

**INTEGRATED DISPOSAL FACILITY
CHAPTER 6.0
PROCEDURES TO PREVENT HAZARDS
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

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CHAPTER 6.0
PROCEDURES TO PREVENT HAZARDS

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CHAPTER 6.0
PROCEDURES TO PREVENT HAZARDS

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18
19
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28
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30
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32
33
34
35
36
37

TABLE OF CONTENTS

6.0 PROCEDURES TO PREVENT HAZARDS 5

6.1 Security 5

6.1.1 Security Procedures and Equipment..... 5

6.1.1.1 24-Hour Surveillance System..... 5

6.1.1.2 Barrier and Means to Control Entry 5

6.1.1.3 Warning Signs 5

6.1.2 Waiver 5

6.2 Inspection Plan 5

6.2.1 General Inspection Requirements 6

6.2.1.1 Types of Problems..... 6

6.2.1.2 Frequency of Inspections 6

6.2.2 Schedule for Remedial Action for Problems Revealed..... 7

6.2.3 Specific Process or Waste Type Inspection Requirements 7

6.2.3.1 Container Inspection 7

6.2.3.2 Landfill Inspection 8

6.3 Preparedness and Prevention Requirements..... 9

6.3.1 Pre-Active Life Preparedness and Prevention..... 9

6.3.2 Equipment Requirements 9

6.3.3 Internal Communication..... 9

6.3.4 External Communications 9

6.3.5 Emergency Equipment 9

6.3.6 Water for Fire Control..... 10

6.3.7 Aisle Spacing Requirements for Off-Specification Waste..... 10

6.4 Preventive Procedures, Structures, and Equipment..... 10

6.4.1 Unloading Operations 10

6.4.2 Runoff 10

6.4.3 Water Supplies 10

6.4.4 Equipment and Power Failure 11

6.4.5 Personal Protection Equipment 11

6.5 Prevention of Reaction of Ignitable, Reactive, and Incompatible Waste..... 11

1 **FIGURE**

2 Figure 6-1 Typical Average Daily Action Leakage Rate Calculation 12

3

4 **TABLES**

5 Table 6-1 Container Storage Inspections 13

6 Table 6-2 Landfill Inspections During Pre-Active Life*** 13

7 Table 6-3 Landfill Inspections During Active Life..... 14

8

9

1 **6.0 PROCEDURES TO PREVENT HAZARDS**

2 This chapter discusses security, inspection schedules, preparedness and prevention requirements,
3 preventive procedures, structures, equipment, and prevention of reaction of ignitable, reactive, and
4 incompatible waste at the Integrated Disposal Facility (IDF). The requirements in this chapter that
5 address activities involving the receipt and disposal of dangerous waste as defined in Washington
6 Administrative Code (WAC) 173-303-040 shall be applied during the Active Life of the IDF. Active Life
7 of a facility means the period from the initial receipt of dangerous waste at the facility until the
8 department receives certification of final closure (WAC 173-303-040). The requirements of this chapter
9 that do not apply to receipt and disposal of dangerous waste as defined in WAC 173-303-040, shall be
10 implemented by the Permittees during the Pre-Active Life of IDF. Pre-Active Life is not defined in the
11 regulations, but refers to the facility maintenance period between final construction and the start of Active
12 Life.

13 The IDF is designed and will be operated to minimize exposure of the general public and operating
14 personnel to disposed waste. Shielding, contamination control, control of toxic or dangerous material,
15 and safety and security procedures will be used to keep exposure as low as reasonably achievable
16 (ALARA).

17 **6.1 Security**

18 The following sections describe the security measures, equipment, and warning signs to be used to control
19 entry to the IDF. A discussion of Hanford Facility security is provided in Attachment 3.

20 **6.1.1 Security Procedures and Equipment**

21 The following sections describe the 24-hour surveillance system, barrier, and warning signs to be used to
22 provide security and control access to the IDF.

23 **6.1.1.1 24-Hour Surveillance System**

24 The Hanford Facility is a controlled-access area (refer to Attachment 3).

25 **6.1.1.2 Barrier and Means to Control Entry**

26 Because the IDF is located within the portion of the Hanford Facility controlled by the 24-hour
27 surveillance system, WAC 173-303-310(2)(c) does not apply.

28 **6.1.1.3 Warning Signs**

29 Signs will be visible from all angles of approach, and legible from a distance of at least 7.6 meters. Each
30 active area used for disposal will be posted with a sign, in English, reading, "Danger-Unauthorized
31 Personnel Keep Out" or an equivalent legend.

32 **6.1.2 Waiver**

33 A waiver of the security procedures and equipment requirements for the IDF was not requested.
34 Therefore, the requirements of WAC 173-303-310(1)(a) and (b) are not applicable.

35 **6.2 Inspection Plan**

36 This section describes the method and schedule for inspections of the IDF. These inspections help to
37 ensure that situations do not exist that might cause or lead to the release of waste to the environment,
38 degradation of safety equipment and/or systems, or that might pose a threat to human health. Abnormal
39 conditions identified by inspections must be corrected.

1 **6.2.1 General Inspection Requirements**

2 The content and frequency of inspections are described in this section. Inspection discrepancies are
3 documented on inspection checklists and log sheets. The schedule and inspection records will be kept in
4 the inspection logbooks and retained by the IDF operations personnel. Inspection records will be retained
5 in accordance with Permit Condition II.I.1 and contain the following information:

- 6 • Date and time of inspection.
- 7 • Printed name and the hand written signature of the inspector.
- 8 • Notation of the observations made.
- 9 • An account of spills or discharges in accordance with WAC 173-303-145.
- 10 • Date and nature of any repairs or remedial actions taken.

11 The inspection checklists consist of a listing of items that are assessed during each inspection. A yes/no
12 response will be made for each listed item. A “yes” response means that the item is in compliance with
13 the conditions stated on the checklist. Any problems identified during the inspection, as indicated by a
14 “no” response on the checklist, will be reported immediately to the IDF operations supervisor.

15 **6.2.1.1 Types of Problems**

16 Types of problems looked for during an inspection in Pre-Active Life are in Table 6-2. Types of
17 problems looked for during an inspection in Active Life are in Table 6-3. Once the IDF begins to receive
18 dangerous waste, the requirements in Table 6-2 are no longer applicable. Each day mixed waste
19 containers and/or bulk waste are handled within the IDF; an operator will perform a daily inspection of
20 areas subject to spills (e.g., loading and unloading areas and waste handling areas).

21 **6.2.1.2 Frequency of Inspections**

22 Table 6-2 provides inspection frequencies during the Pre-Active Life. Tables 6-1, 6-2, and 6-3 provide
23 inspection frequencies during the Active Life. For clarification, areas with operations that may result in
24 spills are described below.

25 Each step in the waste placement operation occurs in the landfill over the double High Density
26 Polyethylene (HDPE) liner system that provides containment of any spill from the waste handling
27 operation.

28 Waste Handling Operations involve the following:

- 29 • Unloading of the waste shipment in the landfill.
- 30 • Placement of the cover soil over the waste container.

31 During Active Life, leachate¹ movement occurs within the double-contained leachate handling
32 system. There is a potential for a leachate spill on the concrete containment slab of the Crest Pad
33 Building, Leachate Transfer Building, and/or the Leachate Loading Truck Pad.

34 Leachate Handling Operations involve the following:

- 35 • Pumping leachate from the collection sumps to the Crest Pad Building.
- 36 • Activities within the Crest Pad Building.
- 37 • Transfer of leachate to and from the double-lined Leachate Tanks.
- 38 • All activities that occur in the Leachate Transfer Building.
- 39 • Pumping of leachate to a tanker truck on the Truck Loading Pad.

¹WAC 173-303-040 defines “leachate” as any liquid, including any components suspended in the liquid that has percolated through or drained from dangerous waste.

1 Liquid handling operations involve the following:

- 2 • The Secondary Leak Detection System (SLDS) is similar to the Leak Detection System (LDS),
3 except that it is equipped with liquid level indication instrumentation only. A low-capacity
4 submersible pump can be inserted into the SLDS sump if required. Pumping of liquid from the
5 collection sump to the small, portable container on the SLDS Pad may be required. Collected
6 liquid in the SLDS that may be construction water and/or liquid from other sources.

7 (Note that the SLDS is not a design requirement of WAC 173-303-665, however United States
8 Department of Energy (DOE) has added the design feature pursuant to its authority under the *Atomic*
9 *Energy Act of 1954* (AEA) and not for the purposes of compliance with the dangerous waste regulations.
10 Therefore, information regarding the design, construction, and operation of the SLDS is provided for
11 information only. Pursuant to AEA, DOE has sole and exclusive responsibility and authority to regulate
12 the source, special nuclear and by-product material component of radioactive mixed waste at DOE-owned
13 nuclear facilities. Source, special nuclear and by-product materials, as defined by AEA, are not subject to
14 regulation under Resource Conservation and Recovery Act (RCRA) or the Hazardous Waste Management
15 Act, by the State of Washington and are not be subject to State dangerous waste permit, orders, or any
16 other enforceable instrument issued there under. DOE recognizes that radionuclide data may be useful in
17 the development and confirmation of geohydrologic conceptual models. Radionuclide data contained
18 herein is therefore provided as a matter of comity so the information may be used for such purposes.)

19 **6.2.2 Schedule for Remedial Action for Problems Revealed**

20 The operating organization will remedy any problems revealed by the inspection on a schedule that
21 prevents hazards to human health and the environment. Where a hazard is imminent or already has
22 occurred immediate action will be taken. Immediate actions will be implemented based on ALARA
23 considerations, availability of supplies, equipment, and personnel.

24 **6.2.3 Specific Process or Waste Type Inspection Requirements**

25 The following sections detail the inspections to be performed at the IDF.

26 **6.2.3.1 Container Inspection**

27 On receipt, operations personnel will confirm appropriate documentation by inspecting each mixed
28 wasted container for disposal and compliance with the container receipt inspection criteria (Chapter 3.0)
29 before the mixed waste is placed in the IDF.

30 If present, off-specification waste and vitrified waste requiring cooling in storage will be subject to the
31 specific items and/or problems noted during weekly container inspection (Table 6-1) include the
32 following:

- 33 • Condition of trench floor and sides.
- 34 • Container structural integrity.
- 35 • Containers closed.
- 36 • At a minimum, 76.2 centimeters aisle spacing.
- 37 • Corrosion of containers.
- 38 • Evidence of spills or leaks.
- 39 • Container labels and markings in place, legible, and unobscured.
- 40 • Areas in and around stored waste are free of combustibles (e.g., tumbleweeds).
- 41 • Waste separations such as tape, rope, chain or other cordon mechanism are intact.

1 If present, transport vehicles containing off-specification waste or vitrified waste requiring cooling will be
2 subject to the specific items and/or problems noted during weekly inspection include the following:

- 3 • Transport vehicle structural integrity.
- 4 • At a minimum, 76.2 centimeters aisle spacing between transporters.
- 5 • Evidence of spills or leaks.
- 6 • Areas in and around transport vehicles are free of combustibles (e.g. tumbleweeds).
- 7 • Separations such as tape, rope, chain or other cordon mechanism are intact.

8 Transport vehicles will not be subject to an individual container inspection within the transporter.
9 Records of inspection will be maintained as detailed in Section 6.2.1.

10 **6.2.3.2 Landfill Inspection**

11 The IDF will be inspected according to the frequencies in Table 6-2 during Pre-Active Life and in
12 accordance with Table 6-3 during Active Life.

13 **6.2.3.2.1 Run-on and Runoff Control System**

14 A run-on control system is installed around the perimeter of each lined trench (Chapter 4.0). The system
15 consists of a berm along the outer margin of each trench that prevents run-on from entering the trench.
16 All run-on control system berms are inspected quarterly (Table 6-2) and after storms for signs of
17 deterioration, malfunction, or improper operation. During Active Life, any precipitation that falls
18 between the run-on control berm and the edge of the trench excavation eventually might flow into the
19 primary leachate control and removal system sump and will be treated as leachate.

20 **6.2.3.2.2 Leak Detection System**

21 During Pre-Active Life, the LDS will be monitored quarterly and after storms (Table 6-2) for the amount
22 of liquid removed. To calculate the action leakage rate, measurements are needed to be collected over
23 five consecutive days each quarter. The action leakage rate will be determined for the quarter using these
24 measurements collected during one five-day work week each quarter.

25 During Active Life (Table 6-3), leak detection for lined trench at the IDF is accomplished by the
26 following:

- 27 • Monitoring liquid level above the secondary liner.
- 28 • Monitoring liquid levels above primary liner.
- 29 • Inspecting for the presence of liquids after significant precipitation events.
- 30 • Verifying certain gauges and instruments are in current calibration; calibration is performed
31 annually or more frequently at intervals suggested by the manufacturer (Chapter 4.0,
32 Section 4.3.7.4).
- 33 • Recording secondary sump levels on a daily action leakage rate calculation sheet (Figure 6-1).

34 If the action leakage rate (Chapter 4.0, Appendix 4C) has not been exceeded, the liner system will be
35 functioning properly.

36 **6.2.3.2.3 Wind Dispersal Control System**

37 During Pre-Active Life, berms will be inspected quarterly and after storms to ensure the berms are
38 functioning properly (Table 6-2).

39 During Active Life (Table 6-3), waste is inspected on receipt for evidence of damage, corrosion, or
40 deterioration that might lead to dispersal of the contents.

1 Unpackaged or bulk waste with any potential for wind dispersal is covered or sprayed with fixative after
2 being placed in a trench.

3 In addition, unpackaged or bulk waste handling operations are suspended in winds exceeding
4 24 kilometers per hour unless specifically approved by operations supervisors. The supervisor only
5 would grant approval to operate in winds over 24 kilometers per hour after determining that the risk to
6 human health or the environment would be diminished by completing the work activity, or that the nature
7 and form of the waste handling activity was such that the wind speed would have no significant impact.

8 **6.2.3.2.4 Leachate Collection and Removal System**

9 During Pre-Active Life, the Leachate Collection and Removal System is inspected quarterly and after
10 storms (Table 6-2) for the presence of liquids, and that the system is functioning properly.

11 During Active Life (Table 6-3), liquids in the Leachate Collection and Removal System and LDS are
12 monitored daily to ensure the action leakage rate (Chapter 4.0, Appendix 4A) is not exceeded and will be
13 inspected per Table 6-2. In addition, a flow meter is used to check if the amount of actual leachate
14 pumped corresponds to the amount accumulated in the leachate collection tank. This check will verify
15 the proper function of the leachate collection and removal sump pumps with each use.

16 **6.3 Preparedness and Prevention Requirements**

17 Section 6.3.1 describes the preparedness and prevention measures to be implemented during Pre-Active
18 Life. Sections 6.3.2 through 6.3.7 describe the preparedness and prevention measures taken at the IDF
19 during Active Life.

20 **6.3.1 Pre-Active Life Preparedness and Prevention**

21 During Pre-Active Life, the Permittees will comply with Permit Attachment 4, *Hanford Emergency*
22 *Management Plan* (DOE/RL-94-02) as applicable for a facility that does not contain dangerous waste.
23 An emergency coordinator will be assigned to IDF who will manage and control all aspects of the initial
24 facility response when an emergency occurs.

25 **6.3.2 Equipment Requirements**

26 The following sections describe the internal and external communications systems and the emergency
27 equipment required.

28 **6.3.3 Internal Communication**

29 Immediate emergency instruction to personnel working at the IDF will be provided by cellular
30 telephones.

31 **6.3.4 External Communications**

32 Personnel at the IDF will have voice communication or equivalent (e.g., hand signals) during work
33 assignments to maintain external communications with shift supervisors. Supervision will contact the
34 Hanford Facility emergency telephone number (911) (373-3800 for cellular telephones) if assistance is
35 needed in the field.

36 **6.3.5 Emergency Equipment**

37 Emergency equipment will be available for use at the IDF. A list of equipment is included in the
38 contingency plan (Addendum J.1, Pre-Active Life, and Addendum J.2, Active Life).

39 The Hanford Facility relies primarily on the Hanford Fire Department to control fires. Emergency
40 equipment will not be located at IDF trenches. Portable fire extinguishers will be carried on IDF
41 operations vehicles. Attachment 4, *Hanford Emergency Management Plan*, (DOE/RL-94-02) identifies
42 the trained firefighting and emergency medical personnel and equipment.

1 **6.3.6 Water for Fire Control**

- 2 • Hanford Fire Department trucks as described in Permit Attachment 4, *Hanford Emergency*
3 *Management Plan*, (DOE/RL-94-02); and fire hydrants described in Addendum J.1 and
4 Addendum J.2 supply water for fire control at the IDF.

5 **6.3.7 Aisle Spacing Requirements for Off-Specification Waste**

6 Aisle spacing during off-specification and cooling vitrified waste storage operations is sufficient to allow
7 the movement of personnel and fire protection equipment in and around the containers. This aisle spacing
8 meets the requirements of WAC 173-303-340(3). Inspection aisle space must be at least 76.2 centimeters.
9 During off-specification storage operations, rows of containers are placed no more than two containers
10 wide in accordance with WAC 173-303-630(5)(c). Aisle spacing requirements will be applied to
11 transport vehicles but not to the waste within the transport vehicles.

12 **6.4 Preventive Procedures, Structures, and Equipment**

13 The following sections will apply during the Active Life for the IDF and describe preventive procedures,
14 structures, and equipment.

15 **6.4.1 Unloading Operations**

16 Methods used to prevent release of waste during unloading operations will be employed as follows.

- 17 • Waste will be inspected according to the receipt inspection criteria (Chapter 3.0).
18 • If waste fails the inspection, it will be designated as an off-specification waste and could be
19 placed in the storage area or returned to the generator.
20 • Containers and bulk waste will be handled by appropriate equipment (i.e., crane) during
21 unloading.
22 • Path from loading area to trench area will be clear of obstructions.

23 Spills will be managed as identified in the contingency plan (Addendum J.2).

24 Containers and bulk waste will be staged at the waste unloading area no longer than necessary for
25 placement into the landfill. Administrative procedures may prevent immediate unloading and backfilling
26 of waste containers. Containers might be left in the transporters as needed to resolve the administrative
27 procedure requirements or to support the operational schedule before containers are placed into the
28 landfill. The transfer vehicle containing vitrified waste requiring cooling may be temporarily placed in
29 the storage area prior to unloading for disposal.

30 **6.4.2 Runoff**

31 The waste in the IDF will be placed below the land surface; thus, the IDF is designed to prevent runoff of
32 precipitation that might have come in contact with the waste. The land surface is relatively level, so
33 trenches have only internal drainage. The minimal amounts of precipitation that accumulate are
34 contained within the trench.

35 The IDF trench is designed to channel run-on liquid away from the trench. Precipitation that percolates to
36 the bottom of the trench is captured in the leachate collection system and is managed as rainwater during
37 Pre Active Life. During Active Life, these liquids will be managed as multi-source leachate waste.

38 **6.4.3 Water Supplies**

39 The design and operation of the IDF during Active Life is intended to minimize the generation of
40 potentially contaminated leachate and to prevent leachate migration into groundwater resources in the
41 local area. All activities performed during Active Life (Chapter 4.0) or Pre-Active Life is designed to
42 protect local water supplies.

1 Activities that prevent contamination of water supplies or groundwater will include the following:

- 2 • Placement of waste in lined trenches.
- 3 • Run-on and runoff will be controlled.
- 4 • LDS will be used.
- 5 • Leachate will be collected and managed as waste.
- 6 • Inspections will be performed.
- 7 • Placement of backfill will occur after a layer of waste has been placed in the trench.

8 **6.4.4 Equipment and Power Failure**

9 Electrical power is required for the landfill. Electricity supplies power to the sump pumps used to remove
10 accumulated leachate from the primary and secondary liners. Electricity outages will be restored as soon
11 as possible. Backup equipment will be acquired if necessary to provide electrical service. Failed
12 equipment will be repaired or replaced as soon as possible.

13 **6.4.5 Personal Protection Equipment**

14 Personnel will be trained in the use of applicable personal protection equipment. The protective clothing
15 required for Active Life will vary depending on the form and content of the waste.

16 **6.5 Prevention of Reaction of Ignitable, Reactive, and Incompatible Waste**

17 The waste acceptance criteria will prohibit the disposal of ignitable, reactive, and incompatible waste at
18 the IDF. Waste acceptance criteria (Chapter 3.0) will ensure that the required treatment has been
19 performed before the waste is disposed in the IDF.

20 Waste stream compatibility (i.e., compatibility between individual waste streams and compatibility
21 between waste streams and landfill design and construction parameters) will be assessed on a
22 case-by-case basis. Criteria for assessing and determining compatibility will be identified in either the
23 facility waste acceptance criteria, Waste Analysis Plan, or other protocol or procedure as appropriate
24 (Chapter 3.0) for further discussion of waste stream compatibility.

AVERAGE DAILY ACTION LEAKAGE RATE CALCULATION

Operating Day / / Gallons
Operating Day / / Gallons
Operating Day / / Gallons
Operating Day / / Gallons
Operating Day / / Gallons
Operating Day / / Gallons
Operating Day / / Gallons

Secondary Sump Total Volume **TOTAL** Gallons

(DIVIDE TOTAL VOLUME BY 7)

AVERAGE DAILY ACTION LEAKAGE RATE: Gallons

NOTIFY IDF Operations Supervisor if Average Daily Action Leakage Rate is GREATER than XXX Gallons

Repairs or remedial action taken:

Operator's Printed Name: _____ Date _____

Operator's Signature: _____ Time _____ hrs

Operations Supervisor Printed Name: _____ Date _____

Operations Supervisor Signature: _____ Time _____ hrs

Table 6-1 Container Storage Inspections

Requirement Description	Inspection Frequency	Types of Problems
-630(6) Containers	Weekly	Leaking containers Deteriorating containers
-630(6) Containment system	Weekly	Deteriorating containment system
-395(1)(d) Ignitable or reactive waste	Not Applicable	Not Applicable

1

Table 6-2 Landfill Inspections During Pre-Active Life***

Requirement Description	Inspection Frequency	Types Of Problems
-665(4)(b)(i) Run-on and runoff control	Quarterly and after storms*	Deterioration, malfunction, or improper operation
-665(4)(b)(ii) Wind dispersal control systems	Quarterly and after storms*	Proper functioning
-665(4)(b)(iii) Leachate Collection and Removal Systems	Quarterly and after storms*	Presence of liquids; proper functioning
-665(4)(c)(i) LDS sump	Quarterly and after storms*	Amount of liquids removed
SLDS sump**	Quarterly**	Presence of unexpected liquid volume**
Security “Danger-Unauthorized Personnel Keep Out” signs	Quarterly	Signs are posted and legible
Areas subject to spills	Daily when any activities may take place that have a potential for a spill or release to occur	Evidence of spills

*A storm is any atmospheric disturbance with either wind gust of 56.3 kilometers per hour (35 miles per hour) or greater, or precipitation of 0.5 inch or greater within a 24-hour period.

**Note: SLDS is not a design requirement of WAC 173-303-665, however DOE is adding the design feature pursuant to its authority under the AEA and not for the purposes of compliance with the dangerous waste regulations. Therefore, formation regarding the design, construction, and operation of the SLDS is provided for information only. Pursuant to AEA, DOE has sole and exclusive responsibility and authority to regulate the source, special nuclear and by-product material component of radioactive mixed waste at DOE-owned nuclear facilities. Source, special nuclear and by-product materials, as defined by AEA, are not subject to regulation under RCRA or the Hazardous Waste Management Act, by the State of Washington and are not be subject to State dangerous waste permit, orders, or any other enforceable instrument issued there under. DOE recognizes that radionuclide data may be useful in the development and confirmation of geohydrologic conceptual models. Radionuclide data contained herein is therefore provided as a matter of comity so the information may be used for such purposes.

***Once the IDF begins to receive dangerous waste, the requirements in Table 6-2 are no longer applicable, and inspection requirements will be as provided in Table 6-3.

2

Table 6-3 Landfill Inspections During Active Life

Requirement Description	Inspection Frequency	Types Of Problems
-665(4)(b)(i) Run-on and runoff control	Weekly and after storms*	Deterioration, malfunction, or improper operation
-665(4)(b)(ii) Wind dispersal control systems	Weekly and after storms*	Proper functioning
-665(4)(b)(iii) Leachate Collection and Removal Systems	Weekly and after storms*	Presence of leachate; proper functioning
-665(4)(c)(i) LDS sump	Weekly and after storms*	Amount of liquids removed
SLDS sump**	Monthly**	Presence of unexpected liquid volume**
Security devices: “Danger-Unauthorized Personnel Keep Out” signs	Weekly	Signs are posted and legible
Areas subject to spills	Daily when waste management activities having a potential for a spill to occur	Evidence of spills

*A storm is any atmospheric disturbance with either wind gust of 56.3 kilometers per hour (35 miles per hour) or greater, or precipitation of 0.5 inch or greater within a 24-hour period.

**Note: SLDS is not a design requirement of WAC 173-303-665, however DOE is adding the design feature pursuant to its authority under the AEA and not for the purposes of compliance with the dangerous waste regulations. Therefore, formation regarding the design, construction, and operation of the SLDS is provided for information only. Pursuant to AEA, DOE has sole and exclusive responsibility and authority to regulate the source, special nuclear and by-product material component of radioactive mixed waste at DOE-owned nuclear facilities. Source, special nuclear and by-product materials, as defined by AEA, are not subject to regulation under RCRA or the Hazardous Waste Management Act, by the State of Washington and are not be subject to State dangerous waste permit, orders, or any other enforceable instrument issued there under. DOE recognizes that radionuclide data may be useful in the development and confirmation of geohydrologic conceptual models. Radionuclide data contained herein is therefore provided as a matter of comity so the information may be used for such purposes.