

**Permit Condition (Sept. 94): II.I.1.i. Closure and Postclosure Cost Estimate
Records**

An identification and description of the report containing closure and postclosure cost estimates required by Conditions II.H.1. and II.H.2. The identification shall provide the on-site location and document number of the report;

Responsiveness Summary: WAC 173-303-800(8) specifies that each permit issued shall contain terms and conditions as the Department determines necessary to protect human health and the environment. WAC 173-303-390 states that the owner or operator shall submit any other reports required by the Department.

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Within the Hanford Facility Operating Record, the Permittees will maintain copies of the annual closure and postclosure cost estimate reports.

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II.I.1.j.

Permit Condition (Sept. 94): II.I.1.j. Waste Transportation Records

Documentation (e.g. waste profile sheets) of all dangerous waste transported to or from any TSD unit subject to this Permit. This documentation shall be maintained in the receiving unit's operating record from the time the waste is received;

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Within the Facility Operating Record, the Permittees will maintain copies of waste transportation documentation to and from the TSD units incorporated into the Permit and the receiving unit's operating record will maintain the documentation.

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II.I.1.k.

Permit Condition (Sept. 94): II.I.1.k. Waste Location System

An identification of the system(s) currently utilized to cross-reference waste locations to specific manifest document numbers. The identification of the system(s) is required to include a thorough description, an identification of an on-site location of a hard-copy data report, an identification of on-site access to the system's data, and an on-site contact name and telephone number;

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Within the Facility Operating Record, the Permittees will maintain copies of the system(s) to cross-reference and map waste locations to specific waste manifest (transportation) documentation.

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II.I.1.I.

Permit Condition (Sept. 94): II.I.1.I. [Reserved]

[Reserved]

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: [Reserved]

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II.I.1.m.

Permit Condition (Sept. 94): II.I.1.m. Annual Reports

Annual Reports required by this Permit;

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Within the Facility Operating Record, the Permittees will maintain copies of the annual reports.

II.I.1.m.

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II.I.1.n.

Permit Condition (Sept. 94): II.I.1.n. Monitoring Information Management System

An identification of all systems currently utilized to record monitoring information, including all calibration and maintenance records, and all original strip chart recordings for continuous monitoring instrumentation. The identification of systems shall include a description of the systems. The descriptions shall include a confirmation that the criteria of Condition I.E.10.e. is provided by the utilization of the system. The identification of the systems shall also include an identification of on-site access to the system's data, an on-site contact name and telephone number;

Responsiveness Summary: WAC 173-303-380 requires the facility owner or operator to keep a written operating record at the facility. WAC 173-303-380(1)(e) specifically requires "[M]onitoring, testing, or analytical data, and corrective action where required by WAC 173-303-630 through 173-303-680 for final status facilities." WAC 173-303-800(8) specifies that each permit issued shall contain terms and conditions as the Department determines necessary to protect human health and the environment. WAC 173-303-810(11) requires all permits to contain general permit conditions regarding monitoring recordkeeping requirements.

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Within the Facility Operating Record, the Permittees will maintain copies of the system(s) to capture and retain monitoring information (data).

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II.I.1.o.

Permit Condition (Sept. 94): II.I.1.o. [Reserved]

[Reserved]

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: [Reserved]

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II.I.1.p.

Permit Condition (Sept. 94): II.I.1.p. Groundwater Corrective Action Reports

Summaries of all records of groundwater corrective action required by WAC 173-303-645;

Responsiveness Summary: WAC 173-303-645 requires the generation of reports regarding RCRA TSD unit groundwater corrective action proposals and activities. WAC 173-303-646 specifies corrective action provisions for releases of dangerous wastes and dangerous constituents from SWMUs. WAC 173-303-380 requires the facility owner or operator to keep a written operating record at the facility. WAC 173-303-800(8) specifies that each permit issued shall contain terms and conditions as the Department determines necessary to protect human health and the environment. WAC 173-303-390 states that the owner or operator shall submit any other reports required by the Department.

The Department acknowledges a lack of clarity in distinction between the groundwater corrective action requirements of WAC 173-303-645 and the corrective action requirements of WAC 173-303-646. Therefore, the Condition has been rewritten to specify groundwater corrective action summaries.

As corrective action for solid waste management units may be permitted (WAC 173-303-646) through Part IV or V of this Permit after the Department receives HSWA authorization, the Department acknowledges the various summary reports required by the FFACO to be sufficient for this time.

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Within the Facility Operating Record, the Permittees will maintain copies of all groundwater corrective action reports required by WAC 173-303-645.

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II.I.1.q.

Permit Condition (Sept. 94): II.I.1.q. Hanford Facility Permit Compliance Management System

An identification of the system(s) currently being utilized and being developed to evaluate compliance with the Conditions of this Permit and with Chapter 173-303 WAC. The identification of the system(s) shall include a description of the system(s), an identification of on-site access to the system's data, and an on-site contact name and telephone number. The description of the system(s) shall also include a definition of which portion(s) of the system(s) are accessible to the Department;

Responsiveness Summary: WAC 173-303-380 requires the facility owner or operator to keep a written operating record at the facility. WAC 173-303-800(8) specifies that each permit issued shall contain terms and conditions as the Department determines necessary to protect human health and the environment.

It should be noted, as with other Facility Operating Record conditions, the Department acknowledges the potential for redundancy to occur. The Department also recognizes that a data system (Commitment Tracking System (CTS)) is currently being developed to track compliance with the Conditions of this Permit as well as with the Washington Administrative Code. It is the Department's understanding that the CTS system will include a status, an implementation schedule (including a description of the implementation process), an identification of deliverable dates related to commitments, commitment documentation capabilities, etc. It is also the Department's understanding that the system will allow commitment related interpretations to be entered into a comment field by authorized users. It is also the Department's understanding that the Standards/Requirements Identification Document (S/RID) system is currently in use which also tracks compliance and that this system will be linked with the CTS system. Therefore, the Condition has been rewritten to require an identification and location of the compliance information, when available and the definition of the Department's accessibility.

Workshop Synopsis (Oct. 94): One of the things that DOE-RL is actively discussing with DOE management and with Ecology is the fact that to make the CTS system or any voluntary compliance identification system work. All of the Ecology people we've talked to so far have been very supportive of having that kind of system, as well as having that kind of approach to handling the information that gets into the system.

So I think that the concern that you've expressed is one that we've already begun talking with Ecology about so that we don't get dinged every time we identify some noncompliance.

One thing I (WHC) worry about with systems like that is, yes, you'll put a list together and you'll share it with Ecology and they'll be happy you've taken care of things and they won't ding you on those items, but that list may come back to haunt you. And the thing is, say you do get a noncompliance item, you get into dispute resolution or some means, you're appealing and then somebody pops up and says well, you have to realize this is just indicative of the way they operate out here; we've got a list that says there were 875 occurrences of things that happened over the last year. These people don't comply with the law. So now that list of things that they didn't ding us on, is now used to characterize us in our compliance.

You're exactly right. That's exactly what could happen, but if we have 875 violations, collectively, we probably ought to get dinged. Let's face it folks, we're trying to operate in a compliant fashion, we're not trying to operate in a noncompliant fashion. And everyone needs to understand that

II.I.1.g.

across the entire Hanford Facility taking shortcuts with the regulations is not going to be tolerated, be they minor shortcuts or major shortcuts. If you have problems with the regulations and you have questions with compliance, then you should raise those questions and get them identified and get them dealt with. Don't just let them hang out there and become closet violations or whatever. And then we won't get the 875 little items that become big item collections.

When I (WHC) look at our training plan for tank farms, for example, I've got probably 800 people on that plan average four classes each, which gives me well over 2,000 perhaps 3,000 possibilities for non-compliance. And so if I have one person that's one day late on taking the HGET and you multiply that across the site, I don't care if it's 875, when you've got 17,000 people and you do the numbers you're going to end up with a million training violations and 875 might not be bad. You know 875 sounds like a big number, but when you start multiplying all the requirements, it really could be okay.

It could be, and we took down the slide and we had reasonableness.

That's all I'm saying, it's got to be reasonable.

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Within the Facility Operating Record, the Permittees will maintain copies of the system(s) used to determine compliance with the RCRA Permit conditions.

II.I.1.r.

Permit Condition (Sept. 94): II.I.1.r. Records of Deed Notifications

All deed notifications required by this Permit (to be included by reference);

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Within the Facility Operating Record, the Permittees will maintain copies of all Deed Notifications required by the RCRA Permit.

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II.I.1.s.

Permit Condition (Sept. 94): II.I.1.s. Final Status Unit Inspection Reports

All inspection reports required by this Permit; and,

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Within the Facility Operating Record, the Permittees will maintain copies of all inspection reports required by the RCRA Permit.

II.I.1.s.

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II.I.1.t.

Permit Condition (Sept. 94): II.I.1.t. Other Hanford Facility Permit Reports

All other reports as required by this Permit, including ECNs and NCRs.

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Within the Facility Operating Record, the Permittees will maintain copies of all other reports (including ECN's and NCRs) as required by the RCRA Permit.

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II.I.2.

Permit Condition (Sept. 94): II.I.2. Management Systems Reporting Deadline

The descriptions of systems and/or reports required in Conditions II.I.1.a., II.I.1.c., II.I.1.f., II.I.1.i., II.I.1.k., II.I.1.n., and II.I.1.q., shall be placed in the Facility Operating Record within twelve months of the effective date of this Permit.

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Within the Facility Operating Record, by October 28, 1995, the Permittees will prepare and maintain copies of the systems required by Permit Conditions II.I.1.a., II.I.1.c., II.I.1.f., II.I.1.i., II.I.1.k., II.I.1.n., and II.I.1.q.

II.1.2.

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II.J.1.

**Permit Condition (Sept. 94): II.J. FACILITY CLOSURE
II.J.1. Closure Certifications**

Final closure of the Hanford Facility will be achieved when closure activities for all TSD units have been completed, as specified in Parts III, IV, or V of this Permit. Completion of these activities shall be documented using either certifications of closure, in accordance with WAC 173-303-610(6), or certifications of completion of postclosure care, in accordance with WAC 173-303-610(11).

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: The Permittees will submit certifications of closure or postclosure care to document completion of activities for the individual chapters in Parts III, IV, and V of the RCRA Permit.

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II.J.2.

Permit Condition (Sept. 94): II.J.2. Part III and V Closure

The Permittees shall close all TSD units as specified in Parts III or V of this Permit.

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: The Permittees will close all TSD units as specified by the respective chapters in Parts III or V of the RCRA Permit.

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II.J.3.

Permit Condition (Sept. 94): II.J.3. Closure Notification and Modifications

The Permittees shall submit a written notification of or request for a permit modification in accordance with the provisions of WAC 173-303-610(3)(b) whenever there is a change in operating plans, facility design, or the approved closure plan. The written notification or request must include a copy of the amended closure plan for review or approval by the Department.

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Submit a written notification of or request for a permit modification per WAC 173-303-610(3)(b) whenever there is a change in operating plans, unit design, or approved closure plan.

II.J.3.

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II.J.4.

Permit Condition (Sept. 94): II.J.4. Closure Requirements

The Permittees shall close the Facility in a manner that:

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Closure will minimize the need for long-term maintenance and meet the requirements of WAC 173-303-610(2)(b).

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II.J.4.a.

Permit Condition (Sept. 94): II.J.4.a Closure Requirements

Minimizes the need for further maintenance.

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: The Permittees will close each TSD unit in a manner that minimizes the need for further maintenance.

II.J.4.a.

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II.J.4.b.

Permit Condition (Sept. 94): II.J.4.b. Closure Requirements

Controls, minimizes or eliminates to the extent necessary to protect human health and the environment, postclosure escape of dangerous waste, dangerous constituents, leachate, contaminated run-off, or dangerous waste decomposition products to the ground, surface water, ground water, or the atmosphere; and,

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: The Permittees will close each TSD unit in a manner that protects human health and the environment.

II.J.4.b.

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II.J.4.c.

Permit Condition (Sept. 94): II.J.4.c. Closure Requirements

Returns the land to the appearance and use of surrounding land areas to the degree possible given the nature of the previous dangerous waste activity.

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: The Permittees will close each TSD unit in a manner that returns the land to the appearance of the surrounding closed or unaffected land areas.

II.J.4.c.

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II.J.4.d.

Permit Condition (Sept. 94): II.J.4.d. Closure Requirements

Meets the requirements of WAC 173-303-610(2)(b).

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: The Permittees will close each TSD unit in a manner that meets the requirements of WAC-173-303-610(2)(b).

II.J.4.d.

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II.K.1.

Permit Condition (Sept. 94): II.K. SOIL/GROUNDWATER CLOSURE PERFORMANCE STANDARDS

II.K.1. Soil/Groundwater - "Clean Closure"

For purposes of Condition II.K., the term "clean closure" shall mean the status of a TSD unit at the Facility which has been closed to the cleanup levels prescribed by WAC 173-303-610(2)(b) provided certification of such closure has been accepted by Ecology.

Responsiveness Summary: [II.K.1.] The purpose of the last sentence of this Condition was written to establish the fact that although a TSD unit might be clean closed, that unit may not become available for unrestricted use because of non-TSD activities or contamination in the area.

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Closure will be to clean-up levels prescribed by WAC 173-303-610(2)(b) or to background levels if background levels exceed the former.

II.K.1.

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II.K.2.

Permit Condition (Sept. 94): II.K.2. Soil/Groundwater - Modified Closure

The Permittees may close a TSD unit to background levels as defined in Department approved Hanford Site Background Documents if background concentrations exceed the levels prescribed by Condition II.K.1. Closure to these levels, provided the Permittees comply with all other closure requirements for a TSD unit as identified in Parts III or V of this Permit, shall be deemed as "clean closure."

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: For clean closure, the Permittees will close each TSD to background levels or to concentrations below MTCA residential values.

II.K.2.

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II.K.3.

Permit Condition (Sept. 94): II.K.3. Soil/Groundwater - Modified Closure

Except for those TSD units identified in Conditions II.K.1., II.K.2., or II.K.4., the Permittees may close a TSD unit to a cleanup level specified under Method C of Chapter 173-340 WAC. Closure of a TSD unit to these levels, provided the Permittees comply with all other closure requirements for the TSD unit as specified in Parts III or V of the Permit, and provided the Permittees comply with Conditions II.K.3.a. through II.K.3.c., shall be deemed as a "modified closure."

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: A TSD may be closed to a cleanup level specified under Method C of WAC 173-340. Compliance with Conditions II.K.3.a through .c is required.

II.K.3.

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II.K.3.a.

Permit Condition (Sept. 94): II.K.3.a. Soil/Groundwater - Modified Closures

For "modified closures," the Permittees shall provide institutional controls in accordance with WAC 173-340-440 which restricts access to the TSD unit for a minimum of five (5) years following completion of closure. The specific details and duration of institutional controls shall be specified in Parts III or V of this Permit for a particular TSD unit.

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: For modified closure, the Permittees will document for at least 5 years, or as specified in Part III or V, that institutional controls in accordance with WAC 173-303-440 adequately protect human health and the environment.

II.K.3.a.

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II.K.3.b.

Permit Condition (Sept. 94): II.K.3.b. Soil/Groundwater - Modified Closures

For "modified closures", the Permittees shall provide periodic assessments of the TSD unit to determine the effectiveness of the closure. The specific details of the periodic assessments shall be specified in Parts III or V of this Permit. The periodic assessments shall include, as a minimum, a compliance monitoring plan in accordance with WAC 173-340-410 that will address the assessment requirements on a unit by unit basis. At least one (1) assessment activity shall take place after a period of five (5) years from the completion of closure, which will demonstrate whether the soils and groundwater have been maintained at or below the allowed concentrations as specified in Parts III or V of this Permit. Should the required assessment activities identify contamination above the allowable limits as specified in Parts III or V, the TSD unit must be further remediated or the requirements of II.K.4. must be followed. Should the required assessment activities demonstrate that contamination has diminished or remained the same, the Permittees may request that the Department reduce or eliminate the assessment activities and/or institutional controls.

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: For modified closure, the Permittees will provide periodic assessments for at least 5 years or as specified in Parts III or V, to determine the adequacy of the closure activities. Further, if contamination levels are exceeded, remediation activities may be required; and conversely, requests to Ecology for reduction in the number of assessments may be granted if prior assessments document no adverse impacts.

II.K.3.b.

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II.K.3.c.

Permit Condition (Sept. 94): II.K.3.c. Soil/Groundwater - Modified Closures

For "modified closures", the Permittees shall specify the specific activities required by this Condition in a postclosure permit application.

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: For modified closures, the Permittees will submit a postclosure (care) permit application.

II.K.3.c.

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II.K.4.

Permit Condition (Sept. 94): II.K.4. Soil/Groundwater - Landfill Closure

For any TSD unit which Conditions II.K.1., II.K.2., or II.K.3., are not chosen as the closure option, closing the TSD unit as a landfill may be selected. Closure and postclosure of the TSD unit as a landfill must follow the procedures and requirements specified in WAC 173-303-610.

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Closure and postclosure of the TSD unit as a landfill must follow the procedures and requirements specified in WAC 173-303-610.

II.K.4.

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II.K.5.

Permit Condition (Sept. 94): II.K.5. Soil/Groundwater - Future Land Usage

The cleanup option selected shall be specified in Parts III or V of this Permit and shall be chosen with consideration of the potential future site use for that TSD unit/area. Definitions contained within Chapter 173-340 WAC shall apply to Condition II.K. where definitions are not otherwise provided by this Permit, the FFACO, or Chapter 173-303 WAC.

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Closure cleanup option selected will be chosen with consideration of the potential future site use for that area.

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II.K.6.

Permit Condition (Sept. 94): II.K.6. Soil/Groundwater - Closure Progress Reports

Deviations from a TSD unit closure plan required by unforeseen circumstances encountered during closure activities which do not impact the overall closure strategy but provide equivalent results shall be documented in the TSD unit-specific operating record and made available to the Department upon request or during the course of an inspection.

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Document in the Facility Operating Records deviations from a TSD unit closure plan resulting from unforeseen circumstances that do not impact overall strategies.

II.K.6.

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II.K.7.

Permit Condition (Sept. 94): II.K.7. Soil/Groundwater - Other Cleanup Activity Integration

Where agreed to by the Department, integration of other statutorily or regulatory mandated cleanups may be accommodated by this Permit. Results from other cleanup investigation activities shall be used whenever possible to supplement and/or replace TSD unit closure investigation activities. All, or appropriate parts of, multipurpose cleanup and closure documents can be incorporated into this Permit through the Permit modification process. Cleanup and closures conducted under any statutory authority with oversight by either the Department or the Agency which meets the equivalent of the technical requirements of Conditions II.K.1. through II.K.4. may be considered as satisfying the requirements of this Permit.

Responsiveness Summary:

Workshop Synopsis: The final thing that this condition lays out is RCRA/CERCLA integration and actually RCRA law integration and it talks about using data from maybe a CERCLA operable unit where there's been some samples taken. Just allows you to take data, et cetera, from work done under some other law or regulation and use that to support your closure activities.

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: With Ecology's approval, closure activities at individual TSD units will integrate the statutory requirements from other regulations on adjacent/surrounding land areas and other cleanup investigation activities.

II.K.7.

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II.L.1.

Permit Condition (Sept. 94): II.L. DESIGN AND OPERATION OF THE FACILITY II.L.1. Proper Design and Construction

The Permittees shall design, construct, maintain, and operate the Facility to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous substances to air, soil, ground water, or surface water which could threaten human health or the environment.

Responsiveness Summary:

Workshop Synopsis: If you are constructing a facility or unit subject to the permit you need to use the engineering change notice, the ECN process, and the nonconformance report (NCR) system that's been established for construction projects. And that basically allows us, we've approved the design, your contractor out there needs to make changes, he can do that, but we need to be plugged into the ECN and NCR process.

Question: Wondering about what status we should send these NCRs to you. Recognized before there's been any resolution made, decide on a resolution then send them to you.

Answer: We have an inspection engineer on site. I guess he's the focal point of these reports.

Question: The question is at what point in an ECN or NCR process does Ecology need to be provided that data, and that's another written comment that's been presented to us already. What we found in the construction projects out there, like Moses mentioned, we do have an onsite construction engineer that typically, although it's not spelled out in the permit, works closely with the contractors and gets involved in the weekly meetings and ends up seeing copies of these ECNs and NCRs in more than enough time to make decisions and affect the outcome of them if we need to. But I agree that's not really spelled out very well in here about officially when we need to get copy.

Answer: We (Ecology) are writing up agreements between the facility management and our construction inspection engineers as to what are the critical systems within any facility that's being built on which the ECNs related to such systems would be seen and reviewed before they are finalized and implemented. The rest of the ECNs would be referred to us just for review purposes. And this is happening on most of the construction sites onsite.

Question: This condition says we're to provide copies 5 days after, 5 working days after initiating the ECN on critical systems.

Answer: Yes. The initiation of the ECN is when the decision -- not the decision, the engineering solution of the problem has been drafted and sent through the review cycle, that's when the ECN has been initiated.

Question: You want to see it (ECN) before it's been approved?

Answer: Yes, and not on all the systems, only the critical systems. Even if it hasn't been dispositioned, by letting us know within 5 days after initiating, then we have the opportunity to take part in the discussions and come to your meetings or call and find out what's going on because basically we wanted it as a heads-up and we understand it may not always be resolved by the time you notify us.

The permit suggests that you're going to use the NCRs to determine whether the permit modification is necessary. Without the disposition, I mean, if you don't know what we intend to do about this NCR how are we going to base your decision whether we need to modify the permit?

II.L.1.

The NCR may be different than the ECN.

The NCRs, we are not requesting to see them before they are approved. Talking about the ECNs to be seen before they are approved.

On the NCRs, it's 5 days after identification of the nonconformance. Won't be resolved that fast.

Right. So what could happen, you tell us instead of a 6-inch wall, ended up being a 4-inch wall but you haven't decided whether or not you're going to add the 2-inches or not, so how can we say whether or not it's okay or not.

Yeah, within 2 days.

That's when you (Permittees) want to get us (Ecology) involved so we say look, you got to have a 6-inch wall, tear out the 4-inch and put in the 6-inch. What we're just trying to do here is get involved early on the when the contractors are out there building the thing. We spent a lot of time trying to figure out this 5 days, 2 days, what's issuance, spent a lot of time working on that. But really the bottom line is we want to be involved. We have guys out there and we don't want you to make mistakes that we find unacceptable, and the way to do that is keep our construction inspector involved. This is a minimum requirement that you have to meet, but I think if a contractor is wise out there he's going to spend a lot of time with our compliance inspector and it won't be 5 days, it will be the next day, it will be the next time he sees our compliance inspector and pulls him into the inspection.

By the time an ECN or NCR is issued for resolution you've got yours. So you'll have something to make your judgment on.

That's right.

On an NCR if you're going to change the design it has to go back to the design engineer for disposition approval.

Usually it's the design engineer that's been involved so whatever the solution to your noncompliance

He may be in Seattle. I mean, if it's an offsite AE, he may not get to it within 5 days to approve it.

So by then the NCR wouldn't have been initiated.

Yes, it would.

Well, the solution to the NCR wouldn't have been initiated and that's what we're after, is the resolution of the problem that we have.

In other words, your inspector is going to be working them all the time. In reality this says we don't have to send it to you until after 5 days there's been a resolution.

By the time you issue your noncompliance reports, I mean, that's not when you first identify the problem.

Yes, it is.

That's after you, you've identified the problem and this is how we propose to fix it. That's when you issue the NCR.

When you've identified a problem and it's official nonconformance, doesn't have a resolution yet that's been identified and that's what they want within 5 days.

I think it's in our best interest to get Ecology on board early, because if we do a nonconformance report and decide we're going to accept whatever the nonconformance is and 3 weeks later we find out Ecology doesn't think that's satisfactory, Ecology can force us to go back and tear the whole damn thing out. If there were a system that was built Ecology didn't feel was going to meet the regulatory requirements, Ecology could force us to tear it apart and start over. It is in our interest to have Ecology in early and make sure that situation never comes up. And how we handle the paperwork, I think, if it takes 5 days or if we can do it in 2 days or whatever, if it takes longer than that, if we're working with them then we can get their agreement that it will take longer than that.

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Yeah, I think our projects probably going to have to make some adjustments to their system of doing things to accommodate some of the permit requirements.

I almost feel like we ought to go through our NCR process to meet this requirement, need to work with Ecology to make sure the working solution, I don't think what's in the permit right now will be a working solution.

That may very well be.

I think that's one thing we contemplated, and I think what you're saying is make Ecology a formal part of the NCR process? Is that what you're saying?

Yeah, we'll have to in accordance with this.

We wanted to do that, but that was viewed by a number of people as kind of getting in your shorts too far and that's why we came up with this language. And really I want to emphasize it would be in your best interest and our best interest to include the construction inspector, keep Ecology informed as early on in the process as we can.

We can't let Ecology get into the project management role, and I seriously question whether they really want to be in that role, because then they incur some liability that comes along with that would perhaps get in the way of them taking some action they might want to take later on. But it's certainly in our best interest to get them involved and let them know what's going on, make sure they understand what we're doing and that they have a basic agreement with it before we go ahead and implement some change in the projects.

Yeah. Depends on the decision whether we send an NCR or not, rework or going back to what was originally, I don't see a reason for them to even know about it.

If you do what?

If you're just redoing something.

If you decide to tear it out and replace it?

Yeah.

Yeah, well, then it won't be a nonconformance. We're more concerned about the ones that you're not going to fix, that you're going to get the engineers to sign off and say it's acceptable as is.

There's another element and that is nearly every construction project that is being built now or in the future is going to have some TPA milestone attached to it, and a lot of times these construction problems can directly impact our ability to meet a TPA milestones. So that's another reason for keeping Ecology in the loop as much as we can without really letting them get into the project management end much things, because when it comes down to the point where we can't meet a TPA milestone, if they already know about it, if they already know what the issues are, they know the reasons, they know what we've done to try and respond to those reasons, it's a whole lot friendlier than it is when we get against a milestone that they don't know we're going to miss and all of a sudden we raise the red flag and we say sorry guys, we blew this one. It's just not really pleasant at all when we haven't kept them informed and then find ourselves in the position of maybe missing a milestone. And if anybody would like, you can probably take my place in some of the meetings we're going to have over the next few weeks on C-018. It's just not going to be pleasant.

We agreed we need to get together in this working group to get something that's feasible. I don't think what's in here is feasible.

That could be, and we need to work through that to make sure it is and if necessary modify the permit condition.

We've been doing exactly what's in the permit now for about a year before the implementation of the permit and it's been working out smoothly.

This I think came a lot from the Grout project. That's where we started identifying the interest and the need to be involved in these kind of decisions and that's kind of the history of this. And this one has been

II.L.1.

changed a number of times. I think it got down to a couple of our in-house engineers sat down with Kaiser and mow add at the time and worked out and said yeah, this is kind of what we do.

But if you have alternate language that you think would work better then I suggest you submit it and get it up to us and I'd be glad to look at it. If there's any place we can make the permit more clear I'm game to look at it. I just wanted to let you know the spirit of what was intended here and that was keep Ecology involved.

Just for clarification, could you say where this Condition II.L. applies right now so we're not misleading people.

It would be construction projects subject to the permit, which is no interim status, which wouldn't be interstitial area. And we're looking at building new TSDs, and if you were closing a TSD as a landfill and were putting in an engineered cover on it that would apply there as well.

None of the units that are in the permit right now have anything that this is affecting.

Can DOE-RL still expand under interim status?

That's a question we're looking at right now. Ecology has an internal meeting on Friday. In my opinion I don't think so.

We talked with Steve Alexander, Dave Lundstrom, Dave Nylander and Julie Atwood yesterday about that, expressed our concern over some of the things we've been hearing and I think it's -- you guys are going to have an internal meeting on Friday. I got the impression anyway that this is going to be a subject that will tap some further discussion before there's a decision made that Dru and perhaps even some other people will need to play in this before the actual decision is reached.

I know it's an issue with the storage of sodium metal out at the 400 area. I think it's also an issue at 340.

It's also an issue with PUREX and B Plant and Z Plant and T Plant.

Anyway, if you have words that work better and do this same thing and keeps Ecology involved early I'd be happy to look at it.

What role does the unit manager have?

I think what it says in here is to get this information to an Ecology representative.

The engineer immediately informs the unit manager of the ECN or NCR, but it is the engineer's call on the approval of the ECN.

I might be wrong. I thought we used to have language in here where in these cases we specifically designated our construction inspector as delegating, having the authority to make a decision on these. So it would really be up to the unit manager to work out with the construction inspector and they should be working closer together anyway, just like a permit writer and a compliance inspector would be. But most unit managers would defer to the construction inspector. We've had cases where that doesn't happen.

As-built drawings are required within 12 months after completing construction.

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Design, construct, maintain, and operate the Hanford Facility to minimize the possibility of incidents or releases that could threaten human health or the environment.

II.L.2.a.

**Permit Condition (Sept. 94): II.L.2. Design Changes, Nonconformance, and
As-Built Drawings
II.L.2.a. Designated Representatives**

The Permittees shall conduct all construction subject to this Permit in accordance with the approved designs, plans and specifications that are required by this Permit unless authorized otherwise in Conditions II.L.2.b. or II.L.2.c. For purposes of Conditions II.L.2.b. and II.L.2.c., a Department construction inspector or TSD unit manager are designated representatives of the Department.

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Construction of TSD units will be in accordance with approved design, plans, and specifications.

II.L.2.a.

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II.L.2.b.

Permit Condition (Sept. 94): II.L.2.b. ECNs

During construction of a project subject to this Permit, changes to the approved designs, plans and specifications shall be formally documented with an Engineering Change Notice (ECN). All ECNs shall be maintained in the TSD unit-specific operating record and shall be made available to the Department upon request or during the course of an inspection. The Permittees shall provide copies of ECNs affecting any critical system to the Department within five (5) working days of initiating the ECN. Identification of critical systems shall be included by the Permittees in each TSD unit-specific dangerous waste permit application, closure plan or Permit modification, as appropriate. The Department will review an ECN modifying a critical system and inform the Permittees within two (2) working days in writing whether the proposed ECN, when issued, will require a Class 1, 2, or 3 permit modification. If after two (2) working days the Department has not responded, it will be deemed as acceptance of the ECN by the Department.

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Construction design changes will be documented in the TSD unit operating record.

The ECN's will be submitted by an ECN; and to Ecology within 5 working days for construction design changes to critical systems of a TSD unit. Within 5 working days, the ECN's on construction design changes to critical systems submitted to Ecology.

II.L.2.b.

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II.L.2.c.

Permit Condition (Sept. 94): II.L.2.c. NCRs

During construction of a project subject to this Permit, any work completed which does not meet or exceed the standards of the approved design, plans and specifications shall be formally documented with a nonconformance report (NCR). All NCRs shall be maintained in the TSD unit-specific operating record and shall be made available to the Department upon request or during the course of an inspection. The Permittees shall provide copies of NCRs affecting any critical system to the Department within five (5) working days after identification of the nonconformance. The Department will review an NCR affecting a critical system and inform the Permittees within two (2) working days in writing whether a permit modification is required of any nonconformance and whether prior approval is required from the Department before work proceeds which affects the nonconforming item. If the Department does not respond within two (2) working days, it will be deemed as acceptance and no permit modification is required.

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Any construction works completed that does not meet or exceed the standards of the approved design will be documented in the TSD unit's operating record by NCR; and within 5 working days a copy of the NCR will be submitted to Ecology. Also NCRs on critical systems will be submitted to Ecology within 5 working days.

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II.L.2.d.

Permit Condition (Sept. 94): II.L.2.d. As-Built Drawings

Upon completion of a construction project subject to this Permit, the Permittees shall produce as-built drawings of the project which incorporate the design and construction modifications resulting from all project ECNs and NCRs as well as modifications made pursuant to WAC 173-303-830. The Permittees shall place the drawings into the operating record within 12 months of completing construction, or within an alternate period of time specified in a unit-specific Condition in Part III or V of this Permit.

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Produce and place as-built drawings in the TSD unit-specific operating record within 12 months of completing construction.

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II.L.3.

Permit Condition (Sept. 94): II.L.3. Design and Operation of the Facility - Facility Compliance

The Permittees in receiving, storing, transferring, handling, treating, processing, and disposing of dangerous waste shall design, operate and/or maintain the Facility in compliance with all applicable federal, state and local laws and regulations.

Responsiveness Summary:

Workshop Synopsis: Condition II.L.3. is facility compliance, which is just kind of almost an omnibus condition that just says if you're receiving, storing, transferring, handling, treating or, doing anything with dangerous waste, you need to maintain your facility in compliance with all applicable regulations.

And Condition II.L.3. is again another omnibus condition just says whatever you do out there with dangerous waste you need to do it in accordance with all applicable laws whether they're federal state or local.

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: For TSD units incorporated into the RCRA Permit, the Permittees will maintain the Hanford Facility in compliance with all applicable federal, state, and local laws and regulations.

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II.M.

Permit Condition (Sept. 94): II.M. SECURITY

The Permittees shall comply with the security provisions of WAC 173-303-310. The Permittees may comply with the requirements of WAC 173-303-310(2) on a unit-by-unit basis.

Responsiveness Summary:

Workshop Synopsis (Oct. 94): Condition II.M., security, really just follows the dangerous waste regulations. It calls out the fact security decisions will be made on a unit-by-unit basis. It is now a unit manager's call what kind of security is needed at any particular unit.

Question: Is the language in here intended that the Permittees can choose? That's what this kind of alludes to.

Answer: I wouldn't say can choose. We're just saying don't have to do it on a big facility. We're not going to require you to put up a fence around the whole facility or anything like that. We're not going to require you to take all 560 square miles and secure it. You can do that or you can choose to secure each individual unit. But what we're not doing here is saying how to secure a particular unit.

This is the subject of some discussion on at least one or two units. The issue is still unresolved.

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Comply with the security provisions of WAC 173-303-310.

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II.N.2.

Permit Condition (Sept. 94): II.N.2. **Receipt of Dangerous Waste Generated Off-Site - Waste From Sources Outside the United States**

The Permittees shall meet the requirements of WAC 173-303-290(1) for waste received from outside the United States.

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Comply with WAC 173-303-290(1) for waste received from outside the United States.

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II.N.3.

**Permit Condition (Sept. 94): II.N.3. Receipt of Dangerous Waste Generated
Off-Site - Notice to Generator**

For waste received from off-site sources (except where the owner/operator is also the generator), the Permittees shall inform the generator in writing that they have the appropriate permits for, and will accept, the waste the generator is shipping, as required by WAC 173-303-290(3). The Permittees shall keep a copy of this written notice as part of the TSD unit-specific operating record.

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: For waste received from offsite sources when the owner/operator is not the generator, inform the generator in writing that appropriate permits are in place and that the waste will be accepted. Maintain a copy of this documentation in the TSD unit operating record.

II.N.3.

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II.O.1.

**Permit Condition (Sept. 94): II.O. GENERAL INSPECTION REQUIREMENTS
II.O.1. Sitewide Inspection Locations**

The Permittees shall inspect the Facility to prevent malfunctions and deterioration, operator errors, and discharges which may cause or lead to the release of dangerous waste constituents to the environment, or a threat to human health. Inspections must be conducted in accordance with the provisions of WAC 173-303-320(2). In addition to the TSD unit inspections specified in Parts III or V, the following inspections will also be conducted.

Responsiveness Summary:

Workshop Synopsis (Oct. 94): Condition II.O. is the facility inspection requirements, and here's where we came to the agreement that a couple of times a year, there would be walk-through inspections of the major process areas, there would be a couple of inspections a year of the Columbia River, so those are in the interstitial area.

Condition II.O. is general inspection. This is in addition to whatever inspections you're required to do at a unit. Most units I think have weekly inspections. In some cases there's certain things you have to inspect daily. Those will still need to be done. This requirement addresses more inspection of the whole facility of that interstitial area and areas of concern. It establishes annual inspections for the process areas which are defined in the condition as 100 Area, 200 East, 200 West, 300, 400 and 1100 areas. There's some criteria there for what needs to be looked at.

Question: I know we have received written comments about what we consider adequate and I think that's a fair question. I think we need to spend some time talking about do you have to look in every cupboard and every closet and every building in the 200 Area or is it a matter of driving a car in and around the buildings. So that's subject to some interpretation, but we basically want people to go out and look and see if you can find a problem. Maybe somebody who isn't aware of the dangerous waste regulations did something inappropriate.

Answer: What do we think, clarification whether we're going to look in every cupboard or whether we're just going to do a ride down the road. I guess that's something the steering committee or Kennewick office is going to have to come up with a decision on. I can't say when. We can put it as an agenda item on our next meeting and talk about it. What's required is you notify Ecology seven days in advance, and I'm sure that a Kennewick staff person will go along on these and I would say go out and do the first one with the Ecology employee and see what they think about it and go from there.

Question: What's the intent of this (II.O.1)? Are we supposed to be going in buildings and looking inside the boiler and looking at all their processes and all their monitoring equipment? You got a couple descriptions here. One place it tells you to look in WAC 173-303320 (2), tells you to look at the monitoring devices and records and then you get down into II.O.1.C. and it lays out some specific items that we should look for, orphan drums and things that are fully going to affect the environment, human health. We got from one extreme to another what these things are. What was the second extreme, one was II.O.1.C. and the other extreme was what?

II.O.1.

Answer: If you look at II.O.1., tells you inspection will be done on conditions of WAC 173-303-302 (2) which lays out some specific items you're supposed to look at, supposed to look at monitoring equipment, security. This is all the stuff that you go in and look at, go inspect a permitted TSD unit. Is that the intent of this?
That wasn't how we envisioned it being done.
I think II.O.2., and it's not clear, it says inspect the facility, but I think II.O.2. was what needed to be done at the units and that's what, and then the last sentence of II.O.1. says in addition to the TSD units do the following. I can't disagree with you that we need to clarify this. I don't have the answer right now. We'll put it on our agenda to work on but right now because we don't have the definitive answer and we can't really ding you for how you do it. And like I said maybe the best way to do it is plan one to what you think is adequate and give Ecology the seven-day notice and let them come along and they'll go along and say yeah, I think that was pretty good or maybe we should look here or there or whatever. The problem doing it that way we're talking looking a whole year into this inspection plan we're getting what we're going to do. If we go off and do the first one we're not doing it the way you want it.

Like I said we can take an action item and we can put that on our agenda and we can talk about that. We all recognize it needs more definition.

The fact of the matter is before we go off and do one of these inspections we are going to need a plan for how we're going to conduct it, and that development of that plan we'll be talking to Moses and we'll be talking to the other people in Ecology about what their expectations are and what our abilities are in terms of how much manpower and effort we can throw into it. And the arguments that went back and forth over this particular issue ranged widely all the way from one point at which I sort of lost my temper and accused Ecology of wanting to take 15,000 people arm in arm and walk the whole confounded site.

We will have to put together an inspection plan for how we're going to do it and I don't see any reason why we can't get some input from Ecology before we ever set foot on the ground so to speak.

We're willing to work with you on this one. I've never looked at such a big area say like what would I do with 200 East. I've done it with buildings where I've walked around the building, walked around every room, opened lids off containers. But to do that in 200 East or 200 West would take you a long time.

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Conduct general Hanford Facility inspections according to WAC 173-303-320(2) to prevent incidents that may cause releases that threaten human health or the environment.

II.O.1.a.

Permit Condition (Sept. 94): II.O.1.a. Sitewide Inspection Locations

The 100, 200 East, 200 West, 300, 400, and 1100 areas shall be inspected annually.

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Inspect the 100, 200 East, 200 West, 300, 400, and 1100 Areas annually.

II.O.1.a.

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II.O.1.b.

Permit Condition (Sept. 94): II.O.1.b. Sitewide Inspection Locations

The Permittees shall inspect the banks of the Columbia River, contained within the Facility boundary, two (2) times yearly. One (1) inspection shall occur at the low water mark of the year and one (1) inspection shall occur at a time chosen by the Permittees. These inspections shall be performed from the river by boat, and the inspectors shall follow the criteria in Condition II.O.1.c.

Responsiveness Summary: The Department believes that inspecting the river banks twice a year will, in conjunction with other dangerous waste management requirements contained in this Permit and the regulations, provide sufficient opportunity for detecting problem areas, while not being overly burdensome on the Permittees. The Department does agree however that the high water mark inspection is not necessarily a good time to inspect the river banks. Therefore, the Condition has been modified to require that the inspection be performed twice yearly, once at the low water mark as determined by consultation with the U.S. Army Corps of Engineers, and one other time, to be determined by the Permittees.

Workshop Synopsis (Oct. 94): Requires two inspections per year of the Columbia River. Requirements are that they be done at the low water mark and the other one is done at the choice of the Permittees.

Once again, river inspections twice a year.

Question: What kind of things are you looking for the river inspections? Where the salmon are? What do you mean by semi annual inspections of the river? Are you talking about TSDs that are located on the boundary right at the river? Are you talking about the whole Reach?

Answer: Talking about the whole Reach and a lot of this -- came from the public who is mostly concerned about what is hitting the river after we made a commitment we'd be looking at the river.

What are you looking for?

Floating drums, seeps coming out of the banks, and dead vegetation in the desert is easy to find. Any kind of problems. Corpses. Pipes that are hanging out with black stuff running out of it.

Is your inspection -- you mean you're going to sample the seeps on a semiannual basis?

No. This is something we'll have to put an inspection plan for, but conceptually just go up and down the river and make sure no one has done anything along the banks of the river that could have an adverse impact on the river itself. There are a lot of people who use that stretch of the river and throw their garbage out. There's also things that happen upstream where there may be things that float down and land on the banks down here. In addition there are things like the outfall that suddenly appeared along the banks out there at one point. We need to check on those kinds of things.

Who has the lead on this? Which contractor?

I don't think that's been completely decided yet, but there's a requirement here that we're going to have to meet.

We're working on the inspection plan and getting that all together.

There is funding.

The river inspection only takes in banks of the confines, not the whole Reach because the Reach is considered all the way up.

Yes, just that part that is the Hanford Facility.

The condition also goes on to talk about if there's remedial action, if you find a bunch of stuff spilled on the ground basically you'd suggest remedial action and get approval from Ecology on that. Also there's special considerations given high radiation areas, recognize some places out in those areas that you don't necessarily want to be walking around picking up rocks

II.O.1.b.

and looking for things so we're willing to accommodate those kinds of concerns.

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: The Permittees will conduct general Hanford Facility semiannual inspections of the Columbia River Banks within the Hanford Facility boundary.

II.O.1.c.

Permit Condition (Sept. 94): II.O.1.c. Sitewide Inspection Parameters

The Permittees shall visually inspect the areas identified in Conditions II.O.1.a. and II.O.1.b. for malfunctions, deterioration, operator errors, and discharges which may cause or lead to the release of dangerous waste constituents to the environment, or that threaten human health. Specific items to be noted are as follows:

- i. Remains of waste containers, labels or other waste management equipment;
- ii. Solid waste disposal sites not previously identified for remedial action;
- iii. Uncontrolled waste containers (e.g., orphan drums);
- iv. Temporary or permanent activities that could generate an uncontrolled waste form; and,
- v. Unpermitted waste discharges.

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: General Hanford Facility inspections will be for malfunctions, deterioration, operator errors, and discharges.

II.O.1.c.

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II.O.1.d.

Permit Condition (Sept. 94): II.O.1.d. Sitewide Inspection Notification(s)

The Permittees shall notify the Department at least seven (7) days prior to conducting these inspections in order to allow representatives of the Department to be present during the inspections.

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Notify Ecology 7 days before general Hanford Facility inspections occur.

II.O.1.d.

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II.O.2.

Permit Condition (Sept. 94): II.O.2. Inspection Remediation and Schedule

If the inspection by the Permittees conducted pursuant to Condition II.O.1. reveals any problems, the Permittees shall take remedial action on a schedule agreed to by the Department.

Responsiveness Summary: The Department agrees that not all problems discovered by this inspection should be addressed under authority of the Dangerous Waste Regulations. For those parts of the Hanford Facility that are TSDs, WAC 173-303-320(3) certainly would apply. However, for other areas, some of which may already be classified as CERCLA or RCRA past-practice sites under the FFACO, this regulation is not appropriate.

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: If general Hanford Facility inspections reveal problems, take remedial action on a schedule agreed to by Ecology.

II.O.2.

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II.0.3.

Permit Condition (Sept. 94): II.0.3. Rad Area Inspections

The inspection of high radiation areas will be addressed on a case-by-case basis in either Part III of this Permit or prior to the inspections required in Condition II.0.1.

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: On a case-by-case basis, high radiation areas will be inspected during general Hanford Facility inspections.

II.O.3.

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II.P.1.

**Permit Condition (Sept. 94): II.P. MANIFEST SYSTEM
II.P.1. Manifesting Requirements**

The Permittees shall comply with the manifest requirements of WAC 173-303-370 for waste received from off-site and WAC 173-303-180 for waste shipped off-site.

Responsiveness Summary:

Workshop Synopsis (Oct. 94): Conditions II.P., Manifest System, points towards WAC subsection 180 for waste transported offsite. Subsection 370 is receipt of waste from offsite. Basically says you have to use the uniform manifest system. We define in this condition what we consider to be off-site. Highways you see listed up there are what we consider offsite, not if you cross them but if you travel along those roads we consider that an offsite shipment and therefore requires a manifest paperwork. 4 South with the parentheses Wye Barricade means travel on 4 South of the Wye Barricade. And we also have the barricade option, which is if the Permittee so chooses, instead of doing the manifests if they want to block the road so the public doesn't have access and send their shipment and open up the road we will accept that in lieu of documentation.

Question: This question of traveling with the manifest only on these particular surfaces, does this take into consideration there's a lot of movement within the 300 Area itself that's not really considered part of a closed public area and some of the other offices and areas from building to building across parking lots and small back roads?

Answer: The question is does this condition consider waste movement around places like within the 300 Area. And the answer is no, this condition doesn't, but the next Condition II.Q. does. II.P. is geared more for what we call offsite waste transport. Condition II.Q. is where we address onsite waste transport.

The contiguous Hanford Site minus a couple of holes, but essentially if you think of the contiguous Hanford Site that's what this RCRA permit covers.

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Comply with the manifest requirements of WAC 173-303-370 for waste received from offsite and WAC 173-303-180 for waste shipped offsite.

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II.P.2.

Permit Condition (Sept. 94): II.P.2. On-Site, Public Road Manifests

Transportation of dangerous wastes along State Highways 240, 24, and 243, and Route 4 South (Stevens Drive) south of the Wye Barricade, if such routes are not closed to general public access at the time of shipment, shall be manifested pursuant to Condition II.P.1.

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Transportation of wastes along roadway 240, 24, 243, and Stevens Drive south of the Wye Barricade requires manifesting unless the roadways are closed to the general public during shipment.

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II.Q.1.

**Permit Condition (Sept. 94): II.Q. ON-SITE TRANSPORTATION
II.Q.1. On-Site Waste Manifest Requirements**

Documentation must accompany any on-site dangerous waste which is transported to or from any TSD unit subject to this Permit through or within the 600 Area, unless the roadway is closed to general public access at the time of shipment. Waste transported by rail or by pipeline is exempt from this Condition. This documentation shall include the following information, unless other unit-specified provisions are designated in Part III or V.

Responsiveness Summary: To make the Condition more compatible with the existing system, the Department agrees to not require regulatory agency notification for on-site manifest discrepancies. The Permittees will only be required to place documentation in the operating record for the Department's review at an inspection.

Workshop Synopsis (Oct. 94): Condition II.Q. is On-Site Waste Transportation. If you're in the interstitial area, and you are generator and you send waste to a permitted TSD, there's some paperwork requirements you have.

Condition II.Q. does address transportation of waste in and around the Hanford Facility states that documentation is required for onsite transportation if waste is transported to or from a TSD unit that's in the permit and it goes through the 600 area. Again, there's the barricade option, they choose not to do the paperwork, roads can be blocked off and waste can be sent otherwise. I think this is an important condition for the people that work in the interstitial areas because if you're a waste generator or if you're working at a CERCLA operable unit and you're going to send waste at 616 NRDWSF to be manifested offsite, you need to comply with this condition. There's also some specifics on what the documentation needs to include. There's also a provision that if you're going to move noncontainerized waste like piles of dirt in the back of a dump truck then it needs to be covered to reduce the point of waste escape.

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Documentation must accompany any onsite dangerous waste transported through or within the 600 area unless the roadway is closed to public access at the time. Transport by rail or pipeline is exempt.

II.Q.1.

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II.Q.1.a.

Permit Condition (Sept. 94): II.Q.1.a. On-Site Waste Manifest Requirements

Generator's name, location and telephone number;

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: During onsite waste transportation on public roads, the waste manifest will identify the waste generator's name, location, and telephone number.

II.Q.1.a.

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II.Q.1.b.

Permit Condition (Sept. 94): II.Q.1.b. On-Site Waste Manifest Requirements

Receiving TSD unit's name, location, and telephone number;

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: During onsite waste transportation on public roads, the waste manifest will identify the receiving TSD unit's name, location, and telephone number.

II.Q.1.b.

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II.Q.1.c.

Permit Condition (Sept. 94): II.Q.1.c. On-Site Waste Manifest Requirements

Description of waste;

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: During onsite waste transportation on public roads, the waste manifest will contain the description of the waste.

II.Q.1.c.

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II.Q.1.d.

Permit Condition (Sept. 94): II.Q.1.d. On-Site Waste Manifest Requirements

Number and type of containers;

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: During onsite waste transportation on public roads, the waste manifest will identify the number and type of containers.

II.Q.1.d.

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II.Q.1.e.

Permit Condition (Sept. 94): II.Q.1.e. On-Site Waste Manifest Requirements

Total quantity of waste;

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: During onsite waste transportation on public roads, the waste manifest will identify the total quantity of waste.

II.Q.1.e.

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II.Q.1.f.

Permit Condition (Sept. 94): II.Q.1.f. On-Site Waste Manifest Requirements

Unit volume/weight;

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: During onsite waste transportation on public roads, the waste manifest will identify the unit volume/weight of the waste.

II.Q.1.f.

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II.Q.1.g.

Permit Condition (Sept. 94): II.Q.1.g. On-Site Waste Manifest Requirements

Dangerous waste number(s); and,

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: During onsite waste transportation on public roads, the waste manifest will identify the dangerous waste number(s).

II.Q.1.g.

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II.Q.1.h.

Permit Condition (Sept. 94): II.Q.1.h. On-Site Waste Manifest Requirements

Any special handling instructions.

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: During onsite waste transportation on public roads, the waste manifest will identify any special handling instructions.

II.Q.1.h.

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II.Q.2.

Permit Condition (Sept. 94): II.Q.2. Waste Transportation Covers

All non-containerized solid, dangerous waste transported to or from TSD units subject to this Permit shall be covered to minimize the potential for material to escape during transport.

Responsiveness Summary: The Department does not believe that the Permittees must completely "prevent" the escape of materials as they would need to package the waste in preparation for all possible contingencies. Although the Department will accept the recommended change, the Department will expect the Permittees to prepare waste shipments accounting for likely contingencies (i.e., wind, shifting loads, road conditions, etc.).

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Noncontainerized solid, dangerous waste transported to or from TSD units will be covered during transport to minimize the potential for material to escape.

II.Q.2.

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II.R.1.

Permit Condition (Sept. 94): II.R. EQUIVALENT MATERIALS
II.R.1. Equivalent Materials - Requirements

The Permittees may substitute an equivalent or superior product for any equipment or materials specified in this Permit. Use of equivalent or superior products shall not be considered a modification of this Permit. A substitution will not be considered equivalent unless it is at least as effective as the original equipment or materials in protecting human health and the environment.

Responsiveness Summary:

Workshop Synopsis (Oct. 94): Condition II.R., Equivalent Materials, allows the Permittees to make substitutions, things that's limited not to processes but to people and to materials, products, equivalent or superior can be used. Need only put that in the operating record, again within 7 days of putting the substitution into effect. Once it's in the operating record Ecology inspects it. If they like it. If they don't they put in writing why it doesn't and you agreed to go back to the original product until you can find more adequate statute.

If you're going to deal with the equivalent materials provision and you want to try to use an equivalent material and not force a permit modification, you really need to have substantive documentation that shows that what you've got is equivalent to or better than the original product. And we got into an exercise on grout on this and there was a fair amount of discussion about whether the material was equivalent or better than. So if anybody suggests that they're going to replace something with equivalent material, make sure that they have good solid documentation that they can show to anyone who asks that will demonstrate that equivalency or better than requirement. It's not just a matter of our word; it's a matter of being able to prove it's equivalent or better than.

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Permittees may substitute equivalent or better equipment or materials without a permit modification.

II.R.1.

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II.R.2.

Permit Condition (Sept. 94): II.R.2. Equivalent Materials Documentation

The Permittees shall place in the operating record (within seven (7) days after the change is put into effect) the substitution documentation, accompanied by a narrative explanation, and the date the substitution became effective. The Department may judge the soundness of the substitution.

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Document in the TSD unit-specific operating record each substitution of equivalent/superior materials, equipment, or products.

II.R.2.

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II.R.3.

Permit Condition (Sept. 94): II.R.3. Equivalent Materials - Regulator Revision

If the Department determines that a substitution was not equivalent to the original, it will notify the Permittees that the Permittees' claim of equivalency has been denied, of the reasons for the denial, and that the original material or equipment must be used. If the product substitution is denied, the Permittees shall comply with the original approved product specification or find an acceptable substitution.

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Permittees will document equivalent equipment and materials substitutions; if Ecology denies such substitutions, the originally approved equipment or material, or an acceptable substitution, must be used.

II.R.3.

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II.S.

Permit Condition (Sept. 94): II.S. LAND DISPOSAL RESTRICTIONS

Unless specifically identified otherwise in the FFACO, the Permittees shall comply with all Land Disposal Restriction requirements as set forth in WAC 173-303-140.

Responsiveness Summary:

Workshop Synopsis (Oct. 94): Condition II.S. is land disposal restrictions; that's obviously applicable across the site. It just recites the regulation subsection 140 unless the TPA authorizes otherwise.

This requirement is already found in the HSWA Permit Condition II.F.

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Comply with all Land Disposal Restriction requirements set forth in WAC 173-303-140.

II.S.

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II.T.

Permit Condition (Sept. 94): II.T. ACCESS AND INFORMATION

To the extent that work required by this Permit must be done on property not owned or controlled by the Permittees, the Permittees must utilize their best efforts to obtain access and information at these locations.

Responsiveness Summary: This requirement is not just limited to the HSWA Permit as it may be applied to spills or releases which may leave the facility boundary. The Department believes it is important for the Permittees to understand that if contamination leaves the Facility, or some other Permit-related work must be conducted off the Facility, they are still responsible for compliance with the Permit. The Department recognizes that the Permittees will not have ultimate control over activities occurring off-site. This is the reason for only requiring them to use "best efforts" instead of requiring strict adherence to Permit Conditions. The Department also believes that should a release move off-site and require cleanup, that event will be significant enough to require Department oversight to ensure protection of human health and the environment. The concept of this requirement is also found in WAC 173-303-645(2) and (11).

Workshop Synopsis (Oct. 94): Condition II.T. is accessing information, and that's if there's some kind of a release that goes offsite, it's talking about access to non-DOE-RL land. So there could be a situation where you're doing corrective action or something like that.

This requires the Permittees to use best efforts if the permit requires them to do work offsite. In case there's a major release, the permit says you have to chase that across the river, the Permittees need to make best efforts getting access to cross the other parties property.

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: The Permittees must use their best effort to obtain access and information from offsite sources on work done not owned or controlled by the Permittees.

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II.U.1.

Permit Condition (Sept. 94): II.U. MAPPING OF UNDERGROUND PIPING
II.U.1. Mapping and Marking Strategy Plan

Within 24 months of the effective date of the Permit, the Permittees shall submit a report to the Department which describes the procedures proposed to be used to compile the information required by Conditions II.U.2., II.U.3., and II.U.4. The report shall describe the methods which will be used to retrieve the piping information, the estimated accuracy of the data to be provided, quality assurance and/or quality control techniques to be employed including field verification activities (i.e., surveying, ground penetrating radar, etc.) to support information gathered from existing drawings, and conceptual examples of the product which will be submitted.

Responsiveness Summary: The primary reason for requiring the mapping of underground pipes is to comply with regulations regarding the identification of dangerous waste activities. The information required in Condition II.U. is also necessary to locate and assess potential environmental problems associated with these pipes. Providing the location of dangerous waste activities is an elemental piece of information in dangerous waste management.

The regulatory basis for requiring the mapping of underground pipes is found in WAC 173-303-806(4)(a)(xviii)(L) which states that a map must be provided which "clearly" shows the "location of operational units within the TSD facility site, where dangerous waste is (or will be) treated, stored, or disposed..." and WAC 173-303-806(4)(c)(iv) which states that "a diagram of piping, instrumentation, and process flow for each tank system" must be provided. In addition, WAC 173-303-806(a)(xxiii)(A)(I) requires "The location of the [solid waste management] unit on the topographic map required under (a)(xviii) of this subsection" must be submitted for each solid waste management unit. As TSD units are solid waste management units, the locational information of the underground waste transfer pipes must be provided. WAC 173-303-800(8) specifies that each permit issued shall contain terms and conditions as the Department determines necessary to protect human health and the environment.

The Department is not requiring mapping and marking of underground pipes as a priority over future land use and removing tank waste. The Department views this Condition as supporting decisions on future site use and closure of the tank systems at Hanford. Identifying waste and waste systems that currently exist there will certainly support all parties in making sound decisions about future waste disposal in these areas to include the burial grounds and tank systems.

Workshop Synopsis (Oct. 94): Condition II.U., Mapping and Marking of Underground Piping. This is one of two general conditions applicable to interim status units. It addresses underground pipes on the facility-wide basis so instead of having separate maps and different locations it tries to compile all the information on the pipes, the underground pipes that are regulated by the dangerous waste regulations, sets up a compliance schedule as I've outlined on the overhead. Within 24 months a report is submitted that lays out how this is going to be done. This was added primarily so there's not a gross expenditure of dollars and we look at the product and say no, that's not what we meant. So this is kind of a heads up report this is what we're looking for.

Requires in 3 years that any pipelines that are outside of major fenced areas requires that these maps be produced showing their locations. In

II.U.1.

4 years schematics need to be provided of those areas that are within fenced security areas, and the fenced areas we're talking about are 200 East, 200 West, 100 K, and then 300 to 400 areas. And then also in 48 months we get maps of those same pipes in the fenced in areas. Also a requirement for annual updates to these maps. And the value engineering studies is not a permit condition we've agreed to enter into such a study with the Permittees and this is Ecology and the Permittees to look at alternative ways to get this information, meet the needs whether we use the permit condition or not. But we agreed to look much closer at this condition and decide does it need to be done, what's the value we get out of it and how much will it really cost.

If you remember, the only general condition that's applicable is mapping and marking of underground pipes. If personnel are doing something for that condition, then all of Part I applies. Otherwise it doesn't. So it's a very small time that one would apply.

Value Engineering Study (May 1995)

1. Report--This report will not have a certifying statement associated with it. Rather the maps will be certified as to meeting the criteria as set forth in this report. This will minimize the certifying signatures required. The draft ICF KH white paper on the mapping and marking process as well as the Function Analysis and VE study reports may be used as input to this report.
2. Depth of Piping--The permit requires listing the depth of piping but does not specify how, nor at what locations, depth is to be reported. It is proposed that the pipe's depth be reported as its elevation at key points along its route. References of existing drawings which provide elevation information will be furnished along with the map submittals. These references may be listed on the map attachments. The II.U.1. report will describe how depth is indicated. This method eliminates redundancy in reporting pipe depths as a pipe's elevation is a standard that does not change. Using elevations at key points for depth information will meet the permit requirements. A disadvantage to using reference drawings is that users must utilize different documents to obtain detailed depth information.
3. Eliminate Separate Schematics--Originally, there was to be separate submittals of schematics and maps as identified in the permit conditions. It is proposed that any additional information required on the schematic submittals, including direction of flow and pipe status (active, inactive, or abandoned), be included on the maps submittals, thus eliminating the need for separate schematics. The advantages to eliminating the schematic submittal is that it saves a significant amount of time and money while still meeting the permit condition.
4. Certify Map Submittal--Certification requirements needed clarification. Originally, map submittals and the II.U.1. report were both thought to require certification. Once certification requirements were cleared up, it was proposed that certification be on the map submittals only. The maps would receive certification that they meet the criteria defined in the II.U.1. report. This proposal does not diminish the quality of the report in any way, meets permit conditions, and minimizes the reviews associated with certified submittals on the report.
5. QA/QC Description--Permit conditions II.U.2., II.U.3. and II.U.4. require that each map submittal be accompanied by a description of the quality

II.U.1.

assurance and quality control measures used to compile the maps. This proposal suggests that data sources be identified for each map submittal and that a description of the different data source types be included in the II.U.1. report. This method clearly communicates the data source to the map user, standardizes and simplifies the re-submittal process and meets the permit conditions. One drawback is that it requires users to refer to II.U.1. report to clearly understand the data sources.

6. Pipe Attributes--Map submittals are required to provide specific piping information such as status, size, depth, material, etc. This proposal moves those attributes (like size, depth, material, and status) from the face of the map to a map attachment. Listing these pipe attributes on an attachment will ease reporting during the annual updates should updated information become available, will still meet the permit conditions, and will reduce the cost for annual updates. Users may have to reference between the map and its attachment in order to obtain detailed information on a pipelines. Map attachments may cost slightly more originally due to the addition of this information.
7. TSD Complex Perimeters--Originally, all applicable dangerous waste underground lines connected to a TSD were to be mapped starting at the TSD facility building wall. This approach included mapping those pipelines that were routed between or around a facility's buildings regardless of whether or not the pipeline ever left the TSD's immediate vicinity.

As part of this proposal, each TSD would have a "TSD complex perimeter" identified for it. The TSD complex perimeter would be established close to the actual TSD. A TSD complex may include various nearby buildings associated with the facility, may be defined a few feet from the TSD building wall, may or may not be identified with a facility's fence or permitted TSD boundary and will be established for mapping and marking purposes only. Descriptions of these TSD complexes will be included in the II.U.1. report.

As this proposal defines a structure/building to include TSD complexes, intra-complex piping (piping inside a TSD complex, i.e., pipelines between a facility's buildings or around a facility that do not leave the TSD's immediate vicinity) need not be mapped. Intra-complex pipeline drawing references will be provided with each map's submittal. Inter-complex piping between TSD facilities (i.e., piping that exits the TSD complex) will be mapped starting at the TSD building wall (within the TSD complex). Fenced tank farms are excluded from TSD complex definitions.

The advantages of incorporating this proposal are that it is not a permit modification, it meets permit conditions, eliminates redundancies and reduces cost. However, not all the lines associated with a TSD will be available on a single source, so users will need to utilize different documents to obtain detailed intra-complex piping information.

Inspection Guidance:

Permittee (ID) Guidance:

II.U.1.

Requirement Summary: By September 30, 1996, the Permittees will submit plan(s) describing the proposed procedures to be used to compile the mapping and marking requirements of Permit Conditions II.U. and II.V.

II.U.2.

Permit Condition (Sept. 94): II.U.2. Initial Mapping Submittal (Outside Fences)

Within 36 months of the effective date of this Permit, the Permittees shall make an initial submittal to the Department of maps showing the location of dangerous waste underground pipelines (including active, inactive, and abandoned pipelines which contain or contained dangerous waste subject to the provisions of Chapter 173-303 WAC) on the Facility which are located outside of the fences enclosing the 200 East, 200 West, 300, 400, 100N, and 100K Areas. These maps shall identify the origin, destination, size, depth and type (i.e., reinforced concrete, stainless steel, cast iron, etc.) of each pipe and the location of their diversion boxes, valve pits, seal pots, catch tanks, receiver tanks, and pumps, utilizing Washington State Plane Coordinates, NAD 83(91), meters. If the type of pipe material is not documented on existing drawings, the most probable material type shall be provided. These maps shall be accompanied by a description of the quality assurance and quality control measures used to compile the maps.

The age of all pipes required to be identified pursuant to this Condition shall be documented in an attachment to the submittal. If the age cannot be documented, an estimate of the age of the pipe shall be provided based upon best engineering judgement.

These maps, and any attachments, shall be maintained in the Facility Operating Record and updated annually after the initial submittal with new or revised information. Each map submittal required by this Condition shall incorporate information available six months before the scheduled submittal date.

Responsiveness Summary:

Workshop Synopsis: Refer to II.U.1. for Value Engineering Study (May 1995).

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: By September 29, 1997, the Permittees will submit maps identifying the location and characteristics of all dangerous waste underground pipelines outside the fences of the 200 East 200 West 300, 400, 100-N and 100-K Areas. These maps will be updated annually and maintained in the Facility Operating Record.

II.U.2.

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II.U.3.

Permit Condition (Sept. 94): II.U.3. Piping Schematic Submittal

Within 48 months of the effective date of this Permit, the Permittees shall make an initial submittal to the Department of piping schematics for dangerous waste underground pipelines (including active, inactive, and abandoned pipelines which contain or contained dangerous waste subject to the provisions of Chapter 173-303 WAC) within the 200 East, 200 West, 300, 400, 100N, and 100K Areas. The piping schematics shall identify the origin, destination, and direction of flow for each pipe, as well as whether the pipe is active, inactive, or abandoned. These schematics need not include the pipes within a fenced tank farm or within a building/structure. These schematics shall be accompanied by a description of the quality assurance and quality control measures used to compile the maps.

These schematics and any attachments, shall be maintained in the Facility Operating Record and updated annually after the initial submittal with new or revised information. Each map submittal required by this Condition shall incorporate information available six months before the scheduled submittal date.

Responsiveness Summary:

Workshop Synopsis: Refer to II.U.1. for Value Engineering Study (May 1995).

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: By September 28, 1998, the Permittees will submit piping schematics identifying the location and characteristics of all dangerous waste underground pipelines inside the 200 East 200 West 300, 400, 100-N, and 100-K Areas. The schematics will not include the pipes within the fenced tank farms nor inside buildings. These piping schematics will be updated annually and maintained in the Facility Operating Record.

II.U.3.

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II.U.4.

Permit Condition (Sept. 94): II.U.4. Inside Fences Submittal

Within 48 months of the effective date of this Permit, the Permittees shall make an initial submittal to the Department of maps showing the location of dangerous waste underground pipelines (including active, inactive, and abandoned pipelines which contain or contained dangerous waste subject to the provisions of Chapter 173-303 WAC) within the 200 East, 200 West, 300, 400, 100N, and 100K Areas. These maps will incorporate information available six months prior to the scheduled submittal date. Thereafter, the maps will be updated on an annual basis to incorporate additional information, as such information becomes available in accordance with the FFACO milestone schedule. A schedule for the provision of map input shall be included in the report specified in Condition II.U.1.

The maps shall identify the origin, destination, size, depth and type (i.e., reinforced concrete, stainless steel, cast iron, etc.) of each pipe and the location of their diversion boxes, valve pits, seal pots, catch tanks, receiver tanks, and pumps, and utilize Washington State Plan Coordinates, NAD 83(91), meters. If the type of pipe material is not documented on existing drawings, the most probable material type shall be provided. These maps need not include the pipes within a fenced tank farm or within a building/structure. These maps shall be accompanied by a description of the quality assurance/quality control used to compile the maps.

The age of all pipes required to be identified pursuant to this Condition shall be documented in an attachment to the submittal. If the age cannot be documented, an estimate of the age of the pipe shall be provided based upon best engineering judgement.

These maps, and any attachments, shall be maintained in the Facility Wide Operating Record and updated annually after the initial submittal with new or revised information.

Responsiveness Summary:

Workshop Synopsis: Refer to II.U.1. for Value Engineering Study (May 1995).

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: By September 28, 1998, the Permittees will submit maps identifying the location and characteristics of all dangerous waste underground pipelines inside the fences of the 200 East 200 West 300, 400, 100-N, and 100-K Areas. These maps will not include pipes within fenced tank farms or inside buildings. These maps shall be updated annually and maintained within the Facility Operating Record.

II.U.4.

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II.V.

Permit Condition (Sept. 94): II.V. MARKING OF UNDERGROUND PIPING

Within 36 months of the effective date of this Permit, the Permittees shall mark the underground pipelines identified in Condition II.U.2. These pipelines shall be marked at the point they pass beneath a fence enclosing the 200 East, 200 West, 300, 400, 100N or 100K Areas, at their origin and destination, at any point they cross an improved road and every 100 meters along the pipeline corridor where practicable. The markers shall be labeled with a sign that reads "Buried Dangerous Waste Pipe" and shall be visible from a distance of 15 meters.

Responsiveness Summary: The Department notes WAC 173-303-640(5)(d) states that tank systems (which include pipelines) carrying dangerous waste must be marked. WAC 173-303-800(8) specifies that each permit issued shall contain terms and conditions as the Department determines necessary to protect human health and the environment.

Workshop Synopsis (Oct. 94): Condition II.V. is marking of underground pipes within 3 years. Those pipes that were mapped that were outside of fenced areas need to be marked above ground, they get marked at their origin, their destination, where they cross improved roads, and every 100 meters otherwise. If you remember, the only general conditions that are applicable are mapping and marking of underground pipes. If personnel are doing something for that condition, then all of Part I applies. Otherwise it doesn't. So it's a very small time that Part I would apply.

Question: Those conditions address all pipelines that handle all hazardous waste?

Answer: It addresses pipelines that had dangerous waste subject to the dangerous waste regulations, so it wouldn't address pipelines that discontinued use in the '40s, '50s, '60s, '70s. There's a discrepancy between Ecology and the Permittees on what is the date and we're going to work that out. This report that gets submitted, the Department of Energy says the date we need to look at is 1987.

...1987 and Ecology, it should be '84. So that's still unclear which date we're going to use, but basically if it didn't carry the waste prior, say prior to 1980, then it wouldn't be included in these maps.

It may turn out to be an academic argument. It may not be a big deal or it might.

The difference is 1980 is definitely a trigger for non-mixed dangerous waste, it was regulated in '80. Mixed waste, there's legal arguments about when mixed waste began to be regulated and that's why there's a discrepancy on mixed waste between '84 and '87.

Question: What was the intent behind requiring this new practice?

Answer: To provide comprehensive maps that show the facility and not a map that shows here's the PUREX pipes and here's B Plant pipes and be separate. So we wanted one map that clearly showed the underground dangerous waste locations at Hanford. Now, part of the value engineering says we're going to look closely at what is available, how could that be compiled, how could that be used to satisfy our needs.

II.V.

Refer to II.U.1. for Value Engineering Study (May 1995).

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: By September 29, 1997, the Permittees will 'post' the location of all dangerous waste pipelines outside the fences of the 200 East, 200 West, 300, 400, 100-N, and 100-K, Areas located at fences and at road crossings, and 100 meter intervals. The posts will read "Buried Dangerous Waste Pipe" and be visible from 15 meters.

II.W.1.

Permit Condition (Sept. 94): II.W. OTHER PERMITS AND/OR APPROVALS
II.W.1. Other Permit Compliance and Documentation

The Permittees shall be responsible for obtaining all other applicable federal, state, and local permits authorizing the development and operation of the Facility. To the extent that work required by this Permit must be done under a permit and/or approval pursuant to other regulatory authority, the Permittees shall use their best efforts to obtain such permits. Copies of all documents relating to actions taken, pursuant to this Condition, shall be kept in the operating record.

Responsiveness Summary: The Department has enhanced the exact wording of WAC 173-303-800(5) to prevent the acquisition of other permits from delaying compliance with this Permit. However, the Department agrees to preface the existing language of this Condition with the wording from WAC 173-303-800(5).

The Department believes that defining the term "best efforts" removes the ambiguity of the Condition and was placed in this Condition to help clarify how the Department would make "best effort" judgements.

Workshop Synopsis (Oct. 94): Condition II.W. is other permits. Example would be you're going to run an incinerator and you need an air permit, you need to make all the efforts to get that air permit in addition to the dangerous waste permit. Also states these permits are severable. If there's a problem with the one permit doesn't mean the other permit has a problem, and specifically calls outside air emissions as a place where attention needs to be paid on other permits and that's because air emission regs are applicable at a number of places on the Hanford Facility.

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Obtain all applicable federal, state, and local permits authorizing the development and operation of the Hanford Facility. Maintain all documents and related records in the Facility Operating Record.

II.W.1.

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II.W.2.

Permit Condition (Sept. 94): II.W.2. Other Permits Enforceability

All other permits related to dangerous waste management activities are severable and enforceable through the permitting authority under which they are issued.

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: All other permits related to dangerous waste management activities are severable and enforceable through the permitting authority under which the Permits are issued.

II.W.2.

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II.W.3.

Permit Condition (Sept. 94): II.W.3. Air Emissions

All air emissions from TSD units subject to this Permit shall comply with all applicable State and Federal regulations pertaining to air emission controls, including but not limited to, Chapter 173-400 WAC, General Regulations for Air Pollution Sources; Chapter 173-460 WAC, Controls for New Sources of Toxic Air Pollutants; and Chapter 173-480 WAC, Ambient Air Quality Standards and Emission Limits for Radionuclides.

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: The TSD units incorporated into the Permit will comply with all applicable federal and state regulations pertaining to air emission controls.

Comment: Need to address the Benton County air pollution control authority.

II.W.3.

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II.X.1.

Permit Condition (Sept. 94): II.X. SCHEDULE EXTENSIONS
II.X.1. Schedule Extension Notifications

The Permittees shall notify the Department in writing as soon as possible of any deviations or expected deviations from the schedules of this Permit. The Permittees shall include with the notification all information supporting their claim that they have used best efforts to meet the required schedules. If the Department determines that the Permittees have made best efforts to meet the schedules of this Permit, the Department shall notify the Permittees in writing by certified mail that the Permittees have been granted an extension. Such an extension shall not require a permit modification under Condition I.C.3. Should the Department determine that the Permittees have not made best efforts to meet the schedules of this Permit, the Department may take such action as deemed necessary.

Copies of all correspondence regarding schedule extensions shall be kept in the operating record.

Responsiveness Summary: Maintaining copies of such records in the operating record is important to verify Permit compliance, provide a known location where operators and regulators can look for authorized changes, and establish written history to support or deny future schedule extension requests.

Workshop Synopsis (Oct. 94): Condition II.X. is Schedule Extensions. If there's anything that you can't do in the timeframe identified in the permit, you have the right to ask for a schedule extension. If you have a date, a submittal date that's a schedule -- so basically if you want to change any time that you need to comply with you have the right to submit for an extension, a request for an extension, and then we review that and make a determination. It also states that the change made at the TPA that impacts the permit, the permit honors that change. So maybe you have a permit for the vitrification plant showing an operation date of one date but the TPA has another date and it gets changed in the TPA; this has to get changed in the permit as well.

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Notify Ecology in writing of any deviations or expected deviations from schedules under the RCRA Permit.

Maintain copies of all correspondence regarding schedule extensions in the Facility Operating Record.

II.X.1.

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II.X.2.

Permit Condition (Sept. 94): II.X.2. Schedule Extensions Approval

Any schedule extension granted through the approved change control process identified in the FFACO shall be incorporated into this Permit. Such a revision shall not require a Permit modification under Condition I.C.3.

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Any schedule extension granted through the approved change control process identified in the FFACO will be incorporated into the RCRA Permit.

II.X.2.

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III.1.A.

Permit Condition (Sept. 94): III.1.A. COMPLIANCE WITH APPROVED PERMIT APPLICATION

The Permittees shall comply with all the requirements set forth in the *616 Nonradioactive Dangerous Waste Storage Facility Permit Application*, Rev. 2, as found in Attachment 8, including the amendments specified in Condition III.1.B. Enforceable portions of the application are listed below (All subsections, figures, and tables included in these portions are also enforceable unless stated otherwise):

Part A Application

Section 2.1.3	The 616 Non-radioactive Dangerous Waste Storage Facility Description
Section 2.2	Topographic Maps
Section 2.5	Performance Standards
Section 2.7.1	Spills and Discharges Into the Environment
Section 2.8	Manifest System
Chapter 3.0	Waste Characteristics
Chapter 4.0	Process Information
Chapter 6.0	Procedures to Prevent Hazards
Chapter 7.0	Contingency Plan
Chapter 8.0	Personnel Training
Chapter 11.0	Closure and Post-Closure Requirements
Chapter 12.0	Reporting and Recordkeeping
Section 13.7	Toxic Substance Control Act of 1976
Section 13.8	Other Requirements
Appendix 2A	Drawing H-13-000014, 616 NRDWSF Topographic Map
Appendix 4B	Drawing H-6-1553, Architectural Plan, Elevations and Sections, Rev. 3
Appendix 4B	Drawing H-6-1556, Structural Plan and Sections, Rev. 2
Appendix 7A	Building Emergency Plan - 616 Building
Appendix 11B	Description of Procedures

Responsiveness Summary: In addition, see the response to Comment 18.147.

In regard to replacing a specific revision number with the term "as amended", see the response to Comment 19.5 in the unit-specific comments for the Attachments section.

Required elements will be defined under the "critical systems" concept, which is still being developed. Until this concept is developed and implemented for 616, the Department will not incorporate Appendix 4A into the Permit.

Workshop Synopsis (Oct. 94): We shouldn't go to too much detail here because I'll just say first of all 616 we'd be happy to show you all our documentation. We'd be happy to make that decision by the weight ourselves. We're comfortable with call making and I believe we have confirmation of those calls. The person that operates the test has got to have some professional judgment, I hope you guys are expecting that to be happening and that the range and the tolerance varies with the type of waste, the nature of the waste and a lot of other things and that deals with experience and other things. That's the kind of test that we have developed here and by the way the type of

III.1.A.

test that I can get results from in two or three hours versus two or three days, and as far as I'm concerned verification needs to be done before you accept the waste. So we have a time limit kind of issue here that we make good credible, addressable, professional judgments. And so let's not go too crazy here. You guys need to be comfortable with what we're doing and we're willing to have you stand next to us and explain that stuff. To get down to this is what's right on paper and set up procedures is going to drive us crazy.

I don't want to add anything to the permit conditions or to the permit application, but I want everyone to understand that when it says we're testing for cyanide what that is telling you, what that test tells you. Does it say yes, it's here or no, it's not here or does it tell you a range of concentration. And I think we all want to understand that. I don't want to write that down

That's familiarization with what we're doing

But it needs to be understood so when an inspector comes out there he knows what to expect that if your test said X what it means about that waste stream. So he has the opportunity to make his assessment and say -- because he is going to rely on your professional judgment in everything that you do out there, but he needs to be able to say, hey, this says, if it says X then it is this waste and if it didn't say X it's not, then you made the wrong call.

What are your expectations as far as it's there or not or a range of concentrations?

I think without going into the analysis methods and the sampling methods themselves in detail I think Ecology more clearly we've agreed to this type of approach which is a field screening approach and get quick turnaround time on it. It's not detailed. It's intended to be qualitative. The paper says it's this; you run the test to determine if that indeed what it is.

Question: I don't know how much an impact it is and I'm not that familiar with this condition, but I notice that in the condition it says we're trying to confirm designation. I don't know if that matters. I mean, are we really concerned, okay flash point limit is 140, maybe all we really care about is it above or below 140, not whether it's 120 or 100 kind of thing. There's maybe some metals analysis that well, if it shows that it doesn't change the designation are we as concerned as just that the instruments aren't compatible.

Answer: We're concerned about we can store it appropriately and they've given us the information that we need to store it appropriately. I think that's what we're talking about rather than injecting designation. This goes in the flammable storage area or not.

Right. From a practical point what we're trying to do is if you're managing it correctly. But it says you're confirming designation, you're not verifying lab equipment or something like that. So I think at a bare minimum we would be concerned if the verification sampling would change the designation.

That would obviously be significant to us.

And when we start getting stream and disposal facilities on line remember these are two final status storage facilities, you might want to require other types of verification as appropriate for that activity. What we're doing here

III.1.A.

is saying I want to put it in the south side of the building or north side of the building and I want to make sure I keep incompatibles separated

But you're doing it for more than that. You're going to ship this to an off-site facility. They need designation before you do that.

We don't get credit for that and those kinds of profiles and verifications are done by that TSD for those so we've got a double hit here on that.

For the off site paper you take the paper that was sent to you and put it on new paper

That's right. The point is we send off new profiles for waste going to the TSDs so they're doing there own verification in their own manner that's appropriate for their permit.

They have their own off-site verification for their own permit.

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: The incorporated portions of the 616 NRDWSF Permit Application are enforceable.

III.1.A.

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III.1.B.a.

Permit Condition (Sept. 94): **III.1.B. AMENDMENTS TO THE APPROVED PERMIT APPLICATION**
 III.1.B.a. Changed Text

Page 2-7, line 25. The words "can be" are changed to "shall be."

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Compatible waste with incompatible paperwork will be stored in the east end receiving area while discrepancies are resolved.

III.1.B.a.

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III.1.B.b.

Permit Condition (Sept. 94): III.1.B.b. Changed Text

Page 2-16, line 45. An additional bullet is added to the text which reads as follows: "In addition, all reporting requirements identified in Conditions I.E.15. through I.E.22. of this Permit shall be complied with."

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: The 616 NRDWSF will comply with all reporting requirements identified in Sections I.E.15 through I.E.22 of the Permit.

III.1.B.b.

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III.1.B.c.

Permit Condition (Sept. 94): III.1.B.c. Changed Text

Page 2-17, line 24. The word "voluntarily" is deleted from the text.

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Onsite waste tracking forms are used for transporting waste on the Hanford Facility.

III.1.B.c.

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III.1.B.d.

Permit Condition (Sept. 94): III.1.B.d. Changed Text

Page 2-17, line 26. The words "information on" is changed to "requirements for."

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Permit Application Sections 2.8.1 through 2.8.3 provide requirements for receiving shipments, response to manifesting discrepancies, and provisions for nonacceptance of shipments.

III.1.B.d.

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III.1.B.e.

Permit Condition (Sept. 94): III.1.B.e. Changed Text

Page 3-6, line 44. The term "Table 3-3" is deleted and replaced with "Sections 3.2.2 through 3.2.4 and 3.2.6".

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: The minimum parameters needed for waste designation and the rationale for their selection are presented in Permit Application Sections 3.2.2 through 3.2.4 and 3.2.6.

III.1.B.e.

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III.1.B.f.

Permit Condition (Sept. 94): III.1.B.f. Changed Text

Page 3-7, lines 8-11. These lines are deleted and replaced with the following:

Prior to acceptance of wastes at 616 NRDWSF, confirmation of designation may be required by solid Waste Engineering (Section 3.2.4). The Wastes which shall undergo confirmation of designation are identified in Condition III.1.B.n. of this Permit and may be divided into two groups; those that easily yield a representative sample (Category I), and those that do not (Category II). The steps for each type are outlined below along with a description of which wastes fall into each category:

Category I. If a waste which easily yields a representative sample is received a representative sample will be taken of the waste. If more than one phase is present, each phase must be tested individually. The following field tests will be performed:

- * Reactivity - HAZCATTM oxidizer, cyanide, and sulfide tests. These tests will not be performed on materials known to be organic peroxides, ethers, and/or water reactive compounds.
- * Flashpoint/explosivity - by HAZCATTM flammability procedure B, explosive atmosphere meter¹, or a closed cup flashpoint measurement instrument¹.
- * pH - by pH meter¹ or pH paper (SW-846-9041).² This test will not be performed on non-aqueous materials.
- * Halogenated organic compounds - by Chlor-D-TectTM kits.
- * Volatile organic compounds - by photo or flame ionization tester¹, by gas chromatography with or without mass spectrometry, or by melting point and/or boiling point determination.

¹These instruments are field calibrated or checked for accuracy daily when in use.

²The pH paper must have a distinct color change every 0.5 pH unit and each batch of paper must be calibrated against certified pH buffers or by comparison with a pH meter calibrated with certified pH buffers.

If the waste meets the parameters specified in its documentation, within a 10% tolerance, confirmation of designation is complete. If it does not meet these parameters, sample and analyze the materials in accordance with WAC 173-303-110. See Table 3-4 for a list of analytical methodologies and Table 3-5 for sampling methodologies. This is considered a significant error under Section 3.2.4. Re-assess and re-designate the waste. Repackage and label as necessary or return to the generating unit.

When mathematically possible, the Permittees shall perform confirmation on an equal number of Category I and Category II containers.

Category II. If a representative sample is not easily obtained (for example, discarded machinery or shop rags) or if the waste is a labpack or discarded laboratory reagent container, the following steps will be performed:

- a. Visually verify the waste. Labpacks and combination packages must be removed from the outer container. If the waste meets the parameters

III.1.B.f.

specified in its documentation, confirmation of designation is complete. If it does not meet these parameters, proceed to the next step. This is considered a significant error under Section 3.2.4.

- b. If possible and necessary, segregate/repackage the waste for shipment in a compliant manner. If the waste is not packaged in compliance with shipping requirements, proceed to the next step.
- c. The waste must be re-designated using designation methods identified in WAC 173-303-070 through 173-303-100."

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: At least 5% confirmation of waste designations for received waste.

III.1.B.g.

Permit Condition (Sept. 94): III.1.B.g. Changed Text

Page 3-7, line 17. The following line is added: "Petitions to use an alternate test method shall be submitted in accordance with WAC 173-303-910."

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Petitions to use an alternate test method will be submitted in accordance with WAC 173-303-910.

III.1.B.g.

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III.1.B.h.

Permit Condition (Sept. 94): III.1.B.h. Changed Text

Page 3-7, line 18. The following paragraph is added: "All analytical tests performed to fulfill the requirements of Sections 3.2.4 and 4.1.1.8 (Frequency of Analysis and Removal of Liquids from Containment System, respectively) shall be performed in accordance with WAC 173-303-110. New test methods shall be used within 90 days of the effective date of the State regulations or laws that mandate the use of the test method. To ensure analytical quality control, all analyses must fulfill, at a minimum, the quality procedures specified in SW-846 Volume II."

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: All analytical test methods must conform to WAC 173-303-110.

III.1.B.h.

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III.1.B.i.

Permit Condition (Sept. 94): III.1.B.i. Changed Text

Page 3-7, line 33. The words "is adequate" are deleted and replaced with "must be adequate."

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: For sampling liquid waste in tanks or containers, the length of the liquid sampling device must be adequate to reach the bottom of the vessel, thus providing a representative sample of all phases of the waste.

III.1.B.i.

This page intentionally left blank.

III.1.B.j.

Permit Condition (Sept. 94): III.1.B.j. Changed Text

Page 3-7, line 35. The words "is performed" are deleted and replaced with "must be performed."

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: For sampling liquid waste in tanks or containers, sample analyses must be performed on each phase of the waste.

III.1.B.j.

This page intentionally left blank.

III.1.B.k.

Permit Condition (Sept. 94): III.1.B.k. Changed Text

Page 3-7, line 40. The word "representative" is inserted between the words "obtaining" and "samples."

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: For contaminated containment structures, composite sampling is performed by obtaining representative samples in random locations.

III.1.B.k.

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III.1.B.1.

Permit Condition (Sept. 94): III.1.B.1. Changed Text

Page 3-8, line 1. The following sentence is inserted before the word "Appropriate": "To ensure sample quality control, all sampling efforts must, at a minimum, be in accordance with the procedures specified in WAC 173-303-110."

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: To ensure sample quality control, all sampling efforts must, at a minimum, be in accordance with the procedures specified in WAC 173-303-110.

III.1.B.I.

This page intentionally left blank.

III.1.B.m.

Permit Condition (Sept. 94): III.1.B.m. Changed Text

Page 3-8, line 1. "Appropriate preservation" is deleted and replaced with "Appropriate packaging and preservation."

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: For all samples, appropriate packaging and preservation techniques and chain of-custody requirements specified in SW-846 are used.

III.1.B.m.

This page intentionally left blank.

III.1.B.n.

Permit Condition (Sept. 94): III.1.B.n. Changed Text

Page 3-8, line 8. The following paragraph is added:

"At least five percent (5%) of the waste containers stored at 616 NRDWSF during a Federal fiscal year (October 1 through September 30) will undergo confirmation of designation pursuant to Sections 3.2.2 and 3.2.3 (Test Methods and Sampling Methods, respectively). The number of containers to meet the five percent (5%) requirement is the average of containers for the previous three months. For example, if 200 containers are received in January, 180 in February, and 220 in March then 10 containers of inbound waste must undergo confirmation of designation in April. All generating units which ship more than twenty (20) containers through 616 NRDWSF in a fiscal year will have at least one (1) container sampled and analyzed. Containers for which there is insufficient process knowledge or analytical information to designate without sampling and analysis may not be counted as part of the five percent (5%) requirement unless there is additional confirmation of designation independent of the generator designation. The generating unit's staff shall not select the waste containers to be sampled and analyzed other than identifying containers for which insufficient information is available to designate."

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Annually perform confirmation testing and analysis on at least 5 percent of the waste containers stored at 616 NRDWSF.

III.1.B.n.

This page intentionally left blank.

III.1.B.o.

Permit Condition (Sept. 94): III.1.B.o. Changed Text

Page 3-8, line 20. Delete the first sentence of the paragraph and replace it with the following: "To be acceptable at 616 NRDWSF, samples of non-radioactive waste streams must be documented to have been sent to a laboratory for waste profiling when newly identified or whenever the process used or raw materials usage changes, and at least annually thereafter, to ensure that the waste designation assigned by the Solid Waste Engineering staff (Section 3.2) is accurate and in compliance with land ban restrictions."

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Document laboratory analysis for waste stream profiling. Determine a waste stream profile by laboratory analysis of a newly identified onsite waste stream or whenever the process used or raw materials usage changes, and at least annually thereafter.

III.1.B.o.

This page intentionally left blank.

III.1.B.p.

Permit Condition (Sept. 94): III.1.B.p. Changed Text

Page 3-8, line 29. The words "For two months" are deleted and replaced with "For the next six shipments or two months, whichever is longer, to 616 NRDWSF."

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Verification sampling and analysis of an onsite waste stream or waste determined to be improperly designated will be performed and submitted with the waste storage/disposal request for the next six shipments or for 2 months, whichever is longer.

III.1.B.p.

This page intentionally left blank.

III.1.B.q.

Permit Condition (Sept. 94): III.1.B.q. Changed Text

Page 3-8, line 32. The following line is added to the end of the paragraph:
"The laboratory verification results shall be obtained in accordance with
WAC 173-303-110."

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Laboratory verification results for waste stream will be
obtained in accordance with WAC 173-303-110.

III.1.B.g.

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III.1.B.r.

Permit Condition (Sept. 94): III.1.B.r.

[Reserved]

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: [Reserved]

III.1.B.r.

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III.1.B.s.

Permit Condition (Sept. 94): III.1.B.s. Changed Text

Page 4-5, line 4. Add the following after the word "performed": "after determination by the Building Emergency Director (BED) that implementation of the Contingency Plan pursuant to Appendix 7A is not necessary or all necessary actions in accordance with the Contingency Plan have been implemented. Either case must be recorded and signed in the TSD unit-specific operating record by the BED."

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Spills and/or releases must be recorded and signed in the TSD unit-specific operating record by the BED.

III.1.B.s.

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III.1.B.t.

Permit Condition (Sept. 94): III.1.B.t.

[Reserved]

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: [Reserved]

III.1.B.t.

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III.1.B.u.

Permit Condition (Sept. 94): III.1.B.u. Changed Text

Page 4-5, line 32. The following sentence is added: "The 616 NRDWSF staff will ensure that waste is properly packaged, labeled, marked, and stored."

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: The 616 NRDWSF staff will ensure that waste is properly packaged, labeled, marked, and stored.

III.1.B.u.

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III.1.B.v.

Permit Condition (Sept. 94): III.1.B.v. Changed Text

Page 4-5, line 46. The sentence "Wherever possible, organic free water will be used as the collection medium to minimize the generation of additional dangerous waste." is deleted.

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: For obtaining a wipe sample of a spill area, where the collection medium needs to be moistened, it is appropriate to use the solvent that the laboratory uses for analysis.

III.1.B.v.

This page intentionally left blank.

III.1.B.w.

Permit Condition (Sept. 94): III.1.B.w. Changed Text

Page 4-5, line 46. The following sentence is added after "spilled material":
"All samples taken to verify that the site of a release is clean will be obtained in accordance with the applicable standards of Section 11.1.5. et seq."

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: All samples taken to verify that the site of a release is clean will be obtained in accordance with the applicable standards of Section 11.1.5. et seq.

III.1.B.w.

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III.1.B.x.

Permit Condition (Sept. 94): III.1.B.x. Changed Text

Figure 6-2, Section 2.0, Hallway. Revise the checklist to read "Protective equipment supply present per the emergency equipment list." This equipment shall be individually inspected and documented by type, and be in adequate condition, and in the quantities listed. The revised checklist shall be submitted for approval to the Department within 30 days of the effective date of this Permit.

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: By November 28, 1994, the revised protective equipment inspection checklist will be submitted to Ecology for approval. Figure 6-2, Item 4, will read "Protective equipment supply present per the emergency equipment list."

III.1.B.x.

This page intentionally left blank.

III.1.B.y.

Permit Condition (Sept. 94): III.1.B.y. Changed Text

Page 8-28, lines 5 through 8. These lines are deleted.

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Access to the 616 NRDWSF employee training records will comply with Permit Conditions I.E.9.

III.1.B.y.

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III.1.B.z.

Permit Condition (Sept. 94): III.1.B.z. Changed Text

Chapter 11. All sampling and analyses necessary for soils underneath a contaminated concrete layer must be performed prior to removal of the overlying concrete. All soils which exceed the clean closure standards of WAC 173-303-610(2)(b) shall be managed in a manner analogous to that for contaminated surrounding soil as described in Chapter 11 of Attachment 8.

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Sample and analyze soils underneath a contaminated concrete layer before removal of the overlying concrete.

III.1.B.z.

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III.1.B.aa.

Permit Condition (Sept. 94): III.1.B.aa. Changed Text

Page 11-2, line 1. The words "In general," are deleted from the text. The "t" on "these" is capitalized to read "These".

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: The closure performance standards will be achieved by removing, to below background levels or regulatory thresholds, dangerous waste from the 616 NRDWSF and decontaminating or removing all equipment, structures, soil or other materials containing or contaminated with dangerous waste.

III.1.B.aa.

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III.1.B.bb.

Permit Condition (Sept. 94): III.1.B.bb. Changed Text

Table 11-1, page T11-1. In addition to the analyses in Table 11-1, the concrete samples shall also be analyzed for all dangerous waste constituents documented to have been spilled at the 616 NRDWSF during its operating life. These analyses shall be performed in accordance with WAC 173-303-110 including the quality assurance and quality control requirements delineated in SW-846. Action levels shall be based on the level of quantitation for each analyte. Final decisions based on health based standards shall be subject to approval or rejection by the Department.

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: In Table 11-1, the concrete samples also will be analyzed in accordance with WAC 173-303-110 and SW 846 for all dangerous waste constituents documented to have been spilled at 616 NRDWSF during its operating life. The action levels will be based on the level of quantitation for each analyte and final decisions based on health-based standards will have Ecology's approval.

III.1.B.bb.

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III.1.B.cc.

Permit Condition (Sept. 94): III.1.B.cc. Changed Text

Page 12-5, line 28. Replace the words "via line management, that the" with "via line management, when the".

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: If the 616 NRDWSF Contingency Plan is implemented, the BED will notify DOE-RL, via line management, when the 616 NRDWSF is operational and emergency cleanup is complete.

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III.1.B.dd.

Permit Condition (Sept. 94): III.1.B.dd. Changed Text

Page 12-5, line 41. The words, "outside the Hanford Facility" are deleted.

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: If the 616 NRDWSF implements its building emergency plan, the Occurrence Notification Center will make the offsite notifications.

III.1.B.dd.

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III.1.B. ee.

Permit Condition (Sept. 94): III.1.B. ee. Changed Text

Page 12-12, line 16. The last two sentences of this paragraph are deleted.

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Specific training records for 616 NRDWSF will follow the requirements of Permit Conditions I.E.9. and II.C.

III.1.B.ee.

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III.1.B.ff.

Permit Condition (Sept. 94): III.1.B.ff. Changed Text

Table 12-1 "Reports and Records." A definition of the footnote "a" is added to the bottom of the table as follows:

"^a Hanford Facility means the reports and records are available through the Facility Regulatory File index pursuant to Section 12.0. Until the index is implemented, reports and records will be available at the Facility, but not necessarily at the 616 NRDWSF.

616 NRDWSF means the reports and records are available at the 616 NRDWSF office."

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: The 616 NRDWSF reports and records that are required by the RCRA Permit will be maintained within the 616 NRDWSF Operating Record.

III.1.B.ff.

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III.1.B.gg.

Permit Condition (Sept. 94): III.1.B.gg. Changed Text

Chemical, biological, and physical analyses of the dangerous waste to be handled at 616 NRDWSF pursuant to WAC 173-303-806(4)(a), entitled "616 Nonradioactive Dangerous Waste Facility Off-Site Shipping Lists," is found in Attachment 9 of this Permit.

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Chemical, biological, and physical analyses of the dangerous waste to be handled at 616 NRDWSF pursuant to WAC 173-303-806(4)(a), is Attachment 9 of the RCRA Permit.

III.1.B.gg.

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III.1.B.hh.

Permit Condition (Sept. 94): III.1.B.hh. Changed Text

The description of procedures as referenced in Appendix 11B are provided in various sections of *Procedure Description*, January 13, 1991 (Attachment 10). The specific sections of Attachment 10 which are incorporated into the Permit are listed in Table III-1, below, by procedure. No part of Attachment 10 shall supersede any part of Attachment 8.

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: No part of Attachment 10 to the RCRA Permit will supersede any part of Attachment 8 of the RCRA Permit.

III.1.B.hh.

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III.1.B.ii.

Permit Condition (Sept. 94): III.1.B.ii. Changed Text

All instances where the emergency response number is cited as "811" shall be changed to "911."

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: "911" will be used as the emergency response number.

III.1.B.ii.

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III.1.B.jj.

Permit Condition (April 95): III.1.B.jj. Changed Text

Part A Application, page 4 of 24, lines 18 and 19. Waste Code WC01 shall be deleted and the estimated annual volume of Waste Code WC02 shall be changed to 55,000 kilograms.

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: The estimated annual volume of Waste Code WC02 shall be changed to 55,000 kilograms.

III.1.B.ii.

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III.1.B.kk.

Permit Condition (April 95): III.1.B.kk. Changed Text

Page 2-8, line 3. The following sentence shall be added: "A mechanical fork truck lift and associated safety equipment (guards, handrails, etc.) are mounted on the containment pad. Design drawings of the mechanical fork truck lift are provided in Appendix 4B."

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: A mechanical fork truck lift and associated safety equipment (guards, handrails, etc.) are mounted on the containment pad.

III.1.B.kk.

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III.1.B.II.

Permit Condition (April 95): III.1.B.11. Changed Text

Page 2-16, lines 30 and 32. The address "7601 West Clearwater, Suite 102" shall be changed to "1315 West Fourth Avenue" and the telephone number "509-46-2990" shall be changed to "509-735-7581."

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Permit Condition I.E.21 has the correct address and telephone number for Ecology's Kennewick office.

III.1.B.II.

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III.1.B.mm.

Permit Condition (April 95): III.1.B.mm. Changed Text

Page 2-18, line 38. The following bullet shall be added: "• Evidence tape from field verified waste is untampered."

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Evidence tape is untampered.

III.1.B.mm.

This page intentionally left blank.

III.1.B.nn.

Permit Condition (April 95): III.1.B.nn. Changed Text

Page 3-1, lines 12 through 14. The sentence beginning with "Nonradioactive dangerous waste . . ." shall be deleted and replaced with the following: "The 616 NRDWSF stores nonradioactive dangerous waste that is received from generating units located on the contiguous Hanford Facility and from DOE-RL owned and operated generators located on noncontiguous areas near the Hanford Facility (e.g., Federal Building and 712 Building in downtown Richland and the 3000 Area). This waste is stored at the 616 NRDWSF until it is transported to an offsite TSD facility."

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: The 616 NRDWSF stores nonradioactive dangerous waste from generating units located on the contiguous Hanford Facility and from DOE-RL owned and operated generators located on noncontiguous areas near the Hanford Facility. This waste is stored at the 616 NRDWSF until it is transported to an offsite TSD facility.

III.1.B.nn.

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III.1.B.oo.

Permit Condition (April 95): III.1.B.oo. Changed Text

Page 3-1, line 20. The term "onsite" shall be deleted and replaced with "DOE-RL owned and operated."

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: The 616 NRDWSF receives nonradioactive dangerous waste from Hanford Facility and from Hanford Facility processing, testing, maintenance, and construction activities.

III.1.B.oo.

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III.1.B.pp.

Permit Condition (April 95): III.1.B.pp. Changed Text

Page 3-1, lines 21 and 22. The sentence "Shipments are made from onsite generating units to the 616 NRDWSF." shall be deleted.

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: The 616 NRDWSF will only receive waste shipments from DOE-RL owned and operated generators.

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III.1.B.qq.

Permit Condition (April 95): III.1.B.qq. Changed Text

Page 3-1, line 22. The term "onsite" shall be deleted and replaced with "Hanford Site." On line 26, the term "generated onsite" shall be deleted.

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: The Doe-RL and Hanford Site contractors have implemented control procedures to ensure that proper waste identification, packaging, and Ecology designation are attained.

III.1.B.qq.

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III.1.B.rr.

Permit Condition (April 95): III.1.B.rr. Changed Text

Page 3-2, lines 14 and 19. The term "Onsite" shall be deleted.

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: For each waste stored at 616 NRDWSF, copies of the Hanford Facility waste tracking forms will be maintained by Solid Waste Engineering, the generating unit, and 616 NRDWSF.

III.1.B.rr.

This page intentionally left blank.

III.1.B.ss.

Permit Condition (April 95): III.1.B.ss. Changed Text

Page 3-3, lines 31 through 39. The paragraph on these lines shall be deleted.

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: The 616 NRDWSF will have a standalone WAP.

III.1.B.ss.

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III.1.B.tt.

Permit Condition (April 95): III.1.B.tt. Changed Text

Page 3-4, lines 3 and 16. The term "onsite" shall be deleted.

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: The waste coordinator is trained by Solid Waste Engineering for Hanford Facility waste tracking form requirements. Before shipment of nonradioactive dangerous waste from a Hanford Facility generating unit to the 616 NRDWSF, the waste coordinator will secure the waste in a controlled, less-than-90-day storage area.

III.1.B.tt.

This page intentionally left blank.

III.1.B.uu.

Permit Condition (April 95): III.1.B.uu. Changed Text

Page 3-5, lines 19, 36, 38, and 44. The term "onsite" shall be deleted.

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: The hazardous waste disposal analysis record provides the Hanford Facility waste tracking requirements. The waste coordinator prepares the waste and associated documentation (e.g., Hanford Facility waste tracking forms) according to the hazardous waste disposal record. Before transport, a transportation logistics representative reviews the Hanford Facility waste tracking forms and each waste package against the hazardous waste disposal analysis record to ensure U.S. Department of Transportation requirements are met. The transportation logistics representative initials the Hanford Facility waste tracking forms indicating the load is acceptable for transportation to the 616 NRDWSF.

III.1.B.uu.

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III.1.B.vv.

Permit Condition (April 95): III.1.B.vv. Changed Text

Page 3-6, lines 13, 15, 19, 23, and 24. The term "onsite" shall be deleted.

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: The transporter verifies that a transportation logistics representative has initialed the Hanford Facility waste tracking form, checks the condition of the package, and verifies that each container bears a valid radiological release (or that one release covers a set of containers). The transporter loads the vehicle, the waste coordinator signs for the generating unit, and the transporter signs the Hanford Facility waste tracking form.

At the 616 NRDWSF, nuclear operators check the Hanford Facility waste tracking form against the chemical waste disposal analysis letter to verify that the Hanford Facility waste tracking form is correct, that the transportation logistics representatives' initials and the waste coordinators' and transporters' signatures are correct.

III.1.B.vv.

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III.1.B.ww.

Permit Condition (April 95): III.1.B.ww. Changed Text

Page 3-7, line 32. The term "suction pump," shall be added after the word "device."

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Sampling equipment will include a suction pump.

III.1.B.ww.

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III.1.B.xx.

Permit Condition (April 95): III.1.B.xx. Changed Text

Page 3-8, line 8. The term "onsite" shall be deleted.

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Currently there are no Hanford Facility generating units that generate a continuous, nonradioactive dangerous waste stream for which the chemical constituents and their concentrations are not readily known from knowledge of the raw materials.

III.1.B.xx.

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III.1.B.yy.

Permit Condition (April 95): III.1.B.yy. Changed Text

Page 3-8, lines 37 through 40. The paragraph on these lines shall be deleted and replaced with the following: "All waste received at the 616 NRDWSF, as described in Section 3.1, is subject to the confirmation of designation sampling requirements described in Section 3.2. Each shipment of waste received at the 616 NRDWSF must be accompanied by accurate and complete waste tracking forms for waste received from onsite sources and uniform hazardous waste manifests for waste received from offsite sources."

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Each shipment of waste received at the 616 NRDWSF must be accompanied by accurate and complete waste tracking forms for waste received from onsite sources and uniform hazardous waste manifests for waste received from offsite sources.

III.1.B.yy.

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III.1.B.zz.

Permit Condition (April 95): III.1.B.zz. Changed Text

Page T4-2, line 31. The word "cabinet" shall be replaced with "cabinet(s)."

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: There will be more than one flammable liquid storage cabinet.

III.1.B.zz.

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III.1.B.aaa.

Permit Condition (April 95): III.1.B.aaa. Changed Text

Page T4-2, line 34. The following option shall be added: "or 34 (55 gal) 34 (30 gal) (208.2 liters) (113.6 liters) 2 Flammable liquid storage cabinets (170 gal) (1,024 liters)."

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Two flammable liquid storage cabinets can be used in a Class 1B storage cell, the total volume stored in the cell will be less than 3,400 gallons (12,870.4 liters).

III.1.B.aaa.

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III.1.B.bbb.

Permit Condition (April 95): III.1.B.bbb. Changed Text

Page APP 4B-ii. On line 12, the term "Rev. 2" shall be replaced with
"Rev. 4." At line 13, the following shall be added: "ECN 191786 (10/28/93)
ECN 176589 (11/16/93)
ECN 605639 (01/17/94)
ECN 605649 (08/01/94)"

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: ECNs will be incorporated by reference.

III.1.B.bbb.

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III.2.A.

Permit Condition (Sept. 94): III.2.A. COMPLIANCE WITH APPROVED PERMIT APPLICATION

The Permittees shall comply with all the requirements set forth in the 305-B Storage Facility Dangerous Waste Permit Application, as found in Attachment 18 including the amendments specified in Condition III.2.B. Enforceable portions of the application are listed below (All subsections, figures, and tables included in these portions are also enforceable unless stated otherwise):

Part A Application

- Section 2.1.2 The 305-B Storage Unit
- Section 2.2.1 General Requirement
- Section 2.5 Performance Standard
- Section 2.6 Buffer Monitoring Zones
- Section 2.8 Manifest System
- Chapter 3.0 Waste Characteristics
- Chapter 4.0 Process Information
- Chapter 6.0 Procedures to Prevent Hazards
- Chapter 7.0 Contingency Plan
- Chapter 8.0 Personnel Training
- Chapter 11.0 Closure and Postclosure Requirements
- Chapter 12.0 Reporting and Recordkeeping
- Section 13.8 Toxic Substances Control Act
- Section 13.9 Other Requirements
- Appendix 2A Hanford Site and 300-Area Topographic Maps, Plates 2-2 Through 2-9

Responsiveness Summary:

Workshop Synopsis (Oct. 94): Most of our (PNL) significant questions on the permit conditions relate to WAP conditions. And the feasible or actual physical ability to meet some of the conditions.

There were five different categories of analyses that were to be performed to verify or complete the fingerprint analysis that was required. These were supposed to verify the waste within ten percent of what was indicated as being in the waste matrix. However some of those tests can't perform 10 percent verification. Some of them are qualitative not quantitative. The pH measurement if we can come to some sort of agreement as to what 10 percent of a logarithmic number is that would be great. Or in the case of pH paper if we can decide some sort of limit as to plus or minus pH unit or half a pH unit, whatever works there. The volatile organic analysis was specified using an organic vapor analyzer. Unfortunately it spits out number in parts per million but won't discriminate what it's analyzing, and it's not necessarily sensitive to benzene, toluene, the other organics the way it is to methane when you calibrate it. So if you don't have the correction factor, you can't tell what you have or how much.

For the HAZCAT tests that were specified, those were spot tests and are all qualitative not quantitative so we can't get 10 percent of a yes or no. The PCB analysis that's specified is less than or greater than 50 parts per million so it's 10 percent of a go or no go kind of a number.

III.2.A.

Flash points were not excluded for inorganics, which again doesn't make a whole lot of sense to test a nitric acid mixture and see what kind of flash point we'll get.

So those were mostly issues as far as the 10 percent verification that we need to deal with.

The generic is some of the analytical methods that are specified are inappropriate.

And even if appropriate, applying a 10 percent tolerance as our acceptance?

They're inappropriate because they're not quantitative, they're qualitative. They're not a yes 20 percent, no 10 percent

I think that those are appropriate tests because we're not trying to redesignate. So qualitative and quantitative has a little less meaning here. I think the issue is how strict is Ecology going to look at 10 percent tolerances. I think my people going out and doing the verification certainly can derive some type of quantitative out of the HAZCAT kit. Doesn't come to four parts per billion. It certainly does say it's apparent there, it's strongly apparent or not apparent there. I can go back to the designation and say it's supposed to be 50 parts per million and my test was so apparent it's a good confirmation. Whether that links to 10 percent I think is the question.

When I said inappropriate I didn't mean that it was inappropriate for the use that it was being put to; it's just inappropriate to have a quantitative accuracy put on it. It's quantitative in the sense that if it's greater than the detection limit of the method it's there, and if it's less than the detection limit it's not there. So you know what the detection limit of the method is. You know you've either got more or less than that.

When you go to HAZCAT training they don't tell you. They don't readily divulge the quantitative of the HAZCAT kit

And the link here is theoretically suppose to be taking a certain percentage of your verification and taking it to the lab and getting confirmation on what it really was. And what we've done is said we've recelerated our qualitative tests and compared those with a few quantitative tests and we are confirming that our judgment in the field is correct. I think that's the way you do that now. If you don't do that then --

Yeah, I guess if you're a chemist of any kind you end up knowing that if you want to figure out where your detection limit if you set up a series of standards or whatever and see where your instrument finds it and where it doesn't. It's pretty straightforward to figure out what the cut off level is that the method can see or can't see. Takes a little lab work but it's not rocket science in the chemistry world.

I think we can cut to the chase on this pretty quickly. The 10 percent was actually added by you guys because there was -- and I assumed that was in there -- because there was concern over how much you could quantify. So we never addressed the issue one way or the other. We simply said that it had to match the parameters on the shipping papers. So I don't know what kind of detail you're getting on your shipping papers, but I don't imagine that it's some parts per billion or parts per million scale; it's probably more like 10 percent of something.

Depends on the constituents. If you're talking about the TCL, yes parts per million.

But some of these others aren't on that level of accuracy.

III.2.A.

I would agree as far as to verify the tests are functional.

I'm going to throw the 10 percent thing out on the table. We didn't ask to have that in there and we're certainly looking at this as a qualitative process not a quantitative process. It's verification that yes, this is what it says on the paper and it's not some other wild thing.

Let me speak to the 10 percent tolerance level because that was done more or less at my suggestion. The goal was if we brought in a waste that has a flash point of 124 degrees Fahrenheit, that we wouldn't have to reject the waste if it flashed at 123 or 125. We've got that level of detail available to us with the testing methods that are specified. But that's a normal variation depending on how long the waste has been stored or has been in the process of being accumulated for instance. It might vary because of the presence of 1 percent water in the waste. It can cause variations in the waste that can logically result in not getting an exact match.

And so I wanted to introduce some kind of tolerance that would allow 305-B to receive the waste even though it didn't meet the exact decimal point accuracy that was described on the disposal request form. This is also a pretty standard condition in permits that impose analytical verification on TSD units.

In my experience what they normally do is to see the range used for flash point; an identified and acceptable range when profiled, then consider the analytical variability of the method. But at 28 RCRA facilities across the United States I never saw that kind of a condition placed on the fingerprint data. Once the waste was profiled when you're bringing the stuff into the site and you're just verifying that you've received what you were told was being sent. I've never seen stringent control over waste that was originally profiled so that it had a range associated with flash point. With other tests, the qualitative test, you would determine what the detection limit was for that test the same way that Cliff described, set up a range of standards, determine which one is a hit and which isn't, and then set up 10 within that and find out if you had the possibility of false negatives and then go from there. But not to have a 10 percent control because your normal analytical variability could be, even on a quantitative analysis you figure is probably 20 percent and that would be pretty tight when you're sampling waste.

If I were at the operating unit I would consider that to be far too tight.

So it sounds to me like we have agreement from Ecology that we've overkilled ourselves.

I've filled out profiles and I'll tell you how they're done. They put such a broad range to match the broad description of materials they can receive so that there is no perturbation in the process of any kind.

But actually when you're doing flash point, you specified the restrictive method instead of specifying the standard screening method.

But the issue at hand is how strictly is Ecology going to look into your QA/QC of your verification sampling and analysis process? I think we can come to an easy answer like the pH paper, the reason that it asks for distinct pellet change every half is because that's the level of detail that we expect. So that's one I think is fairly simple, that's what we would expect if it says it's 7.5 that indeed what you show the pH to be.

Within that half unit then? So 7 to 8 type of range?

Yeah, in the half unit because there would have been to be some variability. But some of the other ones are not going to be so easily

III.2.A.

addressed. We're really going to need the information from you guys and tell us what exactly can HAZCAT do. What does it tell you to do and then we'll be able to tell you what we expect it to see. At what point are we going to say no, that is not what the paper says it is. But I don't know that we can do it right now. I don't know what you've been doing in these meetings.

I kind of have a sense that this is something that could get fixed in a UMM or in the PIG team. This is an unit manager level problem.

I think the problem is, Steve, the unit managers don't feel comfortable making these types of judgments and they defer back to Scott or someone else. So we really need, to make sure if Scott is going to answer all these kinds of questions that we get to him with these questions rather than just to any unit manager.

We need to have the compliance people buy off on it as well so when they walk out there they don't say, hey, I think you can analyze it to a greater degree of accuracy.

But I mean, the idea is put this on the next UMM agenda. You guys come to us with a proposal of what does make sense for pH or VA whatever and make up a little agreement, make a recommendation to the Permit Steering Committee.

The HAZCAT has been using 616 as well, so whatever you come back and say this is what HAZCAT can show you and here's your error tolerance or your range that it's within then that's probably, that's going to be our driver.

When I was doing fingerprint analysis at Arlington confirmation of designation consisted of the manifest paperwork. The fingerprint analysis, what are the general parameters associated with the waste, yeah, it looks like the same stuff.

So this is what we refer to in the lingo is physical verification. waste, yeah, it looks like the same stuff.

No, that's not physical.

No, a water reactivity test.

And that is the ASTM standard method if you want to modify your permit.

If the profile sheet said yeah you have cyanide you would expect the cyanide litmus paper to give you the same result.

How can we reduce Howard's concern, because it looks like it was his request that prompted this. How can we reduce your concern without going into the detail that is being objected to because that's the point here.

I think Steve already brought it up if the unit managers get together and figure out what it means and bring it to the Permit Steering Committee.

Obviously the unit managers in this case did not know what was the intention and that's what I'm saying.

When this was written there were several assumptions. One of them is this isn't as rigorous as an offsite verification process, and part of that had to do it is just junk storage. So you've got the generators near by, they're designating the waste, they're bringing it to you generally, especially here by walking across the lot with it. We don't expect it to change much on the waste so the WAP says if this is what you think it is here's the parameters you check it against. And in this case, we've gone with the field screen and that is purely qualitative analysis it says, yep, that's what it is. And we're not going to go look for all the other stuff. You're not analyzing for appendix 8 or 9 stuff. You're relying on a lot of process knowledge and the generator's designation of that waste stream and all you're doing is saying yeah, that's what it is. So that's how it was written. It was intended to be a qualitative analysis.

III.2.A.

We need to have a permit implementation guidance sheet that says essentially that and that the 10 percent is merely an indicator kind of situation.

Can you throw in a where applicable to that kind of thing?

It sounds like some of the analysis you could use that and others we won't.

Can we use that level of reasonableness; when we've got an organic we're not going to be testing it for cyanide and sulfide. If we got organics, we're not going to test flash points. Some of those things were not specifically excluded in the language

Your WAP says parameters that you're going to test, but now correct me if I'm wrong, I don't think that means you're going to go out and analyze everything. Inorganics is a good example. Why run flash test on them. It's a waste of time and money and everybody knows it.

But every once in a while you probably want to make sure you're checking the checkers.

If you get a drum that says inorganics on it and you pull it off and do this bit with it and maybe it's time to get the VOA meters out and run a flash test if you think it's necessary. But Rick's point is well made. The reason that it is done is so that the storage unit has the information they need to properly store it, and to catch the rare occasion, I hope, when the generator has mixed up its paperwork. I mean, it should be that basic, that he sat down and said yeah I got process X here; someone comes along and shuffles his paperwork and you get a drum that is clearly not what the paper says it is. That's what this is for. It's not intended to be a detailed analysis. It's a screening process to check. I mean we're only doing it on 5 percent of the waste that's coming in any way.

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: The requirements identified in Permit Condition III.2.A are enforceable.

III.2.A.

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III.2.B.a.

Permit Condition (Sept. 94): III.2.B. AMENDMENTS TO THE APPROVED PERMIT APPLICATION
III.2.B.a. Waste Manifest and Transportation Compliance

For all shipments of dangerous waste to or from this TSD unit, except for shipments which occur wholly within the 300 Area, the Permittees shall comply with Conditions II.P. and II.Q. of this Permit regarding dangerous waste shipment manifesting and transportation.

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: For all shipments of dangerous waste to or from 305-B, except for shipments that occur wholly within the 300 area, the Permittees will comply with Conditions II.P and II.Q.

III.2.B.a.

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III.2.B.b.

Permit Condition (Sept. 94): III.2.B.b. Changed Text

Page 3-5, line 41. The following text is added: "The 305-B personnel shall collect from the generating unit(s) the information pursuant to 40 CFR 268.7(a) regarding Land Disposal Restricted (LDR) wastes, the appropriate treatment standards, whether the waste meets the treatment standards, and the certification that the waste meets the treatment standards, if necessary, as well as any waste analysis data that supports the generator's determinations. If this information is not supplied by the generating unit, then the 305-B personnel shall be responsible for completion and transmittal of all subsequent information regarding LDR wastes, pursuant to 40 CFR 268.7(b). All waste streams must be re-characterized at least annually, or when generating unit and/or 305-B personnel have reason to believe the waste stream has changed, to determine compliance with LDR requirements in 40 CFR 268."

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: 305-B will collect from the generating unit information regarding Land Disposal Restricted waste, appropriate treatment standards, certification that waste meets treatment standards, and waste analysis data, if appropriate.

All waste streams must be recharacterized at least annually, or when generating unit and/or 305-B personnel have reason to believe the waste stream has changed, to determine compliance with LDR requirements in 40 CFR 268.

III.2.B.b.

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III.2.B.c.

Permit Condition (Sept. 94): III.2.B.c. Changed Text

Page 3-9, line 16. The following is added to the end of this section:
"Storage limits for all chemicals are listed in Table 4-1, page 4-18, and 4-19
(Uniform Building Code, Table numbers 9-A and 9-B). This table is
incorporated into this section by reference."

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Storage limits for all chemicals are listed in
Table 4-1, page 4-18, and 4-19 (Uniform Building Code, Table numbers 9-A and
9-B).

III.2.B.c.

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III.2.B.d.

Permit Condition (Sept. 94): III.2.B.d. Changed Text

Page 3-10, line 27. The following paragraphs are inserted into this section:

Prior to acceptance of wastes at 305-B, confirmation of designation may be required (Section 3.2.4). The Wastes which shall undergo confirmation of designation are identified in Condition III.2.B.f. of this Permit and may be divided into two groups; those that easily yield a representative sample (Category I), and those that do not (Category II). The steps for each type are outlined below along with a description of which wastes fall into each category:

Category I. If a waste which easily yields a representative sample is received a representative sample will be taken from the waste containers selected. If more than one phase is present, each phase must be tested individually. The following field tests will be performed:

- * Reactivity - HAZCATTM oxidizer, cyanide, and sulfide tests. These tests will not be performed on materials known to be organic peroxides, ethers, and/or water reactive compounds.
- * Flashpoint/explosivity - by HAZCATTM flammability procedure B, explosive atmosphere meter¹, or a closed cup flashpoint measurement instrument¹.
- * pH - by pH meter¹ or pH paper (SW-846-9041).² This test will not be performed on non-aqueous materials.
- * Halogenated organic compounds - by Chlor-D-TectTM kits.
- * Volatile organic compounds - by photo or flame ionization tester¹, by gas chromatography with or without mass spectrometry, or by melting point and/or boiling point determination.

¹These instruments are field calibrated or checked for accuracy daily when in use.

²The pH paper must have a distinct color change every 0.5 pH unit and each batch of paper must be calibrated against certified pH buffers or by comparison with a pH meter calibrated with certified pH buffers.

If the sample data observed meets the parameters specified in its documentation, within a 10% tolerance, confirmation of designation is complete and the waste may be accepted. If not, the waste is rejected and returned to the generating unit, and sampling and analysis of the waste is required to be included with a resubmitted CD/RR.

When mathematically possible, the Permittees shall perform confirmation on an equal number of Category I and Category II containers.

Category II. If a representative sample is not easily obtained (for example, discarded machinery or shop rags) or if the waste is a labpack or discarded laboratory reagent container, the following steps will be performed:

- a. Visually verify the waste. Examine each selected container to assure that it matches the data provided on the CD/RR form(s) provided to document the waste. Labpacks and combination packages must be removed from the outer container. If the waste matches the description specified

III.2.B.d.

in its documentation, confirmation of designation is complete and the waste may be accepted. If not, the waste is rejected and returned to the generating unit, and the generating unit revises and resubmits the documentation to reflect the actual contents. If necessary, the waste shall be re-designated utilizing the designation methods identified in WAC 173-303-070 through 173-303-100."

Responsiveness Summary:

Workshop Synopsis (Oct. 94): Correct the typo in III.2.B.d.

Question: Maybe the next question's a real minor one. HAZCAT flammability procedure B doesn't exist as far as the HAZCAT people are concerned, so if we follow this permit condition we don't have to do flammability testing because there is no procedure B. But that's pretty minor thing hopefully we can resolve.

Answer: So say HAZCAT flammability procedure --
They don't have a method A or B; it's just a spot check on a watch glass.
That's just a typo then?
Take the B out.
Is that stated the same way in the 616 section?
On page 54 line 11
Same thing. Missed that. Ditto for me too.
Which one was it was the typo?
Condition III.2.B.d.

On L another minor issue, mentions that samples spilled for release material will be taken in accordance with our WAP. Our WAP doesn't really address that it's all in containers. We can probably work it in spirit of our WAP, can do those samples that way.

Sampling methodology says when you're sampling liquid, you can do this; you can apply liquid in the sump or liquid puddling up outside the door

The issue may be if the material has to be. The implication would be that the material has to be containerized before we can sample in accordance with the WAP; otherwise we need to put together a special set of sampling and analysis procedures like we talked about yesterday for that. So I think what we're saying is we'd like to use the WAP rather than create a new set of plans. But even if it only takes one sheet of paper handwritten, but we'd still like to use the other, but unless it's containerized there may be some compatibility problems.

Seems to me if you have a spill you're going to end up putting that in your spill log or operating record, I think you could note any deviations from your WAP right there

That's a good approach.

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Confirmation of waste designation is required. Waste is divided into two general groups: waste that easily yields a representative

III.2.B.d.

sample; and waste that does not. Steps for each type of waste are outlined in the reference requirement identifier.

Explosive atmosphere meters, closed cup flashpoint measurement instruments, pH meters, and flame ionization testers are field calibrated daily.

III.2.B.d.

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III.2.B.e.

Permit Condition (Sept. 94): III.2.B.e. Changed Text

Page 3-10, line 32. The following is added to the end of this section:
"Wastes must be analyzed using the TCLP in accordance with Appendix II of 40 CFR 261, as amended, in order to provide sufficient information for proper management and for decisions regarding Land Disposal Restrictions pursuant to 40 CFR 268."

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Waste must be analyzed using the TCLP in accordance with Appendix II of 40 CFR 261, as amended, to provide sufficient information for proper management and for decisions regarding LDR.

III.2.B.e.

This page intentionally left blank.

III.2.B.f.

Permit Condition (Sept. 94): III.2.B.f. Changed Text

Page 3-16, lines 24-28. Replace the existing language with:

"At least five percent (5%) of the waste containers received at 305-B during a Federal fiscal year (October 1 through September 30) will undergo confirmation of designation pursuant to Sections 3.2.2 and 3.2.3 (Test Methods and Sampling Methods, respectively). The number of containers needed to meet the 5% requirement is 5% of the average of containers for the previous three months. For example if 200 containers are received in January, 180 in February, and 220 in March, then 10 containers of received waste must undergo confirmation of designation in April. All generating units which ship more than twenty (20) containers through 305-B in a fiscal year will have at least one (1) container sampled and analyzed. Containers for which there is insufficient process knowledge or analytical information to designate without sampling and analysis may not be counted as part of the five percent requirement unless there is additional confirmation of designation independent of the generator designation. The generating unit's staff shall not select the waste containers to be sampled and analyzed other than identifying containers for which insufficient information is available to designate.

Containers of the following are exempt from the confirmation calculation above: Laboratory reagents or other unused products such as paint, lubricants, solvent, or cleaning products, whether received for redistribution, recycling, or as waste. To qualify for this exemption, such materials must be received at 305-B in their original containers."

Responsiveness Summary:

Workshop Synopsis: 10 percent tolerance is overkill. Use the manufacturer's normal analytical variability (i.e., an identified and acceptable range. UM managers and UMM to clarify. PSC to finalize.

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: At least 5% of the waste containers received annually (October 1 through September 30) will undergo confirmation of designation pursuant to Permit Application Sections 3.2.2 and 3.2.3. Containers for which there is insufficient process knowledge or analytical information to designate without sampling and analysis may not be counted as part of the 5% requirement unless there is additional confirmation.

III.2.B.f.

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III.2.B.g.

Permit Condition (Sept. 94): III.2.B.g. Changed Text

Page 4-1, line 30. "and -630" is added after "WAC 173-303-190" in this sentence.

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Unit operations personnel have the authority to determine whether a container is in poor condition or inadequate for storage, using the criteria of WAC 173-303-190 and -630 and professional judgment; and whether the packaging could leak during handling, storage, and/or disposal.

III.2.B.g.

This page intentionally left blank.

III.2.B.h.

Permit Condition (Sept. 94): III.2.B.h. Changed Text

Page 4-1, line 45. Added to the end of this section is the following sentence: "Containers utilized for off-site shipment shall also comply with WAC 173-303-190(2) and (3). 305-B personnel shall comply with WAC 173-303-190(4)."

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Containers used for offsite shipment will also comply with WAC 173-303-190(2) and (3). The 305-B personnel will comply with WAC 173-303-190(4).

III.2.B.h.

This page intentionally left blank.

III.2.B.i.

Permit Condition (Sept. 94): III.2.B.i. Changed Text

Page 4-24, line 21. The following paragraph is added to the end of Section 4.1.1.8.: "Verification sampling shall be carried out in accordance with Section 11.1.4.4. (Methods for sampling and testing to demonstrate success of decontamination)."

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Verification sampling will be carried out in accordance with Permit Application Section 11.1.4.4.

III.2.B.i.

This page intentionally left blank.

III.2.B.j.

Permit Condition (Sept. 94): III.2.B.j. Changed Text

Page 7-3, line 1. This line is deleted.

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: [Correction of typographical error; redundant text is deleted.]

III.2.B.j.

This page intentionally left blank.

III.2.B.k.

Permit Condition (Sept. 94): III.2.B.k. Changed Text

Page 7-3, line 28. The following is added to the end of this Section: "The names and work phone numbers of the 305-B Emergency Coordinator(s) shall be submitted to Ecology and the Agency and kept at the Single Point contact and with the contingency plan at the 305-B Unit."

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: The names and telework phone numbers of the Emergency Coordinator(s) will be submitted to Ecology and the EPA, and kept at the single point contact and with the contingency plan at the 305-B unit.

III.2.B.k.

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III.2.B.1.

Permit Condition (Sept. 94): III.2.B.1. Changed Text

Page 7-6, line 2. The following is added to this Section: "Samples of spilled or released material(s) shall be taken in accordance with the WAP found in Section 3.2."

Responsiveness Summary:

Workshop Synopsis (Oct. 94): Note any deviations of the WAP (spills) in the operating log.

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Samples of spilled or released material(s) will be taken in accordance with the WAP.

III.2.B.I.

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III.2.B.m.

Permit Condition (Sept. 94): III.2.B.m. Changed Text

Page 7-13, line 46. Added to the end of the second to last sentence is the following: "pursuant to WAC 173-303-360(2)(j)."

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Pursuant to WAC 173-303-360(2)(j), notification to terminate the emergency status will be made through the DOE-RL to state and local authorities.

III.2.B.m.

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III.2.B.n.

Permit Condition (Sept. 94): III.2.B.n. Changed Text

Page 7-23, line 35. The following bullet is added to this Section: "All local police and fire departments, hospitals, and State and local response teams that may be called upon to provide emergency services."

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: All local police, fire departments, hospitals, and state and local response teams could be called upon to provide emergency services.

III.2.B.n.

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III.2.B.o.

Permit Condition (Sept. 94): III.2.B.o. Changed Text

Page 8-2, line 28. The "I"s are replaced by "B"s on this line, changing the training frequency for Hazardous Waste Shipment Certification from initially to biennially.

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: The training frequency for hazardous waste shipment certification will be biennially.

III.2.B.o.

This page intentionally left blank.

III.2.B.p.

Permit Condition (Sept. 94): III.2.B.p. Changed Text

Page 8-2, line 30. A "B⁴" is inserted replacing the "N" under the vertical column for TS (Waste Management Technicians and Technical Specialists), requiring that they receive Radioactive Material Shipping Representative training biennially. Footnote 4 shall be changed to read: "Required for staff directly responsible for radioactive material shipments."

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Waste management technicians and technical specialists will require radioactive material shipping representative training biennially.

III.2.B.p.

This page intentionally left blank.

III.2.B.q.

Permit Condition (Sept. 94): III.2.B.q. Changed Text

Page 11-1, line 44. Added to the end of this Section is the following: "Spill reports and logs shall be consulted to determine potential areas of contamination."

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: To determine additional sampling locations, spill reports and logs will be consulted to determine potential areas of contamination.

III.2.B.q.

This page intentionally left blank.

III.2.B.r.

Permit Condition (Sept. 94): III.2.B.r. Changed Text

Page 11-3, line 51. Prior to the words "will also be performed.", the following is added: "or areas of documented spills or releases."

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Biased sampling of building equipment and structures in areas more likely to have been contaminated by unit operations, such as cracks or seams in the concrete floor or any visible stains or areas of documented spills or releases, also will be performed.

III.2.B.r.

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III.2.B.s.

Permit Condition (Sept. 94): III.2.B.s. Changed Text

Page 11-8, lines 4 and 7. The following language is inserted after the words Low-Level Radioactive on line 4 and Nonregulated on line 7, respectively, replacing the current language: "Shall be handled in accordance with the Liquid Effluent Consent Order (No. DE 91NM-177) and Milestone M-17 of the Hanford Federal Facility Agreement and Consent Order."

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Low-level radioactive waste discharged to the 300 Area liquid radioactive waste system will be handled in accordance with the Liquid Effluent Consent Order (No. DE 91NM-177) and Milestone M-17 of the FFACO.

Nonregulated waste discharged to the 300 Area process sewer system will be handled in accordance with the Liquid Effluent Consent Order (No. DE 91NM-177) and Milestone M-17.

III.2.B.s.

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III.2.B.t.

Permit Condition (Sept. 94): III.2.B.t. Changed Text

Page 11-8, line 25. Prior to the words "...will also be performed", the following is added: "or areas of documented spills or releases".

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Biased sampling to demonstrate success of decontamination in areas more likely to have been contaminated by unit operations, such as cracks or seams in the concrete floor or any visible stains or areas of documented spills or releases, also will be performed.

III.2.B.t.

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III.2.B.u.

Permit Condition (Sept. 94): III.2.B.u. Changed Text

Page 11-13, line 39. The words "annually during closure activities" are deleted from the end of this sentence and replaced with: "in accordance with Condition II.H.1." of this Permit.

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: By October 31 each year, the Permittee will submit an updated projection of anticipated costs for closure and postclosure reflecting cost updates as of September 30 of the past fiscal year, in accordance with Permit Condition II.H.1.

III.2.B.u.

This page intentionally left blank.

III.2.B.v.

Permit Condition (Sept. 94): III.2.B.v. Changed Text

Page 12-1, lines 7-9. The sentence beginning "Many of the records..." is deleted.

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Reports and records of the 305-B accepted waste will be maintained in the 305-B operating record.

III.2.B.v.

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III.2.B.w.

Permit Condition (Sept. 94): III.2.B.w.

[Reserved]

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: [Reserved]

III.2.B.w.

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III.2.B.x.

Permit Condition (Sept. 94): III.2.B.x. Text Changes

Page 12-10, line 37. Added to the end of this sentence is the following: "and Condition I.E.15. of the Facility Wide Permit."

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: The DOE-RL immediately will notify Ecology of all spills and discharges of hazardous materials (unless permitted) in accordance with WAC 173-303-145(2) and Permit Condition I.E.15.

III.2.B.x.

This page intentionally left blank.

III.2.B.y.

Permit Condition (Sept. 94): III.2.B.y.

[Reserved]

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: [Reserved]

III.2.B.y.

This page intentionally left blank.

III.2.B.z.

Permit Condition (Sept. 94): III.2.B.z.

[Reserved]

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: [Reserved]

III.2.B.z.

This page intentionally left blank.

III.2.B.aa.

Permit Condition (Sept. 94): III.2.B.aa. Text Changes

Page 13-2, line 42. This sentence is deleted and replaced with the following:
"Wastes containing polychlorinated biphenyls (PCB), which are subject to regulation under the Toxic Substances Control Act (TSCA), are stored in the 305-B Storage Unit. These wastes are stored for periods less than one (1) year before shipment to a disposal facility permitted under TSCA. Storage of PCB wastes in 305-B for periods less than one (1) year will continue to be done in compliance with applicable TSCA regulations in 40 CFR Part 761."

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: The PCB waste subject to regulation under TSCA are stored for periods less than 1 year in accordance with 40 CFR Part 761.

III.2.B.aa.

This page intentionally left blank.

III.2.B.bb.

Permit Condition (April 95): III.2.B.bb. Changed Text

Part A Application, Page 3Q of 5, lines 10 and 11. Waste Code WC01 shall be deleted and the estimated annual volume of Waste Code WC02 shall be changed to 2,000 kilograms.

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: The estimated annual volume of Waste Code WC02 shall be changed to 2,000 kilograms.

III.2.B.bb.

This page intentionally left blank.

III.2.B.cc.

Permit Condition (April 95): III.2.B.cc. Changed Text

Page 2-15, lines 30 and 31. The term "1988" shall be changed to "1991."

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Reference to Uniform Fire Code updated to 1991.

III.2.B.cc.

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III.2.B.dd.

Permit Condition (April 95): III.2.B.dd. Changed Text

Page 4-17, lines 23-36. The text on these lines shall be deleted and replaced with the following: "4.1.1.6.11 RMW Storage Area. Radioactive mixed waste that is not flammable per UFC (i.e., flash point above 100 degrees F) is stored in a special area in the basement of 305-B. For additional segregation capability, there are six small chemical storage cabinets and four 5 ft. X 5 ft. stainless steel "container pans" with 12 in. sides. The containment pans are mounted to the floor or wall of the cell to provide segregated storage for potentially incompatible mixed waste streams. Drums stored in this area are stored on pallets to prevent potential contact with spilled waste in containment during an emergency. A diagram of this area is provided in Figure 4-9."

In normal use, the storage capacity of this area is limited by the radionuclide limits imposed by the DOE for "low inventory facilities." These limitations are defined in DOE-STD-1027-92, Hazard Characterization and Accident Analysis Techniques for Compliance with DOE Order 5480.23, Nuclear Safety Analysis Reports, and are included in the radiation work permit for the mixed waste storage area."

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: RMW storage area is limited by the radionuclide limits imposed by the DOE for "low inventory facilities".

III.2.B.dd.

This page intentionally left blank.

III.2.B.ee.

Permit Condition (April 95): III.2.B.ee. Changed Text

Page 6-1, lines 46-52. The paragraph beginning with the word "Access" shall be deleted.

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Surveillance of the area will be as currently maintained in the 300 Area.

III.2.B.ee.

This page intentionally left blank.

III.2.B.ff.

Permit Condition (April 95): III.2.B.ff. Changed Text

Page 6-3, lines 15-18. The first two sentences of this paragraph shall be deleted.

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Entry to 305-B will be as currently maintained in the 300 Area.

III.2.B.ff.

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III.2.B.gg.

Permit Condition (April 95): III.2.B.gg. Changed Text

Page 6-16, lines 15-19. The first five bullets shall be deleted and replaced with the following: "• 6 sets of chemically resistant suits, aprons, boots, and gloves."

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Personnel protection equipment will be available.

III.2.B.gg.

This page intentionally left blank.

III.2.B.hh.

Permit Condition (April 95): III.2.B.hh. Changed Text

Page 7-17, lines 5-9. The first five bullets shall be deleted and replaced with the following: "• 6 sets of chemically resistant suits, aprons, boots, and gloves."

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Personnel protection equipment will be maintained for both routine and emergency operators.

III.2.B.hh.

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III.2.B.ii.

Permit Condition (April 95): III.2.B.ii. Changed Text

Page 8-3, line 24. The following shall be added to the text: "Equivalent training may be taken in place of the training identified in Figure 8-1 with approval from the 305-B Unit Operating Supervisor or the Waste Management Section Manager. Documentation of the training substitution will be placed in the operating record (within seven (7) days after the training was received) accompanied by a narrative explanation, and the date of the training. The documentation shall be made available to the Department or EPA during inspections for assessment. If the Department or EPA determines that the training substitution was not equivalent to the original, the original training will be taken or an acceptable substitution will be found."

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Documentation of the training substitution will be placed in the operating record (within seven (7) days after the training was received) accompanied by a narrative explanation, and the date of the training. If the Department or EPA determines that the training substitution was not equivalent to the original, the original training will be taken or an acceptable substitution will be found."

III.2.B.ii.

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IV.

Permit Condition (Sept. 94): IV. CORRECTIVE ACTIONS FOR PAST PRACTICES

The HSWA Permit is issued by the Agency in conjunction with this Permit. Upon delegation of the Corrective Action requirements of the HSWA by the Agency to the Department, the Permit shall be modified to incorporate the specific requirements of the HSWA Permit into this Permit. This modification shall be considered a Class 3 modification in accordance with Condition I.C.3. Until this modification is complete, compliance with the terms of the referenced provisions, shall be deemed as compliance with WAC 173-303-646.

Responsiveness Summary:

Workshop Synopsis (Oct. 94): Part IV doesn't have any real conditions, so actually the appeal from U.S. Ecology really doesn't have any impact on how you're going to do business on the Hanford Facility.

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Permittees are in compliance with WAC 173-303-646, until HSWA authority is given by the Agency to Ecology, and Ecology incorporates HSWA requirements into the HF RCRA Permit as a Class 3 Permit Modification.

IV.

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V.1.A.

**Permit Condition (Sept. 94): V.1. 183-H Solar Evaporation Basin
V.1.A. COMPLIANCE WITH APPROVED CLOSURE PLAN**

The 183-H Solar Evaporation Basins (Basins) comprise an inactive TSD unit that is currently undergoing permanent closure activities. This TSD unit was operated as an evaporation treatment unit for dangerous wastes. This Chapter sets forth the closure requirements for this TSD unit.

The Permittees shall comply with all requirements set forth in the *183-H Solar Evaporation Basins Closure Plan/Postclosure Plan (Plan)*, found in Attachment 11, including the amendments specified in Condition V.1.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 I.	General Closure Requirements, Introduction (Pages I-1 through I-6)
Section I.A-1.	Minimize Need for Post-Closure Maintenance and Controls
Section I.A-2.	Minimize Post-Closure Escape of Dangerous Waste
Section I.B.	Content of Closure Plan
Section I.C.	Certification of Closure, Survey Plat, Notice in Deed, and Financial Requirements
Section II.B-1.	Preliminary Cover Design
Section III.A-1.	Inspection Plan
Section III.A-2g.	Monitoring Plan Proposed to be Conducted Until Issuance of Final Status Post-Closure Permit
Section III.A-3.	Maintenance Plan
Section III.B.	Personnel Training
Section III.C.	Procedures to Prevent Hazards
Section III.D.	Post-Closure Contact
Section III.E.	Amendment of Post-Closure Plan
Section III.F.	Certification of Completion of Post-Closure Care
Appendix A	Topographical Maps
Appendix L	Procedures for Sample Collection, Chain of Custody, and Field Measurements
Appendix M	Analytical Methods and Quality Control Procedures
Appendix N	Personnel Training for Closure Activities

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: The requirements of Permit Condition V.1.A. are enforceable.

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V.1.B.a.

**Permit Condition (Sept. 94): V.1.B. AMENDMENTS TO THE APPROVED CLOSURE PLAN
V.1.B.a. Text Changes**

Page I-1, lines 9-12. The sentence found here is deleted and replaced with the following: "Additionally, the 183-H Basins will be closed in accordance with the most current version of all applicable environmental regulations and laws as well as the FFACO. New or modified regulations and laws may require closure activities and/or the closure plan to be modified."

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Additionally, the 183-H Basins will be closed in accordance with the most current version of all applicable environmental regulations and laws as well as the FFACO. New or modified regulations and laws may require closure activities and/or the closure plan to be modified.

V.1.B.a.

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V.1.B.b.

Permit Condition (Sept. 94): V.1.B.b. Text Changes

Page I-108, line 46. The reference to WAC 173-303-700 is deleted.

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: If Ecology agrees that removal of dangerous waste residues and contaminated soil is not appropriate, the 183-H Basins are expected to be closed as a landfill in accordance with WAC 173-303-665.

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V.1.B.c.

Permit Condition (Sept. 94): V.1.B.c. Text Changes

Page I-150, line 53. The date of "October 1991" is deleted and replaced with "the first October after the effective date of this Permit".

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Projections of anticipated closure costs will be provided annually during the closure activities (October 1996).

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V.1.B.d.

Permit Condition (Sept. 94): V.1.B.d. Text Changes

Page III-77, line 5. The phone number (509) 376-5411 is changed to (509) 375-4647.

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: The telephone number for the DOE-RL Director of the Environmental Restoration Division is (509) 375-4647.

V.1.B.d.

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V.1.B.e.

Permit Condition (Sept. 94): V.1.B.e. Text Changes

A copy of any Unusual Occurrence Report or Off Normal Occurrence Report issued after approval of the Plan which is directly related to Basin closure shall be provided to the Department's Basin unit manager within seven (7) days after issuance. This does not relieve the Permittees from any other reporting requirements specified in Part I or II of this Permit.

Responsiveness Summary: The Department is requiring the submittal of UOR's and ONR's through WAC 173-303-390 (Facility Reporting). The Department believes that the information contained in these reports will sometimes provide valuable information for regulatory compliance assessment. Since the only activity occurring at this unit is closure, each UOR and ONR needs the Department's assessment.

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Provide Ecology copies of Occurrence Reports within 7 days after issuance.

V.1.B.e.

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V.1.B.f.

Permit Condition (Sept. 94): V.1.B.f. Text Changes

Annual closure cost estimates shall be provided to the Department as described in Section I.C.4. of this closure plan and Condition II.H.1. of this Permit.

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Provide annual closure cost estimates to Ecology.

V.1.B.f.

This page intentionally left blank.

V.1.B.g.

Permit Condition (Sept. 94): V.1.B.g. Closure Notification

A written notification that closure has begun and will be conducted in accordance with the Plan, including these conditions to the Plan, shall be submitted to the Department within 30 days after the Plan is approved through issuance of this Permit.

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Provide Ecology a written notification that closure began within 30 days after the plan is approved by issue of the RCRA Permit.

V.1.B.g.

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V.1.B.h.

Permit Condition (Sept. 94): V.1.B.h. Concrete Sampling

Concrete sampling and analysis activities (basin and background sampling) shall be conducted as described within the Plan and as augmented by the Decommissioning Work Plan (DWP) entitled "Concrete Sampling - 183-H Solar Evaporation Basins" (DWP-H-080-00001) as found in Attachment 12 of this Permit.

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Conduct concrete sampling and analysis per the closure plan and the decommissioning work plan.

V.1.B.h.

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V.1.B.i.

Permit Condition (Sept. 94): V.1.B.i. Soil Sampling

Soil sampling and analyses activities (including Phases I and II, berm and background sampling) shall be conducted as described within the Plan and as augmented by DWP-H-080-00005 entitled "Core Drill Sampling - 183-H Solar Evaporation Basins (Phase I)"; WHC-SD-EN-AP-056 entitled "183-H Solar Evaporation Basins Vadose Zone Sampling Plan"; and DWP-H-026-00008 entitled "Berm Removal For 183-H Solar Evaporation Basins" as found in Attachments 13, 14, and 15, respectively, of this Permit.

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Soil sampling and analysis will be conducted per the Closure Plan, DWP-H-080-00005, "Core Drill Sampling - 183-H Solar Evaporation Basins," WHC-SD-EN-AP-056, "183-H Solar Evaporation Basins Vadose Zone Sampling Plan," and DWP-H-026-00008, "Berm Removal for 183-H Solar Evaporation Basins."

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V.1.B.j.

Permit Condition (Sept. 94): V.1.B.j. Concrete Sampling Report Submittal

The results of Basin concrete sampling (including background sampling) shall be received by the Department within 180 days of the effective date of this Permit. This submittal shall include the raw analytical data, a summary of analytical results, a data validation package, and a narrative summary with conclusions.

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: By March 27, 1995, provide Ecology the results of concrete sampling.

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V.1.B.k.

Permit Condition (Sept. 94): V.1.B.k. Soil Sampling Report Submittal

The results of Basin soil sampling (including Phases I and II, berm and background sampling) shall be received by the Department within 180 days of the effective date of this Permit. This submittal shall include the raw analytical data, a summary of analytical results, a data validation package, and a narrative summary with conclusions.

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: By March 27, 1995, provide the results of soil sampling.

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V.1.B.I.

Permit Condition (Sept. 94): V.1.B.1. Future Sampling Requirements

The Department shall be provided, for review and approval, a sampling plan and the date of sampling for any sampling event not addressed above which provides data used to support Basin closure activities at least 30 days prior to initiating actual sampling activities. This condition applies to, but is not limited to, equipment and non-concrete structural sampling and verification sampling. The results of this sampling shall be submitted to the Department. These submittals shall include the raw analytical data, a summary of analytical results, a data validation package, and a narrative summary with conclusions.

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Provide Ecology, for review and approval, a sampling plan for any sampling event not addressed in the closure plan at least 30 days before initiating sampling activities. Provide the results of sampling to Ecology.

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V.1.B.m.

Permit Condition (Sept. 94): V.1.B.m. Closure Option Notification

The Permittees shall submit to the Department, for approval, a notification indicating which closure option identified in Condition II.K. of this Permit will be utilized for the Basins. This notification shall be submitted at least 60 days prior to implementation of the option and shall be accompanied by the technical and regulatory justification for choosing the closure option along with any supporting documentation including, if necessary, the result of sampling per Conditions V.1.B.h. through V.1.B.l. This notification shall also be accompanied by a revised Figure I.B-20 of the Plan indicating a new closure schedule; however, the date of final closure shall not exceed eighteen (18) months after the effective date of this Permit. Implementation of the option cannot commence until receipt of the Department's written approval for the closure option.

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Provide to Ecology for approval, a sampling plan which closure option will be used at least 60 days before implementation. By April 29, 1996 complete closure of the 183-H Basins.

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V.1.B.n.

Permit Condition (Sept. 94): V.1.B.n. Closure Certification

Regardless of the option chosen from Condition II.K., the Permittees and the independent, registered, professional engineer certifications of closure shall be prepared and submitted to the Department within 60 days of closure as described in Section I.C-1. of the closure plan.

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: By June 27, 1996, provide to Ecology a copy of certification of closure.

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V.1.B.o.

Permit Condition (Sept. 94): V.1.B.o. Landfill Closure Requirements

If a landfill closure is chosen, the definitive design documents, construction specifications, construction drawings, and construction quality assurance plans for any engineered system (including a final cover system) shall be submitted to the Department pursuant to Condition I.C.3.

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: If a landfill closure is chosen, provide Ecology the design and QA documentation per Permit Condition I.C.3.

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V.1.B.p.

Permit Condition (Sept. 94): V.1.B.p. Landfill Closure - Regulator Protocol

After review of the documents identified in Condition V.1.B.o., the Department may issue a unit-specific Construction Inspection Plan (CIP). If the Department chooses to issue a CIP, the Department shall be provided with all submittals and notifications required by the CIP and within the time period identified in the CIP.

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Provide Ecology with the documents required by the Landfill CIP if required.

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V.1.B.q.

Permit Condition (Sept. 94): V.1.B.q. Landfill Closure Adverse Performance Notification

If a landfill closure is chosen, notification of any of the following occurrences shall be provided to the Department within 30 days of observance until a postclosure permit is issued: settlement/sedimentation in the final cover greater than one (1) foot; actual vegetative cover canopy on the final cover less than 50 percent (50%) of a typical Hanford cover canopy six (6) months after closure; erosion of the final cover greater than six (6) inches; tampering or damage to wells or well heads. The notification must include the extent and cause of the occurrence as well as actions taken (or to be taken) to mitigate the occurrence.

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: If a landfill closure is chosen, notify Ecology within 30 days of observance of settlement, damage, or erosion of the cover until the postclosure permit is issued.

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V.1.B.r.

Permit Condition (Sept. 94): V.1.B.r. Modified Closure Process

If a modified closure is chosen, the Permittees shall request any reduction of landfill requirements identified in the Plan pursuant to Condition I.C.3. This request shall be based upon the quantity and concentration of contamination which will remain in place, and shall meet the requirements of Condition II.K.3.

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: If a modified closure is chosen, request any reduction of landfill requirements identified in the Plan per Permit Condition I.C.3.

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V.1.B.s.

Permit Condition (Sept. 94): V.1.B.s. Survey Plat Submittal

If a modified closure or landfill closure is chosen, a survey plat shall be prepared and submitted to the Department, and the Benton County Planning Department no later than 60 days after certification of closure as described in Section I.C-2. of the Plan.

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: If a modified closure or landfill closure is chosen, a survey plat will be prepared and submitted to Ecology and the Benton County Planning Department no later than 60 days after certification of closure.

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V.1.B.t.

Permit Condition (Sept. 94): V.1.B.t. "Notice in Deed" Submittal

If a modified closure or a landfill closure is chosen, a notice on the deed to the property shall be prepared and submitted to the Auditor of Benton County no later than 60 days after certification of closure as described in Section I.C-3. of the Plan. No later than 30 days after submitting this notice, a certification signed by the Permittees must be submitted to the Department that the notification has been recorded along with a copy of the notice itself.

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: If a modified closure or landfill closure is chosen, submit by August 27, 1996, to the Auditor of Benton County a Notice in Deed, and by September 26, 1996, submit to Ecology a certification that the Notice in Deed was submitted.

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V.1.B.u.

Permit Condition (Sept. 94): V.1.B.u. Post Closure Permit Application

If a modified closure or landfill closure is chosen, a revision to the "Final Status Postclosure Permit Application, 183-H Solar Evaporation Basins" (June 1988), shall be submitted pursuant to Condition I.C.3. within 12 months of the Department's approval of the closure option.

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: If a modified closure or landfill closure is chosen, submit a revision to the Final Status Postclosure Permit Application within 12 months of Ecology's approval of the closure option.

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V.1.B.v.

Permit Condition (Sept. 94): V.1.B.v. Groundwater Monitoring Reports

Quarterly and annual ground water monitoring reports for the wells specified in the Plan shall continue to be submitted to the Department until clean closure is acknowledged by the Department in writing or as specified otherwise in a Basin postclosure permit.

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Submit to Ecology quarterly and annual groundwater monitoring reports until clean closure is acknowledged.

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V.2.A.

Permit Condition (Sept. 94): V.2. 300 Area Solvent Evaporator
V.2.A. COMPLIANCE WITH THE APPROVED CLOSURE
PLAN

The 300 Area Solvent Evaporator (300 ASE) is an inactive treatment unit which is currently undergoing permanent closure activities. This TSD unit was operated as an evaporation treatment unit for dangerous wastes. This Chapter sets forth the closure requirements for this TSD unit.

The Permittees shall comply with all the requirements set forth in the 300 Area Solvent Evaporator Closure Plan (Plan), as found in Attachment 16, including the amendments specified in Condition V.2.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 1.1.1	Location and General Description
Section 1.1.2	The 300-Area Solvent Evaporator
Section 1.2	Security Information
Chapter 2.0	Closure Performance Activities
Chapter 3.0	Description of Closure Activities
Chapter 4.0	Certification of Closure
Chapter 5.0	Post-closure
Chapter 6.0	Procedures to Prevent Hazards
Chapter 7.0	Contingency Plan
Chapter 8.0	Personnel Training
Section 9.8	Other Requirements
Appendix E	Soil and Concrete Sampling and Analysis Plan for the 300 Area Solvent Evaporator

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: The requirements identified in Permit Condition V.2.A. are enforceable.

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V.3.A.

Permit Condition (Sept. 94): V.3. 2727-S Nonradioactive Dangerous Waste Storage Facility
V.3.A. COMPLIANCE WITH THE APPROVED CLOSURE PLAN

The 2727-S Nonradioactive Dangerous Waste Storage Facility (2727-S) is an inactive storage unit which is currently undergoing permanent closure activities. This TSD unit was operated as a storage unit for dangerous wastes. This Chapter sets forth the closure requirements for this TSD unit.

The Permittees shall comply with all the requirements set forth in the 2727-S Nonradioactive Dangerous Waste Storage Facility Closure Plan (Plan), as found in Attachment 17, including the amendments specified in Condition V.3.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 1.1 Location Information
Section 1.2 Security
Section 1.3 Facility Description and Operations
Chapter 2.0 Closure Performance Standard
Chapter 4.0 Closure Activities
Chapter 5.0 Contingency Plan
Chapter 6.0 Training Requirements
Chapter 7.0 Closure Plan Schedule
Appendix F Sampling and Handling Procedures
Appendix G Quality Assurance Project Plan
Appendix H Personnel Training
Appendix I Certification Statements

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: The requirements of the Permit Condition V.3.A. are enforceable.

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V.4.A.

Permit Condition (April 95): V.4. Simulated High Level Waste Slurry
Treatment and Storage Unit

V.4.A. COMPLIANCE WITH APPROVED CLOSURE PLAN

The Simulated High Level Waste Slurry Treatment and Storage Unit (SHLWS) is an inactive storage and treatment unit which is currently undergoing permanent closure activities. This TSD unit was operated as a storage and treatment unit for simulated slurry as a test operation in connection with the grout project. This Chapter sets forth the closure requirements for this TSD unit.

The Permittees shall comply with all the requirements set forth in the *SHLWS Closure Plan* (Plan), as found in Attachment 19, including the amendments specified in Condition V.4.B. Enforceable portions of the Plan are listed below (all subsections, figures, and tables included in these portions are also enforceable unless stated otherwise):

Section 1.2	Part A Permit Application
Section 2.3	Description of the SHLWS T/S Unit/Physiography
Section 2.4	Location Information
Section 3.1	Characteristics of Untreated Waste
Section 3.2	Characteristics of Treated Waste
Section 6.1	General Closure Requirements
Section 6.2	General Post-Closure Requirements
Section 6.3	Closure of Chemical, Physical, and Biological Treatment Units
Appendix A	Sampling and Analysis Plan
Appendix B	Quality Assurance Project Plan

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: The requirements identified in Permit Condition V.4.A. are enforceable.

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V.5.A.

Permit Condition (April 95): V.5. 218-E-8 Borrow Pit Demolition Site

V.5.A. COMPLIANCE WITH APPROVED CLOSURE PLAN

The 218-E-8 Borrow Pit Demolition Site (218 BPDS) 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.

The permittees shall comply with all the requirements set forth in the *218-E-8 Borrow Pit Demolition Site Closure Plan* (Plan), as found in Attachment 20, 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 218-E-8 Borrow 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 218-E-8 Borrow Pit Demolition Site
Appendix 7B	Training Course Descriptions
Appendix 7C	Sampling and Analysis Plan

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: The requirements identified in Permit Condition V.5.A. are enforceable.

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V.6.A.

Permit Condition (April 95): V.6. 200 West Area Ash Pit Demolition Site

V.6.A. COMPLIANCE WITH APPROVED CLOSURE PLAN

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.

The permittees shall comply with all the requirements set forth in the *218-E-8 Borrow 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

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: The requirements identified in Permit Condition V.6.A. are enforceable.

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V.7.A.

Permit Condition (April 95): V.7. 2101-M Pond

**V.7.A. COMPLIANCE WITH APPROVED CLOSURE
PLAN**

The 2101-M Pond is undergoing permanent closure activities. This unit was operated as a disposal unit for potentially dangerous waste. This chapter sets for the closure requirements for this TSD unit.

The Permittees shall comply with all requirements set forth in the *2101-M Pond Closure Plan* (Plan), found in Attachment 22, including the amendments specified in Condition V.7.B. Enforceable portions of the Plan are listed below (all subsections, figures, and tables included in these portions are also enforceable):

Appendix A-1	Part A Permit Application, Form 3
Section I-3	2101-M Pond Location and General Description
Section I-5	Security
Chapter A	Closure Performance Standards
Chapter B	Content of Closure Plan
Chapter C	Certification of Closure

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: The requirements identified in Permit Condition V.7.A. are enforceable.

V.7.A.

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V.8.A.

Permit Condition (April 95): V.8. 216-B-3 Expansion Ponds

**V.8.A. COMPLIANCE WITH APPROVED CLOSURE
PLAN**

The 216-B-3 Expansion Ponds is undergoing permanent closure activities. This unit was operated as a treatment and disposal unit for dangerous waste. This chapter sets forth the closure requirements for this TSD unit.

The Permittees shall comply with all requirements set forth in the *216-B-3 Expansion Ponds Closure Plan* (Plan), found in Attachment 23, including the amendments specified in Condition V.8.B. Enforceable portions of the Plan are listed below (all subsection, figures, and tables included in these portions are also enforceable):

Part A Permit Application

Section 1.2	Closure Strategy
Chapter 2.0	Facility Description and Location Information
Chapter 5.0	Groundwater Monitoring
Chapter 6.0	Closure Performance Standards
Chapter 7.0	Closure Activities
Chapter 8.0	Postclosure Plan

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: The requirements identified in Permit Condition V.8.A. are enforceable.

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V.9.A.

Permit Condition (August 95): V.9.

**Hanford Patrol Academy Demolition
Sites**

**V.9.A. COMPLIANCE WITH THE APPROVED CLOSURE
PLAN**

The permittees shall comply with all the requirements set forth in the Hanford Patrol Academy Demolition Sites Closure Plan (Plan), as found in Attachment 24, including the amendments specified in condition V.9.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 Hanford Patrol Academy Demolition Sites

Section 2.24 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 Waste Inventories

**Appendix 7A Quality Assurance Project Plan for Soil Sampling and Analysis
for the Hanford Patrol Academy Demolition Sites**

Appendix 7B Training Course Descriptions

Appendix 7C Sampling and Analysis Plan

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: The requirements identified in Permit Condition V.9.A. are enforceable.

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V.10.A.

Permit Condition (August 95): V.10. 105-DR Large Sodium Fire Facility

**V.10.A. COMPLIANCE WITH THE APPROVED CLOSURE
PLAN**

The Permittees shall comply with all the requirements set forth in the Large Sodium Fire Facility Closure Plan (Plan), as found in Attachment 25, including the amendments specified in Condition V.10.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 Unit Description and Operations
Section 2.3 Security Information
Chapter 4 Waste Characteristics
Chapter 6 Closure Strategy and Performance Standards
Chapter 7 Closure Activities
Chapter 8 Postclosure
Appendix B Sampling Locations
Appendix E Quality Assurance Project Plan for Characterization and
Verification Sampling at the Large Sodium Fire Facility

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: The requirements identified in Permit Condition V.10.A. are enforceable.

V.10.A.

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V.10.B.a.

**Permit Condition (August 95): V.10.B. AMENDMENTS TO THE APPROVED CLOSURE
PLAN**

V.10.B.a. Closure Notification

If closure activities have not begun and/or will not be conducted in accordance with the Plan, including these unit specific Conditions to the Plan, a written notification shall be submitted to the Department within 30 days after the Plan is approved.

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: By September 28, 1995, provide Ecology notification that closure has begun.

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V.10.B.b.

Permit Condition (August 95): V.10.B.b. Sample Results Submittal

The results of all sampling required by this Plan shall be 'provided to the Department. This submittal shall include the raw analytical data, a summary of analytical results, a data validation package, and a narrative summary of conclusions.

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Provide the results of all sampling to Ecology including the raw analytical package, a summary of analytical results, a data validation package, and a summary.

V.10.B.b.

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V.10.B.c.

Permit Condition (August 95): V.10.B.c. Future Sampling Plans

The Department shall be provided, for review and approval, a sampling plan and the date of sampling for any sampling event not addressed in the Plan which provides data used to support LSFF cleanup activities at least 30 days prior to initiating actual sampling activities. The results of this sampling shall be submitted to the Department. These submittals shall include the raw analytical data, a summary of analytical results, a data validation package, and a narrative summary of conclusions.

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Provide Ecology a sampling plan for review and approval for any sampling event not addressed in the plan at least 30 days before initiating the sampling event.

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V.10.B.d.

Permit Condition (August 95): V.10.B.d. Action Level Exceedances

The Permittees shall notify the Department, in writing, if the action levels cited in Section 6.1.1 of the Plan cannot be achieved. The notification shall include either a request for the Department's approval of alternative action levels or identify the interim measures to be taken in the LSFF until closure activities are performed in conjunction with the 100-DR-20 operable Unit.

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: Notify Ecology in writing if the closure plan's action levels are exceeded.

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V.10.B.e.

Permit Condition (August 95): V.10.B.e. Closure Certification

The Permittees and the independent, registered, professional engineer certifications of closure shall be prepared and submitted to the Department by registered mail with/n 60 days of closure, as described in Section 7.9 of the Plan. The Permittees shall continue to address LSFF as a dangerous waste management unit until receipt of the Department's written notification that LSFF is accepted as closed.

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: By May 27, 1996, submit to Ecology certification of closure. Continue to manage the 105-DR Large Sodium Fire Facility as a dangerous waste unit until receipt of Ecology's written notification of clean closure acceptance.

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V.10.B.f.

Permit Condition (August 95): V.10.B.f. Closure Deadline

The Permittees shall complete LSFF closure activities within 240 days after the effective date of Revision 2 of this Permit.

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: By March 26, 1996, complete closure of 105-DR Large Sodium Fire Facility.

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V.11.A.

Permit Condition (August 95): V.11. 304 Concretion Facility

**V.11.A. COMPLIANCE WITH THE APPROVED
CLOSURE PLAN**

The Permittees shall comply with all the requirements set forth in the 304 Concretion Facility Closure Plan (Plan), as found in Attachment 26, including the amendments specified in Condition V.2.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 2.1 Description of the 304 Concretion Facility
Section 2.3 Security
Chapter 4 Waste Characteristics
Chapter 6 Closure Strategy and Performance Standards
Chapter 7 Closure Activities
Chapter 8 Postclosure
Appendix B Random Sampling Locations
Appendix E Personnel Training
Appendix F Quality Assurance Project Plan for Sampling and Analysis for
the 304 Concretion Facility Closure Activities
Appendix G Phase I Sampling and Analysis Plan for the 304 Concretion
Facility Closure Activities

Responsiveness Summary:

Workshop Synopsis:

Inspection Guidance:

Permittee (ID) Guidance:

Requirement Summary: The requirements identified in Permit Condition V.11.A. are enforceable.

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