

**INTEGRATED DISPOSAL FACILITY
ADDENDUM I
INSPECTION PLAN
CHANGE CONTROL LOG**

Change Control Logs ensure that changes to this unit are performed in a methodical, controlled, coordinated, and transparent manner. Each unit addendum will have its own change control log with a modification history table. The “**Modification Number**” represents Ecology’s method for tracking the different versions of the permit. This log will serve as an up to date record of modifications and version history of the unit.

Modification History Table

Modification Date	Modification Number

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**INTEGRATED DISPOSAL FACILITY
ADDENDUM I
INSPECTION PLAN**

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**ADDENDUM I
INSPECTION PLAN**

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ACRONYMS

DWMU	Dangerous Waste Management Unit
IDF	Integrated Disposal Facility
LCRS	Leachate Collection and Removal System
LDS	Leak Detection System
RCRA	<i>Resource Conservation and Recovery Act of 1976</i>

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1 **I.1 INTRODUCTION**

2 This addendum describes the method(s) and schedule for inspections of the Integrated Disposal Facility
3 (IDF) dangerous waste management units (DWMUs) that comprise Operating Unit Group 11 of
4 WA7890008967, Hanford Facility Resource Conservation and Recovery Act (RCRA) Permit
5 (hereinafter referred to as the Hanford Facility RCRA Permit). The IDF provides storage, treatment, and
6 disposal of low-level and mixed waste from Hanford on-site generators. Some Hanford Site waste will be
7 sent off-site for treatment and returned to IDF for disposal. The IDF consists of four DWMUs: a storage
8 pad, a treatment pad, and two disposal cells. Drawings showing the DWMU locations within the IDF are
9 provided in Addendum A, "Part A Form."

10 In accordance with Washington Administrative Code (WAC) 173-303-806(4)(a)(v), *Final facility*
11 *permits*, WAC 173-303-320, *General inspection*, and WAC 173-303-340, *Preparedness and prevention*,
12 this inspection plan is designed to prevent malfunctions, deterioration, operator errors, and discharges
13 which may cause or lead to the release of dangerous waste constituents to the environment or otherwise
14 threaten human health. This inspection plan is designed to provide early warning of the potential for such
15 events in order to make timely corrections and/or take preventative actions.

16 The requirements in this document that address activities involving the storage, treatment, and disposal of
17 low-level and mixed waste are applicable during the active life of the IDF. The active life of the IDF is
18 the period from the initial receipt of waste at the IDF until certification of final closure WAC 173-303-
19 040, *Definitions*. Although not defined by regulation, in this addendum the pre-active life refers to the
20 facility maintenance period between construction and the start of the active life. The requirements for the
21 pre-active life of the IDF are also provided in this document.

22 This addendum, including the inspection schedule, is available electronically at the IDF operations office.

23 **I.2 GENERAL INSPECTION REQUIREMENTS**

24 Inspections within the schedule are performed by qualified personnel according to a frequency that has
25 been developed through both regulatory requirements and operating experience (Table I-1 and Table I-2).
26 For frequencies that aren't defined by specific regulatory requirements, a justification for the frequency is
27 documented and maintained in the facility operating record. During an inspection, inspectors evaluate
28 each inspection item against its associated evaluation criteria, defined in the schedule (Table I-1 and
29 Table I-2). The results of the inspections are documented in inspection logs that are dated and signed by
30 the inspector and retained in the facility operating record for at least 5 years (Section I.3).

31 This inspection plan addresses the following unit group specific items:

- 32 • Containers (including labeling).
- 33 • Waste storage pad, waste treatment pad, and areas subject to spills.
- 34 • Security equipment.
- 35 • Safety and emergency equipment.
- 36 • Landfill disposal cells.
- 37 • Monitoring equipment.
- 38 • Operating and structural equipment.

39 Management-level staff are responsible for implementation of, and training according to, the Inspection
40 Plan. These staff may include the Facility Manager, the facility Environmental Manager, Hanford Fire
41 Department personnel (if applicable), or a staff member within the respective contractor's environmental
42 group. Inspectors may be either facility operations personnel, Hanford Fire Department personnel
43 (if applicable), or personnel who have responsibilities within the respective contractor's environmental
44 group. Inspectors must have the appropriate training as outlined in Addendum G, "Personnel Training."

1 Remedies for problems revealed during inspections are determined by the operations manager.
2 Corrective actions are performed by the facility operations personnel.

3 **I.2.1 Types of Problems**

4 Inspections are conducted to detect signs of malfunction, deterioration, discharges, or other anomalies.
5 Table I-1 provides the types of problems to be noted during an inspection.

6 **I.2.2 Frequency of Inspections**

7 The items subject to inspection, the required frequency of inspections, and the respective evaluation
8 criteria, are identified in Table I-1 and Table I-2.

9 **I.3 INSPECTION LOG**

10 Inspection activities are documented on an inspection log. Problems identified by the inspector are
11 documented on the inspection log and reported to facility management for prioritization and scheduling of
12 remedial actions to minimize risks to the environment or public health (Section I.4). Also documented on
13 the inspection log is an account of spills or discharges in accordance with WAC 173-303-145, *Spill and*
14 *discharges into the environment*, and the nature of repairs or remedial actions taken.

15 Any problems or discrepancies identified and the date and nature of any repairs or remedial actions taken
16 during the inspection are recorded on the inspection log sheet and reported to the operating organizations.
17 Problems identified during the inspections are tracked, prioritized, and addressed in a timely fashion as
18 described in Section I.4.

19 A completed inspection log includes the inspector's printed first and last name, signature, and date and
20 time of the inspection. The Permittees place the required documentation into the IDF portion of the
21 Hanford facility operating record, as required by Hanford Facility RCRA Permit Condition II.I
22 WAC 173-303-380, *Facility recordkeeping*. The inspection schedule and inspection logs are maintained,
23 retained, and stored in accordance with Hanford Facility RCRA Permit Condition II.I. If an inspection log
24 cannot be located in the IDF Operating Record, substitute documentation/log will be added to the IDF
25 Operating Record that documents the missing log.

26 If an inspection was scheduled or attempted, but could not be performed or fully completed due to a
27 planned or unplanned event, then the following will occur:

- 28 • **Planned event** (e.g., planned power outage) – A reasonable attempt will be made to re-schedule
29 and complete the inspection within the identified inspection frequency.
- 30 • **Unplanned event** (e.g., Hanford Facility or local area emergency or injury; unplanned power
31 outage; unexpected or radiological conditions; work, training, or safety restrictions) – The missed
32 inspection or portions thereof that were not completed shall be documented on the relevant
33 inspection log, and if applicable, reported in the Hanford Facility Annual Noncompliance Report.

34 **I.4 SCHEDULE FOR REMEDIAL ACTION FOR PROBLEMS REVEALED**

35 In accordance with Hanford Facility RCRA Permit Condition II.O.2 [WAC 173-303-320(3)], IDF
36 personnel will remedy problems or discrepancies revealed by the inspection within a timeframe that
37 prevents hazards to human health and the environment. Problems identified during inspections are
38 categorized into three general areas and addressed accordingly. The areas include (1) imminent hazards to
39 human health and the environment, (2) problems that can be easily remedied with little or no planning,
40 and (3) maintenance items that require planning and coordination to correct:

- 1 1. When an identified problem poses an imminent risk to human health or the environment, actions
2 are taken immediately to mitigate the hazard and may include activation of the facility emergency
3 plan and the *Hanford Emergency Management Plan* (Hanford Facility RCRA Permit
4 Attachment 4), when contingency plan action levels are exceeded. Examples of problems that
5 warrant immediate action include spills, ~~as a result of the transfer of leachate to tanker trailers,~~
6 active releases of dangerous waste to the environment (e.g., a container or piping leak), and
7 failure of systems that mitigate potential releases (e.g., secondary containment system).
- 8 2. Problems and unanticipated substandard conditions identified during inspections that are easily
9 corrected (e.g., no maintenance planning required), such as label replacement or rotation of drums
10 to allow inspection, will be corrected within 24 hours of inspection or tracked until completion.
- 11 3. Other problems which cannot be easily corrected are addressed on a prioritized schedule. If a
12 deficiency is discovered during an inspection, the deficiency is recorded on the inspection log and
13 a corrective action tracking number is assigned. Actions to assess and remedy such problems are
14 allocated and a schedule for completion is determined. ~~For problems identified during Hanford
15 Fire Department inspections, the Job Control System (JCS) is used.~~

16 Inspections are completed either by using inspection logs or through a job control database. Problems
17 identified using an inspection log are noted on the inspection log and either corrected during the time of
18 the inspection or tracked on each subsequent inspection log until corrected. Problems identified using the
19 job control database are noted on the inspection form and either corrected during the time of the
20 inspection or the problem is added to the job control database to be addressed according to a remedy
21 schedule.

22 A schedule for remedying problems includes time to develop a maintenance instruction in conjunction
23 with any schedule constraints such as parts availability, fabrication, environmental and facility access
24 limitations. The time to develop a maintenance instruction is dependent upon a number of factors
25 including, nuclear, radiological, and industrial safety hazards associated with the task, complexity of the
26 task, human factors and performance considerations, skill of worker(s), and risk to the worker, public, or
27 the environment.

28 The inspection problem resolution process may include: an inspection data sheet which identifies the
29 criteria for the inspection; relaying identified problems onto an action tracking list; and development of
30 maintenance instructions for problems based on the actions tracking list. The remedies for problems
31 identified are developed using maintenance instructions and prioritized on a schedule as described.
32 Problems pending resolution, and their associated tracking number/designation, will be noted in
33 subsequent inspection logs until the remedy is complete.

34 Information from the inspection ~~problem resolution process, including the~~ log sheet and action tracking
35 list will be maintained in the Hanford Facility Operating Record (IDF portion) in accordance with the
36 Hanford Facility RCRA Permit Condition II.I.

37 **I.5 SPECIFIC INSPECTION REQUIREMENTS**

38 The following sections detail the inspections performed at the IDF. An inspection schedule is maintained,
39 as identified in Table I-1 and Table I-2, and inspections are documented on inspection logs (Section I.3).
40 Inspections that will be conducted at the IDF during the closure and post-closure periods will be added by
41 future permit modification(s).

42 **I.5.1 General Facility**

43 The IDF is inspected to ensure that general facility operating requirements are met in accordance with
44 WAC 173-303-320. Table I-1 addresses the inspection frequencies for emergency equipment and
45 security. Since IDF does not manage ignitable or reactive waste, annual inspections for separation
46 requirements do not apply, and the associated evaluation criteria are excluded from Table I-1.

1 **I.5.2 Container Inspections**

2 Container inspections take place in accordance with WAC 173-303-630(6), *Use and management of*
3 *containers*, and Table I-1. Inspections are performed on containers that are located at the storage and
4 treatment pads. Inspections of stored containers are conducted weekly to detect signs of malfunction,
5 deterioration, discharges, or other anomalies. In accordance with WAC 173-303-320, the containers will
6 be inspected daily in areas where containers are being loaded to or from vehicles prior to being placed
7 into storage. Specific items to be noted during the inspections are listed in Table I-1.

8 **I.5.3 Landfill Inspections**

9 IDF disposal cells 1 and 2 are inspected in accordance with WAC 173-303-665(4), *Landfills*,
10 requirements. The disposal cells are inspected for problems related to erosion, run-on/runoff, and wind
11 dispersal using the frequencies identified in Table I-2.

12 **I.5.3.1 Run-On and Runoff Control System**

13 A run-on control system is installed around the perimeter of the disposal cells. The system consists of a
14 berm along the outer margin of each cell that prevents run-on from entering the cell. During the pre-active
15 life, run-on control system berms are inspected quarterly and after storm events¹ for signs of deterioration,
16 malfunction, or improper operation. During the active life, the inspection frequency increases to weekly
17 plus after a storm event.

18 There is no runoff control system for the disposal cells because the cells are constructed below grade.
19 Precipitation falling on the cells is removed by either evaporation or the Leachate Collection and
20 Removal System (LCRS) (Section I.5.3.3). Therefore, a runoff control system is not needed.

21 **I.5.3.2 Wind Dispersal Control Systems**

22 Containers are kept closed at all times prior to disposal at the IDF; therefore, containerized waste is not
23 exposed to windy conditions. For uncontainerized waste (e.g., used melters, long-length equipment),
24 methods to prevent wind dispersal of dangerous waste contamination within the IDF disposal cells may
25 include stabilizing, grouting, spraying fixatives, or other methods. Backfilling is performed to cover the
26 disposed waste, reducing exposure from windy conditions within the cells. Inspections of the wind
27 dispersal control systems are achieved by inspecting the condition of the disposal cells and the integrity of
28 the backfill soil cover.

29 **I.5.3.3 Leachate Collection and Removal System**

30 The LCRS at IDF is inspected in accordance with WAC 173-303-665(4) requirements. Each disposal cell
31 has a primary and a secondary system. The purpose of the systems is to collect and remove leachate from
32 the landfill. The primary system (LCRS) provides the preferential path along which the leachate flows
33 into the primary sump. The secondary system (Leak Detection System [LDS]) provides the preferential
34 path along which fluids leaking through the primary liner system flow to the secondary sump.
35 The systems are described in detail in Addendum C, "Process Information."

36 During the pre-active life, the LCRS and LDS are inspected quarterly and after storm events for the
37 presence of liquids, and to verify that the system is functioning properly.

38 During the active life, the LCRS and LDS are inspected weekly during normal work operations to support
39 determining the action leakage rate, as defined in WAC 173-303-665(8) and described in Addendum C, is
40 not exceeded and the systems are inspected per Table I-2. In addition, flow meter readings are recorded
41 for total flow. ~~observed to verify proper function of the leachate sump pumps.~~

¹ A storm event is defined as any atmospheric disturbance with either wind gusts of 72 km (45 mi) per hour or greater or precipitation of 12 mm (0.5 in) or greater within a 24-hour period.

Table I-1 Integrated Disposal Facility Inspection Schedule

Inspection Item/Area	Frequency ^a		Types of Problems and Evaluation Criteria
	Pre-Active Life	Active Life	
General Facility			
Posted warning signs	Annually	Quarterly Annually ^b	<i>Problem:</i> Hazardous waste warning signs missing, not in proper location, not visible, or not in good condition. Check hazardous waste warning signs to ensure signs are in the proper locations, visible, and in good condition (see Addendum E, “Security,” for sign locations).
Gates	Quarterly	Daily ^{b,c}	<i>Problem:</i> Gates are inoperable. Verify primary gates are in working condition and that a working lock is present. Verify secondary gates are closed and locked.
Fencing	Annually	Quarterly Weekly	<i>Problem:</i> Damaged security fence. Verify fence is intact with no unexpected openings, including animal burrows below the fence (see Addendum E, “Security”), and check for accumulated debris (e.g., tumbleweeds).
Portable fire extinguishers	Monthly	Monthly	<i>Problem:</i> Missing fire extinguisher, deteriorated equipment, or inaccessible fire extinguisher. Ensure fire extinguishers are in proper locations, easily accessible, and that the fire extinguishers are adequately pressurized for use (i.e., gauge reading).
Particulate eyewash bottles	Not applicable	Weekly	<i>Problem:</i> Missing, expired, or used eyewash bottles or inaccessible equipment. Verify portable eyewash bottles are in proper locations, not expired or used, and easily accessible.

Table I-1 Integrated Disposal Facility Inspection Schedule

Inspection Item/Area	Frequency ^a		Types of Problems and Evaluation Criteria
	Pre-Active Life	Active Life	
Spill response kits	Monthly/ Annually	Weekly/Annually	<i>Problem:</i> Required spill response equipment/supplies missing from the spill kit. Verify weekly/monthly that spill response kits are in the proper location and custody seals are intact. If seal is broken, inventory the contents and replace any missing, expired, or damaged items. Affix seal after inventory check/restocking. Inventory annually if spill response kit has not been used and seal remains intact.
Hand-held two-way radios	Monthly	Monthly	<i>Problem:</i> Hand-held two-way radios are not operational. Batteries are expired. Ensure that IDF's hand-held two-way radios are operational and that batteries are not expired.
Container Storage – Integrated Disposal Facility Storage Pad			
Areas subject to spills (including areas being used where waste is being loaded or unloaded)	Not applicable	Daily ^d	<i>Problem:</i> Spilled or leaking containers. Inspect loading and unloading areas daily when in use, inspecting the area for leaks and spills. Initiate action to address issues identified.
Containers/container storage areas	Not applicable	Weekly ^e	<i>Problem:</i> Damaged or leaking containers and containers that are not closed. Visually inspect for leaking containers and for defective containers (e.g., metal containers that are visibly pitted or show signs of metal fatigue). Ensure that rows are not more than two containers wide and aisle spacing between rows of containers is at least 76 cm (30 in).
Container labels (i.e., dangerous waste, hazardous waste)	Not applicable	Weekly ^e	<i>Problem:</i> Labels not present, difficult to read, altered from movement, or falling off. Ensure labels are present for waste containers awaiting treatment or disposal. Assess legibility of labels, noting any impediments to visibility and off-normal condition of labels. Are labels visible and readable?

Table I-1 Integrated Disposal Facility Inspection Schedule

Inspection Item/Area	Frequency ^a		Types of Problems and Evaluation Criteria
	Pre-Active Life	Active Life	
Pad	Monthly	Weekly ^e	<p><i>Problem:</i> Cracks, gaps, or other degradation of pad. Evidence of spills or leaks.</p> <p>Visually inspect the concrete surface of the pad for evidence of significant cracks and gaps that may compromise the integrity of the pad. Verify no evidence of spills or leaks.</p>
Container Storage and Treatment – Integrated Disposal Facility Treatment Pad			
Treatment equipment (grout fittings and hoses)	Not applicable	Prior to use	<p><i>Problem:</i> Damaged or leaking equipment.</p> <p>Visually inspect equipment to ensure equipment is not damaged.</p>
Areas subject to spills (including areas being used where waste is being loaded or unloaded)	Not applicable	Daily ^d	<p><i>Problem:</i> Spilled or leaking containers.</p> <p>Inspect loading and unloading areas daily when in use, inspecting the area for leaks and spills. Initiate action to address issues identified.</p>
Containers/container storage areas	Not applicable	Weekly ^e	<p><i>Problem:</i> Damaged or leaking containers and containers that are not closed.</p> <p>Visually inspect for leaking containers and for defective containers (e.g., metal containers that are visibly pitted or show signs of metal fatigue).</p> <p>Ensure that rows are not more than two containers wide and aisle spacing between rows of containers is at least 76 cm (30 in).</p>
Container labels (i.e., dangerous waste, hazardous waste)	Not applicable	Weekly ^e	<p><i>Problem:</i> Labels not present, difficult to read, altered from movement, or falling off.</p> <p>Ensure labels are present for waste containers awaiting treatment or disposal. Assess legibility of labels, noting any impediments to visibility and off-normal condition of labels. Are labels visible and readable?</p>

Table I-1 Integrated Disposal Facility Inspection Schedule

Inspection Item/Area	Frequency ^a		Types of Problems and Evaluation Criteria
	Pre-Active Life	Active Life	
Curbing and pad	Monthly	Weekly ^e	<i>Problem:</i> Cracks, gaps, or other degradation of pad and curbs. Visually inspect the concrete surface of the pad, including curbs, for evidence of significant cracks and gaps that may compromise the integrity of the pad. Ensure that curbs and safety paint are in good condition. Verify no evidence of spills or leaks.

Note: Inspection frequencies are defined by the following: daily – once per calendar day, weekly – once per calendar week, monthly – once per calendar month, quarterly – once per calendar quarter, and annually – once per 12-month period (±30 days).

^aOnce IDF begins to receive waste, the requirements listed under the “Pre-Active Life” column are no longer applicable, and those requirements listed under the “Active Life” column become applicable.

^bInspection will continue through closure activities.

^cInspections will occur on scheduled work days, excluding Hanford Facility closure days.

^dTo implement WAC 173-303-320(2)(c), *General inspections*, “daily when in use” is defined as when activities such as handling or moving containers create a potential for a spill to occur.

^eWeekly inspection logs, prepared to meet WAC 173-303-630(6), *Use and management of containers*, are completed when waste is being managed within IDF storage areas. If the storage area is empty, “no waste in storage” or equivalent words are entered on the inspection log.

WAC = Washington Administrative Code

Table I-2 Integrated Disposal Facility Landfill Inspection Schedule

Inspection Item/Area	Frequency ^a		Evaluation Criteria
	Pre-Active Life	Active Life	
Disposal Cells 1 and 2			
General Inspection	Quarterly and after storms ^b	Weekly and after storms ^b	Verify cell entrance ramp, walls, and floor are not deteriorated or damaged. Check for the presence of liquids (e.g., ponding).
Run-On Control Systems (berms around the cells)	Quarterly and after storms ^b	Weekly and after storms ^b	Verify the system is not deteriorated, malfunctioning, or improperly operating. Check for the presence of liquids.
Wind Dispersal Control System	Quarterly and after storms ^b	Weekly and after storms ^b	Verify the system is not deteriorated, damaged, or eroded. Verify that clean interim soil covers uncontainerized waste. Verify subsidence area or sinkholes in soil cover are not observed.
Leachate Collection System			
Disposal Cell 1 & 2 LCRS Sump level 219(Y)-LH-LI-101 ^c	Quarterly and after storms ^b	Weekly ^d and after storms ^b	Monitor and record liquid levels including amount of liquid removed from the LCRS.
Disposal Cell 1 & 2 LDS Sump level 219(Y)-LH-LI-104 ^c	Quarterly and after storms ^b	Weekly ^d and after storms ^b	Monitor and record liquid levels including amount of liquid removed from the LDS.
Disposal Cell 1 & 2 Leachate flow totalizers 219(Y)-LH-FIT-202 ^c 219(Y)-LH-FIT-203 ^c 291(Y)-LH-FIT-204 ^c	Quarterly	Weekly	Monitor and record the totalizer readings from flow meters.
Disposal Cell 1 & 2 Heat Trace Temperature Probes	Monthly ^e	Weekly ^e	Verify that heat trace is working and temperature probes are indicating properly.
Disposal Cell 1 & 2 Pump Control Panel	Quarterly	Weekly	Verify that indicators are functioning properly.

Table I-2 Integrated Disposal Facility Landfill Inspection Schedule

Inspection Item/Area	Frequency ^a		Evaluation Criteria
	Pre-Active Life	Active Life	
CPB (219A & 219E)	Quarterly and after storms ^b	Weekly and after storms ^b	Verify building structure is in good condition (e.g., no significant dents, damage, or rust). Verify floor and sump is clean and dry. Verify concrete coating is in good condition (e.g., no peeling, cracking, or scaling). Verify piping, fittings, instruments, and valves are water tight (i.e., no evidence of leaks).
CPB Temperature 219(Y)-LH-TIT-219 ^c	Quarterly ^c	Weekly ^c	Monitor and record the building's internal temperature.

Note: Inspection frequencies are defined by the following: weekly – once per calendar week, monthly – once per calendar month, and quarterly – once per calendar quarter.

^aOnce a DWMU (Cell 1 or 2) begins to receive waste, the requirements listed under the “Pre-Active Life” column are no longer applicable for that cell, and those requirements listed under the “Active Life” column become applicable.

^bA storm is any atmospheric disturbance with either wind gusts of 72 km (45 mi) per hour or greater or precipitation of 12 mm (0.5 in) or greater within a 24-hour period.

^cIn Equipment Identification Numbers, (Y) = A or E. For Cell 1, replace (Y) with A. For Cell 2, replace (Y) with E.

^dWeekly inspection of the leachate collection sumps during active life meets the requirement of WAC 173-303-665(4)(b)(iii), *Landfills*.

^eThis inspection is performed from October through March while freeze protection is needed.

CPB = Crest Pad Building

LDS = Leak Detection System

LCRS = Leachate Collection and Removal System

LTB = Leachate Transfer Building

LCT = Leachate Collection Tank

1 **I.6 REFERENCES**

2 *Resource Conservation and Recovery Act of 1976*, 42 U.S.C. 6901, et seq. Available at:
3 <http://www.epa.gov/rcraonline/>.

4 WA7890008967, Hanford Facility Resource Conservation and Recovery Act Permit, as amended,
5 Washington State Department of Ecology, Richland, Washington. Available at:
6 <https://fortress.wa.gov/ecy/nwp/permitting/hdwp/rev/8c/index.html>.

7 WAC 173-303, *Dangerous Waste Regulations*, Washington Administrative Code, Olympia, Washington.
8 Available at: <http://apps.leg.wa.gov/WAC/default.aspx?cite=173-303>.

9 303-040, *Definitions*.

10 303-145, *Spills and discharges into the environment*.

11 303-320, *General inspection*.

12 303-340, *Preparedness and prevention*.

13 303-380, *Facility recordkeeping*.

14 303-630, *Use and management of containers*.

15 303-665, *Landfills*.

16 303-806, *Final facility permits*.

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