



DEPARTMENT OF
ECOLOGY
State of Washington

Response to Comments

FS-1 Outdoor Container Storage Area Closure Plan

August 3 – September 18, 2015

Summary of a public comment period and responses to comments

January 2016
Publication no. 16-05-001

PUBLICATION AND CONTACT INFORMATION

This publication is available on the Department of Ecology's (Ecology) website at <https://fortress.wa.gov/ecy/publications/SummaryPages/1605001.html>

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Response to Comments

FS-1 Outdoor Container Storage Area Closure Plan August 3 – September 18, 2015

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INTRODUCTION

The Washington Department of Ecology's Nuclear Waste Program (Ecology) manages dangerous waste within the state by writing permits to regulate its treatment, storage, and disposal.

When a new permit or a significant modification to an existing permit is proposed, Ecology holds a comment period to allow the public to review the change and provide formal feedback. (See [Washington Administrative Code \[WAC\] 173-303-830](#) for types of permit changes.)

The Response to Comments is the last step before issuing the final permit, and its purpose is to:

- *Specify which provisions, if any, of a permit will become effective upon issuance of the final permit, providing reasons for those changes.*
- *Describe and document public involvement actions.*
- *List and respond to all significant comments received during the public comment period and any related public hearings.*

This Response to Comments is prepared for:

Comment period: FS-1 Outdoor Container Storage Area, August 3 – September 18, 2015

Permit: *Hanford Facility Resource Conservation and Recovery Act (RCRA) Permit for the Treatment, Storage, and Disposal of Dangerous Waste, Part V, Closure Unit Group 4 (WA7890008967), FS-1 Outdoor Container Storage Area*

Permittees: U.S. Department of Energy, Richland Operations Office, and CH2M Hill Plateau Remediation Company.

Original issuance date: September 27, 1994

Draft effective date: February 22, 2016

To see more information related to the Hanford Site and nuclear waste in Washington, please visit our website: www.ecy.wa.gov/programs/nwp.

REASONS FOR MODIFYING THE PERMIT

On June 26, 2013, the U.S. Department of Energy (USDOE) and the U.S. Environmental Protection Agency (EPA) signed a [Consent Agreement and Final Order](#), Docket Number RCRA-10-2013-0113 (CAFO). The CAFO required the closure of several Hanford Site Dangerous Waste Management Units (DWMUs).

The FS-1 Outdoor Container Storage Area (OCSA) is part of the Hanford Facility's Solid Waste Operations Complex (SWOC), and is included in the CAFO list of DWMUs that require a closure plan.

USDOE has agreed with EPA to close the FS-1 OCSA, as it was never authorized for hazardous/dangerous waste storage. The permit modification requires a closure plan to be submitted for the FS-1 OCSA DWMU.

PUBLIC INVOLVEMENT ACTIONS

Ecology encouraged public comment on the FS-1 OCSA closure plan during a 45-day public comment period held August 3 through September 18, 2015. We took the following steps to notify and involve the public:

- *Mailed a public notice announcing the comment period to about 1,750 interested members of the public.*
- *Featured the comment period on the Hanford [Tri-Party Agreement Events calendar](#), which is posted on Ecology's website and shared with the Hanford Advisory Board.*
- *Placed a public announcement legal classified advertisement in the *Tri-City Herald* on August 2, 2015.*
- *Sent a notice announcing the start of the comment period to about 1,540 subscribers on the [Hanford-Info email list](#).*

The Hanford information repositories located in Richland, Spokane, and Seattle, Washington, and Portland, Oregon, received the following documents for public review:

- Public notice
- Transmittal letter
- Permit Conditions
- Statement of Basis for the proposed FS-1 OCSA Permit Modification
- Draft Introduction and Draft Closure Plan for the FS-1 OCSA
- Response to Comments for the CAFO DWMUs public comment period held October 30, 2013, through January 6, 2014 (Publication no. 15-05-010)
- State Environmental Policy Act (SEPA) Determination of Nonsignificance

The following public notices for this comment period are in [Appendix A](#) of this document:

1. Statement of Basis
2. Public notice (focus sheet)
3. Classified advertisement in the *Tri-City Herald*
4. Notice sent to the Hanford-Info email list

LIST OF COMMENTERS

Commenter Identification:

The table below lists the names of organizations or individuals who submitted a comment on the FS-1 OCSA closure plan Permit modification and where you can find Ecology's response to the comment(s).

Commenter	Organization	Comment Number	Page Number
<i>Jim, Russell</i>	<i>Yakama Nation</i>	1 to 53	4-27

RESPONSE TO COMMENTS

Description of Comments:

Ecology accepted comments on the FS-1 OCSA closure plan from August 3 through September 18, 2015. This section provides a summary of comments we received during the public comment period and our responses, as required by RCW 34.05.325(6)(a)(iii).

Comments are grouped by individual, and each comment is addressed separately. Ecology's responses directly follow each comment in italic font. Verbatim copies of all written comments are attached in [Appendix B](#).

Comments are sorted by the order in which they were provided. For ease of reference, Ecology numbered the comments. The comments were not numbered when they were submitted.

Comment # 1 from Russell Jim, Yakama Nation, dated September 18, 2015

[Factsheet & Focus sheet]: YN previously suggested inclusion of the required WAC 173-303-830(4)(c)(ii)(F) statement: "The permittee's compliance history during the life of the permit being modified is available from the department of ecology contact person." YN previously suggested Ecology includes active hyperlinks to referenced documents (e.g., U.S. Department of Energy U.S. Environmental Protection Agency Docket Number: RCRA-10-2013-0113 Consent Agreement and Final Order-CAFO). Neither of these was done. YN believes to have informed public comment, all relevant information or links to this information should be included in the Factsheet/Focus sheet. There is no way to verify your statements as to the alleged violation or settlement requirements. YN requests in the future, for Ecology's publication of draft permitting documents for the other RCRA units involved in the CAFO (T-Plant 271 T cage; T-Plant 211 T pad; T-Plant 221 T sand filter pad; T-Plant 221 T - R5 waste storage area; T-Plant 277T outdoor storage area; Central Waste Complex ("CWC") outside storage A; CWC outside storage area B) please make this information available for public review and understanding of issues in their entirety.

YN requests Ecology ensure all hyperlinks to referenced documents are active and the Part A form is available.

Ecology Response:

Thank you for your comment regarding inclusion of WAC 173-303-830(4)(c)(ii)(F). The suggested statement applies to the Permittee modification request comment period. The correct regulatory citation is WAC 173-303-830(8), which applies to Ecology's permit decision. As to the hyperlinks, Ecology has determined that citing reference documents (e.g., RCRA-10-2013-0113 Consent Agreement and Final Order-CAFO) is sufficient.

Ecology will provide the Part A and other information, as appropriate, in the next permit revision (Rev. 8c) as specified in the [Agreed Order and Stipulated Penalty, No. DE 10156 \(Agreed Order\)](#). The intent for FS-1 and other closing units is to not include them in Rev. 9 of the Permit.

Comment # 2 from Russell Jim, Yakama Nation, dated September 18, 2015

[General Concerns]: YN finds it somewhat alarming that this area should function as an unauthorized, non-permitted container storage area (aka illegal storage of wastes) for such a long period without Ecology's recognition. There should be no future such instances of this type of violation activities on the Hanford Site and the YN request clarification as to how this will be ensured.

Ecology Response:

Thank you for your comment. Ecology is and will continue to perform compliance inspections at the SWOC units. (Ecology staff inspected 17 operating and 8 closure and post-closure treatment, storage, or disposal unit [TSD] facilities in Federal Fiscal Year 2015, achieving 100% of the inspection goal for the year. Performance measures for inspections started on 7/1/2013.)

Comment # 3 from Russell Jim, Yakama Nation, dated September 18, 2015

[General Concerns]: WAC 173-303-806 states the requirements for final facility permit applications including Part A forms & Part B information. All this information was and remains vitally important for proper operations and/or closure of any treatment, storage, or disposal (TSD) unit under the RCRA permit, public understanding of the process of closure of a RCRA TSD unit, and protection of human health and the environment. Unfortunately, for this unit (and remaining CAFO units) none of which has been approved through the Dangerous Waste Permitting process. WAC 173-303-806(4)(b) lists the required information specific to use and management of containers/container storage areas. The unit was obviously not designed/constructed in compliance with WAC 173-303-630 requirements. YN believes this should be acknowledged and the information included in the Factsheet/Focus sheet and Closure Plan.

Ecology Response:

Thank you for your comment. Ecology will provide the Part A and Part B information, as appropriate, in the next permit revision (Rev. 8c) as specified in the Agreed Order. The intent for FS-1 and other closing units is to not include them in Rev. 9 of the Permit.

The fact sheet provides sufficient information to point out the deficiencies associated with FS-1. The fact sheet provides the following statement:

“In June 2013, the U.S. Environmental Protection Agency (EPA) issued a Consent Agreement and Final Order (CAFO) against the U.S. Department of Energy (USDOE) for violations of the Resource Conservation and Recovery Act of 1976 (RCRA) program at the Hanford Facility’s Solid Waste Operations Complex (SWOC). The EPA CAFO was based on information collected during a 2011 inspection, and other information.

The alleged violations included:

- *Storage of hazardous waste without a permit.*
- *Failure to meet closure plan requirements.*
- *Failure to submit closure notice and closure plans.*
- *Failure to comply with land disposal restriction requirements.”*

Comment # 4 from Russell Jim, Yakama Nation, dated September 18, 2015

[General Concerns]: Upon review, the simplistic approach in the Closure Plan (and the Permit Conditions) falls short of providing the required information necessary for Ecology to establish permit conditions (or maintain compliance with) the Hazardous Waste Management Act and WAC 173-303. Each permit issued under this chapter must contain terms and conditions as the director determines necessary to protect human health and the environment. YN believes there are portions of the requirements for operating units that are valuable to tailor to, and incorporate details into the closure of the FS-1. As currently written, there is approximately four pages to describe in detail Closure Activities, Personnel Training Preparedness/Contingency Planning, and Inspection Plan and procedures. One cannot credibly determine compliance with WAC 173-303-610 requirements to have a detailed, complete closure plan (which should and does not, include a specifically detailed closure activity schedule with complete removal of wastes in 180 days) given the limited details presented in this Closure Plan. All these plans should be directed towards the ongoing cleanup closure/post-closure actions (e.g., inspections should be on a weekly basis at a minimum.) YN believes and requests the Closure Plan be a standalone document with detailed Appendices to include this information

Ecology Response:

Thank you for your comment. FS-1 does not currently and will not store dangerous wastes. All future activities at FS-1 support the closure of the unit; therefore, a schedule for removal of wastes is not necessary. Inspections are not necessary at a site that does not store waste.

Ecology reviewed the closure plan, provided comments, and worked with the Permittees to complete the plan. Ecology management and the Attorney General's office have deemed the permit conditions included in the FS-1 closure plan as sufficient.

Comment # 5 from Russell Jim, Yakama Nation, dated September 18, 2015

[General Concerns]: YN notes the Closure Plan does not discuss how non-TSD unit constituents (should they be discovered during closure sampling) will be addressed through the *Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA)* past practice processes identified in the Tri-Party Agreement (Section 7.0). YN requests inclusion of this information (and potential radionuclide contaminants of concern) in the Introduction for document continuity and comprehensive public understanding of the entire system processes. YN suggests inclusion of the following could clarify concerns regarding radiological contamination in relationship to RCRA closure requirements : *Where information regarding treatment, management, and disposal of the radioactive source, byproduct material, and/or special nuclear components of mixed waste (as defined by the Atomic Energy Act of 1954, as amended) has been incorporated into this permit, it is not incorporated for the purpose of regulating the radiation hazards of such components under the authority of this permit and chapter 70.115 RCW. However, it is anticipated remedial actions for radioactive constituents shall be consistent with the closure activities required under WAC 173-303.*

Ecology Response:

Thank you for your comment. This comment is out of scope. The closure plan submitted by the Permittees is limited in scope to addressing dangerous waste and mixed dangerous waste (not the radiological components of mixed waste) constituents of potential concern (COPCs).

Neither RCRA nor the Dangerous Waste Regulations grant Ecology the authority to regulate radioactive materials, and Ecology cannot require the Permittees to address radiological COPCs

in this closure plan. The Permittees have the option of addressing the radiological components under their authority granted by the Atomic Energy Act of 1954, as amended, or under CERCLA.

Comment # 6 from Russell Jim, Yakama Nation, dated September 18, 2015

[General Concerns]: YN notes there is no discussion of Cultural Resources or any potential impacts. We recognize this is not covered under WAC 173-303 permitting requirements, yet it remains an issue for the overall site remediation. YN requests consultation regarding our concerns.

Ecology Response:

Thank you for your comment. This comment is out of scope for this closure plan.

Comment # 7 from Russell Jim, Yakama Nation, dated September 18, 2015

[General Concerns]: YN notes in the *Matter of: U.S. Department of Energy U.S. Environmental Protection Agency Docket Number: RCRA-10-2013-0113 Consent Agreement and Final Order, in settlement of the violations alleged in Part III, "Respondent shall immediately comply with all applicable final facility standards for the management of dangerous waste identified at WAC 173-303-600(1) for the units identified above in Paragraph 3.11 including, but not limited to, the following requirements: general waste analysis at WAC 173-303-300, security provisions at WAC 173-303-310, general inspections at WAC 173-303-320, personnel training at WAC 173-303-330, preparedness and prevention at WAC 173-303-340, contingency plan and emergency procedures at WAC 173-303-350, and use and management of containers at WAC 173-303-630. Respondent shall continue to comply with these requirements until closure of the units has been completed, or until the units become authorized under a permit for the treatment, storage, and or disposal of dangerous waste in which case Respondent shall comply with the applicable permit requirements."* These have not been completed as of September 2105. YN requests an explanation of the path forward into compliance for these other CAFO units.

Ecology Response:

Thank you for your comment. Ecology will provide the Part A, Part B information, and the required attachments, as appropriate, in the next permit revision (Rev. 8c) as specified in the Agreed Order. The intent for FS-1 and other closing units is to not include them in Rev. 9 of the Permit.

The Agreed Order provides the path forward to compliance for the other units.

Comment # 8 from Russell Jim, Yakama Nation, dated September 18, 2015

[HA1 Introduction]: YN questions the inclusion of Addendum H1 and requests this information be identified on a Part A form per WAC 173-303 requirements and that the Part A form be included as an Attachment to the Closure Plan.

Ecology Response:

Thank you for your comment. Addendum H1 does not exist. If the reviewer is referring to Addendum HA, it is included because it is the FS-1 Closure Plan. We question the need for the Part A to be included as an attachment to the Closure Plan. The comments specific to permit organization are out of scope.

Ecology will provide the Part A and other information, as appropriate, in the next permit revision (Rev. 8c) as specified in the Agreed Order. The intent for FS-1 and other closing units is to not include them in Rev. 9 of the Permit.

Comment # 9 from Russell Jim, Yakama Nation, dated September 18, 2015

[HA1 Introduction]: The introduction does not mention that there is environmental information related to this unit (i.e. 218-W-5; Trench 34) contained DOE/RL-2004-60, Draft B Radioactive Landfills Group Operable Unit RCRA Facility Investigation/Corrective Measures Study/Remedial Investigation/Feasibility Study Work Plan *and* groundwater data contained in the Hanford Environmental Information System (ISIS). YN requests inclusion of this information (and radionuclide contaminants of concern in the adjacent Trench 34 waste site and its groundwater unit) in the Introduction for document continuity and comprehensive public understanding of the entire RCRA LLBG disposal processes.

Ecology Response:

Thank you for your comment. This comment is out of scope. The closure plan submitted by the Permittees is limited in scope to addressing dangerous waste and mixed dangerous waste (not the radiological components of mixed waste) constituents of potential concern (COPCs).

Neither RCRA nor the Dangerous Waste Regulations grant Ecology the authority to regulate radioactive materials, and Ecology cannot require the Permittees to address radiological COPCs in this closure plan. The Permittees have the option of addressing the radiological components under their authority granted by the Atomic Energy Act of 1954, as amended, or under CERCLA.

The additional references and background materials are not necessary or required for this closure plan.

Comment # 10 from Russell Jim, Yakama Nation, dated September 18, 2015

[HA1 Introduction]: YN requests deletion of portion of line #8; *"and represents the baseline for closure and the enforceable compliance requirements for conducting closure."* Closure plans must comply with the WAC 173-303-610 requirements; closure plans do not 'simply represent a baseline for closure' as stated. WAC 173-303-610(3)(iv thru vi) requires more information and details which are not included in this document.

Ecology Response:

Thank you for your comment. The introduction section includes the statement:

"This closure plan complies with WAC 173-303-610(2) through WAC 173-303-610(6), 'Dangerous Waste Regulations,' 'Closure and Post-Closure,' and represents the baseline for closure and the enforceable compliance requirements for conducting closure."

More detailed information on the methods to be used during closure is provided in Section H-A3, Closure Activities.

The methods and steps needed to meet requirements of WAC 173-303-610(a)(iv and v) are provided in Section H-A3.7, Identifying and Managing Contaminated Environmental Media; and Section H-A3.9, Sampling and Analysis and Constituents to be Analyzed. The requirements of WAC 173-303-610(a)(vi) will not apply unless contamination is found that cannot be cleaned up.

Comment # 11 from Russell Jim, Yakama Nation, dated September 18, 2015

[Section HA1.1]: YN requests inclusion of reference citation for the radiological survey performed, maximum results, and identification of background comparison levels.

Ecology Response:

Thank you for your comment. This comment is out of scope. The closure plan submitted by the Permittees is limited in scope to addressing dangerous waste and mixed dangerous waste (not the radiological component of the mixed waste) constituents of potential concern (COPCs).

Neither RCRA nor the Dangerous Waste Regulations grant Ecology the authority to regulate radioactive materials, and Ecology cannot require the Permittees to address radiological COPCs in this closure plan. The Permittees have the option of addressing the radiological components under their authority granted by the Atomic Energy Act of 1954, as amended, or under CERCLA.

A radiological survey was performed at FS-1. However, there is no requirement for Ecology to include the survey in the closure plan. For the Permittees to provide the survey was an additional benefit, since radioactivity can be used as an indicator for the potential presence of RCRA Dangerous Waste. The results of the survey indicated no radiological contamination above expected background levels, thus providing a reasonable assumption that no mixed low-level waste containers had ever leaked.

Comment # 12 from Russell Jim, Yakama Nation, dated September 18, 2015

[Section HA1.1]: WAC 173-303-806 states the requirements for final facility permit applications including Part A forms & Part B information. YN requests that a completed Part A form be included in the Closure Plan to verify maximum waste inventory, etc. See comment above regarding Addendum H1.

Ecology Response:

Thank you for your comment. Ecology will provide the Part A and Part B information, as appropriate, in the next permit revision (Rev. 8c) as specified in the Agreed Order. The intent for FS-1 and other closing units is to not include them in Rev. 9 of the Permit.

Comment # 13 from Russell Jim, Yakama Nation, dated September 18, 2015

[Section HA1.1]: YN suggest checking calculations of total storage area to confirm 1125 yd²=966m². Edit Summary of Sampling Design table in Appendix HA.b as needed.

Ecology Response:

Thank you for your comment. Regarding the storage area calculation, your comment was noted and the area was corrected. No change to the Sampling Design is necessary based on the change in area.

Comment # 14 from Russell Jim, Yakama Nation, dated September 18, 2015

[Section HA2]: YN disagrees with statements in line #s 10 that appearance of the land should be consistent with future land-use determinations for adjacent portions of the 200 Areas as an industrial-exclusive portion of the Hanford Site. YN disagrees with leaving the gravel as it more than likely to be used inappropriately as a staging area for wastes and potential soil contamination. We request removal and revegetation of the site.

Ecology Response:

Thank you for your comment. FS-1 is adjacent to an operating mixed-waste trench (Trench 34). To prevent radioactive material from being spread by ecological vectors, the LLBGs are kept free of vegetation. Therefore, the gravel at FS-1 will remain in place and free of vegetation as long as Trenches 31 and 34 remain in operation.

Ecology is unclear what is meant by "staging area," but we presume this refers to a transfer area. There is no anticipated future use of the FS-1 area, but any use related to dangerous waste management will be in accordance with requirements of WAC 173-303.

Comment # 15 from Russell Jim, Yakama Nation, dated September 18, 2015

[Section 2.1.]: YN requests edits to line 20: YN agrees Use of MTCA Method B an unrestricted use standard is appropriate, however we disagree the statement that the "numeric cleanup levels have been calculated according to the requirements ...as of the effective date of the permit modification." Ecology should not backslide from any earlier, more stringent cleanup levels listed in earlier versions of CLARC or under the various interim records of decision for the Hanford site. YN ERWM PROGRAM and public stakeholder response has consistently requested Ecology to ensure this does not happen. YN requests Ecology use its Omnibus Authority per the WAC to ensure no lessening of cleanup standards for the closure of this unit (and subsequent units covered under the CAFO).

Ecology Response:

Thank you for your comment. WAC 173-340-702(12)(a) requires Ecology to use the cleanup levels that apply to a release based on the rules in effect at the time the department issues a final cleanup action plan for a given release.

The Model Toxic Control Act (MTCA) Method B cleanup values (Cleanup Levels and Risk Calculations [CLARC] values) being used to screen soil sampling results are based on current science and available data. The current CLARC values will be used. The use of earlier, more stringent values that have been replaced with updated values would be in violation of the regulations.

Comment # 16 from Russell Jim, Yakama Nation, dated September 18, 2015

[Section 2.1.]: YN requests the Permittee define the model being used under WAC 173-340-747.

Ecology Response:

Thank you for your comment. WAC 173-340-747 discusses soil concentrations for groundwater protection. Ecology determined that groundwater cleanup standards did not need to be addressed in this closure plan. (See page H-A-23 in the FS-1 OCSA closure plan)

Comment # 17 from Russell Jim, Yakama Nation, dated September 18, 2015

[Section 2.1.]: YN requests cleanup levels are identified. YN requests clarification as to why there is no proposed cleanup levels identified in the Closure Plan or in the conditions.

Ecology Response:

Thank you for your comment. Cleanup levels are identified in Table H-A-7 in the FS-1 closure plan. The Permit Conditions require the Permittee to implement the requirements of the closure plan, including tables and figures contained therein.

Comment # 18 from Russell Jim, Yakama Nation, dated September 18, 2015

[Section 2.1.]: YN requests clarification and editing to reflect that both soils and gravels will be sampled. Sampling must be at a depth protective of human health and the environment.

Ecology Response:

Thank you for your comment. Ecology has determined there is no benefit in sampling the gravel at FS-1. The probability of finding contaminated gravel is minimal due to the unit being outdoors and the effects of precipitation. Any sound sampling practice would conclude that if contamination were to be present, it would be located in the soil beneath the gravel. Therefore, the soil beneath the gravel will be sampled.

Comment # 19 from Russell Jim, Yakama Nation, dated September 18, 2015

[Section HA3]: YN requests additional details. YN requests the Closure Plan for the FS-1 facility incorporate the required WAC 173-303 information in detail for the following:

Personnel Training Plan (In accordance with WAC 173-303-330.): Please ensure the following trainings/requirements are included as well:

- *Training related to equipment type [e.g., sampling equipment, operational procedures and equipment maintenance] relevant to task performed.*
- *For Samplers: Additional training in collecting, packaging & shipping of samples to field & off-site labs (including special requirements for collecting and packaging samples containing volatile organic materials that require acid preservatives or special filtering) and chain of custody procedures.*
- *Edit Table HA-1 to include requirement for sampler to have emergency response training.*

Ecology Response:

Thank you for your comment. Section 4.4(b) of the CAFO states “Respondent shall submit to Ecology a permit modification request in accordance with WAC 173-303-830 listed above in Paragraph 3.11 that include a written closure plan that satisfies the closure plan requirements at WAC 173-303-610.”

The CAFO only requires the submittal of closure plans to Ecology. The “Personnel Training Plan” information requested is for operating facilities. Any training information necessary to perform closure activities will be addressed in the closure plan.

Comment # 20 from Russell Jim, Yakama Nation, dated September 18, 2015

[Section HA3]: **Preparedness and Prevention Plan** (In accordance with WAC 173-303-340).

Inspection Plan (In accordance with WAC 173-303-320.): Please ensure the following information/requirements are included as well:

1. *Review of daily operating logbooks (including spill information) during closure activities.*
2. *Inspection of erosion damage & vegetative cover; to include looking for evidence of animal/pest intrusion such as anthills, termite nests, animal burrows, bird nests, water erosion, etc., that might spread contamination.*

3. *Replacement procedures for emergency & monitoring equipment to include checking for proper location of these (e.g., air monitoring equipment).*
4. *Surface inspections/security inspections; to include looking for damages to security postings; incorrect barriers, unidentified containers or hazardous wastes, site is free of obvious safety hazards, an evidence of spills or releases, etc. YN has requested no temporary placement of containers, however, should this be allowed, YN requests the information regarding container management to be included in the Inspection Plan.*

Ecology Response:

Thank you for your comment. Section 4.4(b) of the CAFO states “Respondent shall submit to Ecology a permit modification request in accordance with WAC 173-303-830 listed above in Paragraph 3.11 that include a written closure plan that satisfies the closure plan requirements at WAC 173-303-610.”

The CAFO only requires the submittal of closure plans to Ecology. The “Preparedness and Prevention Plan” and “Inspection Plan” information requested is for operating facilities. Any preparedness and prevention and inspection information necessary to perform closure activities will be addressed in the closure plan.

Comment # 21 from Russell Jim, Yakama Nation, dated September 18, 2015

[Section HA3]: **Contingency Plan/Contingent Post Closure Plan** (to include a groundwater monitoring plan) (In accordance with WAC 173-303-650(6)(c)(i).).

Ecology Response:

Thank you for your comment. Section 4.4(b) of the CAFO states “Respondent shall submit to Ecology a permit modification request in accordance with WAC 173-303-830 listed above in Paragraph 3.11 that include a written closure plan that satisfies the closure plan requirements at WAC 173-303-610.”

The CAFO only requires the submittal of closure plans to Ecology. The “Contingency Plan/Contingent Post Closure Plan” information requested is for operating facilities. Furthermore, the requirements at WAC 173-303-650(6)(c)(i) are for closure and post-closure care of surface impoundments, so the comment is out of scope.

Comment # 22 from Russell Jim, Yakama Nation, dated September 18, 2015

[Section HA3.1 & HA3.5]: Inadequate, as currently written, there are approximately three pages (Section HA3.1 pg. H-8 & HA3.5 pg 12) to describe in Personnel Training and what is understood to be intended as the Inspection Plan. Furthermore, advising the reader to "refer to the LLBG Trenches 31-34-94 DWTP" or Attachment 5 while unavailable via attachments or hyperlinks is inappropriate.

Ecology Response:

Thank you for your comment. Section 4.4(b) of the CAFO states “Respondent shall submit to Ecology a permit modification request in accordance with WAC 173-303-830 listed above in Paragraph 3.11 that include a written closure plan that satisfies the closure plan requirements at WAC 173-303-610.”

The CAFO only requires the submittal of closure plans to Ecology. The information requested is for operating facilities. Any training and inspection information necessary to perform closure activities will be addressed in the closure plan.

LLBG Trenches 31-34-94 DWTP is in the operating record and is available. Regarding hyperlinks, Ecology has determined that citing reference documents (e.g., LLBG Trenches 31-34-94 DWTP) is sufficient.

Comment # 23 from Russell Jim, Yakama Nation, dated September 18, 2015

[Section HA3.2]: YN requests inclusion of an explanation of the process of sending RCRA wastes to ERDF if this is to be considered as an option for closure of the FS-1.

Ecology Response:

Thank you for your comment. This comment is out of scope for this closure plan. No RCRA waste originating from FS-1 OCSA would be sent to ERDF.

Comment # 24 from Russell Jim, Yakama Nation, dated September 18, 2015

[Section HA3.2]: Preparedness and Prevention/Contingency Plans are lacking. Text in lines 11-14, pg. HA-10, 18-28, pg. HA-12 & lines 1-6, pg HA-13 certainly cannot be considered sufficient if these indeed are to be taken as representing contingency planning.

Ecology Response:

Thank you for your comment. Section 4.4(b) of the CAFO states “Respondent shall submit to Ecology a permit modification request in accordance with WAC 173-303-830 listed above in Paragraph 3.11 that include a written closure plan that satisfies the closure plan requirements at WAC 173-303-610.”

The CAFO only requires the submittal of closure plans to Ecology. The “Preparedness and Prevention/Contingency Plans” information requested is for operating facilities.

Comment # 25 from Russell Jim, Yakama Nation, dated September 18, 2015

[Section HA3.5]: YN requests more detailed description of how WAC 173-303-310 requirements are to be met.

Ecology Response:

Thank you for your comment. Warning signage is present at the Site. Additionally, the Hanford Site is patrolled by Hanford patrol officers. The entire Hanford Site is secured and is not accessible by the public. These measures satisfy WAC 173-303-310.

Comment # 26 from Russell Jim, Yakama Nation, dated September 18, 2015

[Section HA3.5]: YN requests inclusion of the following text in addition to edits to Section HA3.5: *Signs will be posted at public access points to FS-1 protected area stating, NO TRESPASSING. SECURITY BADGES REQUIRED BEYOND THIS POINT. AUTHORIZED VEHICLES ONLY. PUBLIC ACCESS PROHIBITED, or an equivalent legend. In addition, warning signs stating DANGER--UNAUTHORIZED PERSONNEL KEEP OUT, or an equivalent legend will be posted at all entrances to the unit. These signs are, or will be, written in English, legible from a distance of 7.6 meters, and visible from all angles of approach.*

Ecology Response:

Thank you for your comment. Warning signage is present at the Hanford Site. Additionally, the Hanford Site is patrolled by Hanford patrol officers. The entire Hanford Site is secured and is not accessible by the public. Security badges are required for all personnel accessing the Hanford Site.

Comment # 27 from Russell Jim, Yakama Nation, dated September 18, 2015

[Section HA3.7]: YN requests additional details: Examples: How the nature and extent of contamination will be evaluated; potential types of equipment; detail of equipment decontamination; how additional sampling efforts will be conducted; details to demonstrate compliance with the regulations stated.

Ecology Response:

Thank you for your comment. The level of detail in the closure plan is sufficient.

Comment # 28 from Russell Jim, Yakama Nation, dated September 18, 2015

[Section HA3.7]: YN requests additional information in Section HA3.7 as to how treatment (if needed) to meet WAC 173-303-140 (LDRs) will be performed.

Ecology Response:

Thank you for your comment. FS-1 does not currently and will not store dangerous wastes. All future activities at FS-1 support the closure of the unit, and therefore treatment is not necessary. The unit is being clean closed.

Comment # 29 from Russell Jim, Yakama Nation, dated September 18, 2015

[Section HA3.8]: YN requests addition to section HA3.8, line #8 text to state: "Clean closure must demonstrate *(and include documentation)* that unit operations did not adversely affect soils *and that groundwater has not been adversely impacted, as described in WAC 173-303-645.*"

Ecology Response:

Thank you for your comment. FS-1 was not an approved operating unit, and until it is clean closed, the unit is subject to the dangerous waste regulations. If contamination is found at FS-1 and remedial actions to remove contaminants are insufficient, the unit may then be subject to groundwater monitoring requirements, as described in WAC 173-303-645.

Comment # 30 from Russell Jim, Yakama Nation, dated September 18, 2015

[Section HA3.8]: YN disagrees with leaving a gravel surface at waste site. YN requests additional information regarding Ecology's pre-determined decision to leave a gravel surface in place at the FS-1 site. Please also provide information as to potential use of site and the permitting approach to be followed.

Ecology Response:

Thank you for your comment. FS-1 is adjacent to an operating mixed-waste trench (Trench 34). To prevent radioactive material from being spread by ecological vectors, the LLBGs are kept free of vegetation. Therefore, the gravel at FS-1 will remain in place and free of vegetation as long as Trenches 31 and 34 remain in operation.

Comment # 31 from Russell Jim, Yakama Nation, dated September 18, 2015

[Section HA3.9]: YN requests edits to Table HA-7: Soil Analytical Performance Requirements Practical Quantization Limits:

- *Establish a separate PQL for Hexavalent Chromium: Current limit exceeds Ecology's preference of 0.19mg/kg in soils to be protective of groundwater.*

- *Edit Silver for consistency with Table 2-2 (DOE/RL-2009-60, REV. 1-200-MG-1 OU SAP): 0.2mg/kg*
- *Edit Polychlorinated Biphenyl for consistency with Table 2-2:0.017*

Ecology Response:

Thank you for your comment. Ecology has updated Table H-A-7 to meet MTCA clean closure performance requirements as required by WAC 173-340.

Comment # 32 from Russell Jim, Yakama Nation, dated September 18, 2015

[Section HA3.9.5]: YN requests identification of MCTA Method B equation to be used and rationale. Please also edit Section HA3.9.13 as needed.

Ecology Response:

Thank you for your comment. This is not required. The Permittees followed the requirements established in MTCA WAC 173-340-740 and applied the current CLARC values.

Comment # 33 from Russell Jim, Yakama Nation, dated September 18, 2015

[Section HA3.9.12]: YN requests all sampling and analysis records, data, documents be maintained in the FS-1 unit files as well as the Administrative Record.

Ecology Response:

Thank you for your comment. There is no requirement for Ecology to maintain a copy of the sampling results in Ecology's administrative record (AR). However, the Permittee maintains results/records as part of their operating record as required by WAC 173-303-380.

Comment # 34 from Russell Jim, Yakama Nation, dated September 18, 2015

[Section HA3.9.13]: YN suggests edit to line 9 (and elsewhere) to read Table HA-7.

Ecology Response:

Thank you for your comment. Table H-A-7 is correct as listed in the closure plan.

Comment # 35 from Russell Jim, Yakama Nation, dated September 18, 2015

[Section HA3.10]: YN requests edits to line 19 or deletion; without completion of all sampling and confirmation that results support clean closure, the IQRPE report would be invalid.

Ecology Response:

Thank you for your comment. The role of the Independent Qualified Registered Professional Engineer (IQRPE) is to certify that sampling activities were completed in the manner specified in the closure plan. The IQRPE is not responsible in determining whether or not clean closure was achieved. It is up to Ecology to make a decision, based on the Permittees' closure verification package and the IQRPE report, on whether clean closure was achieved.

Comment # 36 from Russell Jim, Yakama Nation, dated September 18, 2015

[Section HA3.10]: YN requests the minimum field activities and documents reviewed by the IQRPE include all the supporting documentation listed on page HA-8. The IQRPE should have a thorough understanding of closure activities.

Ecology Response:

Thank you for your comment. The role of the IQRPE is to certify that sampling activities were completed in the manner specified in the closure plan. The IQRPE is not responsible in

determining whether or not clean closure was achieved. Additionally, the IQRPE does not have the authority to question a procedure or analytical method.

Comment # 37 from Russell Jim, Yakama Nation, dated September 18, 2015

[Section HA3.11]: YN requests edits to line 33 to delete the following text: *Upon request by Ecology*. The intent of this regulation is to ensure Ecology has all the information necessary to determine the IQRPE's certification is complete, not to have to ask the Permittee to provide the information. The financial obligations are not relevant to the Hanford site.

Ecology Response:

Thank you for your comment. The text "Upon request by Ecology" will remain in the closure plan. WAC 173-303-610(6) states "Documentation supporting the IQRPE's certification must be furnished to the department upon request."

Comment # 38 from Russell Jim, Yakama Nation, dated September 18, 2015

[Section HA3.11]: YN requests definition of what entails "minor deviations from the approved closure plan" be included in Closure plan and request a Permit Condition requiring the Permittee provide Ecology the justification for deviations within 7 days for Ecology's review and determination appropriateness of deviation or if additional sampling is warranted.

Ecology Response:

Thank you for your comment. Regarding a minor deviation, a permit condition would not be necessary, since there would be no modification to the closure plan. Although there would be no modification to the closure plan, the permittees must still notify Ecology of the deviation.

For example, the FS-1 OCSA closure plan identified 47 analytes of interest (Table H-A-4). A number of laboratories were used to complete all analyses. However, analysis of one analyte, the solvent Cellosolve (2-ethoxyethanol), could not be completed by any of the laboratories. The Permittees notified Ecology of the issue and gave a justification as to why 2-ethoxyethanol was being excluded as a constituent of concern. This deviation did not entail modifying the closure plan.

Comment # 39 from Russell Jim, Yakama Nation, dated September 18, 2015

[Section HA3.12]: YN has previously noted disagreement with leaving gravel in place and disputes non-restoration of the area. YN requests additional descriptive text to discuss the non-use of this area as a waste facility location.

Ecology Response:

Thank you for your comment. FS-1 is adjacent to an operating mixed-waste trench (Trench 34). To prevent radioactive material from being spread by ecological vectors, the LLBGs are kept free of vegetation. Therefore, the gravel at FS-1 will remain in place and free of vegetation as long as Trenches 31 and 34 remain in operation.

Comment # 40 from Russell Jim, Yakama Nation, dated September 18, 2015

[Section HA4]: YN notes Ecology has already provided DOE a temporary authorization for 180 days. Is the purpose of this section to allow an additional 180 days for closure? YN requests clarification within this section, in the Introduction section.

Ecology Response:

Thank you for your comment. An additional 180 days is allowed under WAC 173-303-830(4)(e)(iv).

Comment # 41 from Russell Jim, Yakama Nation, dated September 18, 2015

[Section HA4]: YN requests Table HA-9 be edited to reflect dates, activities, etc in more detail.

Ecology Response:

Thank you for your comment. Table H-A-9 does not need to be revised. All mixed low-level waste was removed in September 2008. Sampling activities were completed to comply with the Temporary Authorization (TA). The only activity remaining is for the Permittee to transmit closure certification to Ecology.

Comment # 42 from Russell Jim, Yakama Nation, dated September 18, 2015

[Section HA.a & HA.b]: YN requests, if possible, an Ecology staff inspector perform a walk-down of the FS-1 site to verify statements as to the no observation of staining.

Ecology Response:

Thank you for your comment. A walk-down of FS-1 was completed by an Ecology staff member.

Comment # 43 from Russell Jim, Yakama Nation, dated September 18, 2015

[Section HA.a & HA.b]: YN notes the Inspection Checklist Review form dated July 31, 2013 contains language appearing to allow extended time periods from the required weekly dates. YN requests Ecology thoroughly review the inspection process for the FS-1, the CAFO units, and the site in general where containers are stored/managed for potential permit violations.

Ecology Response:

Thank you for your comment. This comment is out of scope for this closure plan.

Comment # 44 from Russell Jim, Yakama Nation, dated September 18, 2015

[Section HA.a & HA.b]: YN notes the identification of a container, which required re-packaging, and requests Ecology review this incident and determine if there was a violation.

Ecology Response:

Thank you for your comment. This comment is out of scope for this closure plan.

Comment #45 from Russell Jim, Yakama Nation, dated September 18, 2015

[General YN comment regarding sampling]: YN requests Ecology ensure the information/approach presented in the Closure Plan meets or exceeds the following: YN request Sampling and Analysis Plan(s) [per WAC 173-303-610(3)(a)(v)] be consistent with Ecology Publication #09-05-007 [Guidance for Preparing Waste Sampling and Analysis Documents and QA/QC Requirements at Nuclear Waste Sites] and include the following:

- *Documentation of the necessary quantity and quality of data for each decision for which sampling and analysis may be required pursuant to conditions of this Chapter. [WAC 173-303-300(1)]*
- *The parameters for which each environmental media sample will be analyzed and the rationale for selecting these parameters and the frequency with which analysis of a waste*

will be reviewed, or repeated, to ensure that the analysis is accurate and current. [WAC 173-303-300(5)(a)]

- *Procedures for how non-detects, and any tentatively identified compounds which may be reported with laboratory analytical results will be assessed and/or used for decision-making purposes, and to identify any contaminants in addition to those already identified for which establishment of closure performance standards may be warranted. [WAC 173-303-300(5)(a)]*
- *Analytical methods, including field measurements, which will be used for analysis of environmental media samples. [WAC 173-303-300(5)(b)]*
- *Methods of obtaining representative samples of soils for all sampling and analysis, which may be, required pursuant to WAC 173-303-110 requirements and consistent with the requirements specified in WAC 173-340-810 and WAC 173-340-820. [WAC 173-303-300(5)(c)]*
- *A quality assurance/quality control (QA/QC) plan, or equivalent, to document all monitoring procedures 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 as defined. Each QA/QC plan shall contain a Data Quality Assurance Plan which includes the following:*
 - *Data Collection Strategy section including, but not limited to, the*
 - *A description of the intended uses for the data, and the necessary level of precision and accuracy for those intended uses; and,*
 - *A description of methods and procedures to be used to assess the precision, accuracy, and completeness of the measurement data;*
 - *Sampling section, this shall include or describe, and reference or cite:*
 - *Criteria for selecting appropriate sampling locations, depths, etc., or identification and justification of sample collection;*
 - *Sampling methods including the identification of sampling equipment and a description of decontamination procedures to be used;*
 - *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 Data Quality Objective (DQO) planning process;*
 - *Methods for, or specification of, measuring all necessary ancillary data;*
 - *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;*
 - *Criteria for, or specification of, identifying the type of sampling (e.g., discrete), and number of samples to be collected;*
 - *Criteria for, or specification of, measures to be taken to prevent contamination of the sampling equipment and cross contamination between sampling points;*
 - *Methods and documentation of field sampling operations and procedure descriptions, as appropriate, including:*

- *Procedure descriptions and forms for recording the exact location, sampling conditions, sampling equipment, and visual condition of samples;*
- *Calibration of field devices (as applicable);*
- *Collection of replicate samples;*
- *Submission of field-biased blanks, where appropriate;*
- *Potential interferences present at the facility;*
- *Field equipment listing and sample containers;*
- *Sampling order; and,*
- *Descriptions of decontamination procedures.*
- *Selection of appropriate sample containers, as applicable;*
- *Sample preservation methods, as applicable; and,*
- *Chain-of-custody procedure descriptions as applicable, including:*
- *Standardized field tracking reporting forms to establish sample custody in the field prior to, and during shipment; and,*
- *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.*
- *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;*
- *Provision for a laboratory sample custody log; and,*
- *Specification of chain-of-custody procedures for sample handling, storage, and disbursement for analysis.*
- *Sample storage procedure descriptions and storage times;*
- *Sample preparation methods;*
- *Descriptions of analytical procedures, including:*
- *Scope and application of the procedure;*
- *Sample matrix;*
- *Potential interferences;*
- *Precision and accuracy of the methodology; and,*
- *Method detection limits.*
- *Descriptions of calibration procedures and frequency;*
- *Data reduction, validation, and reporting;*
- *Internal laboratory quality control checks, laboratory performance, and systems audits and frequency, include:*
- *Method blank(s);*
- *Laboratory control sample(s);*
- *Calibration check sample(s);*
- *Replicate sample(s);*

- *Matrix-spiked sample(s);*
- *“Blind” quality control;*
- *Control charts;*
- *Surrogate samples;*
- *Each QA/QC plan to include a Data Management Plan, or equivalent, to document and track data and results.[WAC 173-303-380(1)(f)]. This plan should 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 should be identified. The plan should also provide the format to be used to record and, for projects, present the validated and invalidated data and conclusions.*
- *The Data Management Plan should include the following as applicable:*
 - *A data record including the following:*
 - *Unique sample or field measurement code;*
 - *Sampling or field measurement location including surveyed horizontal coordinates and elevation of the sample location, and sample or measurement type;*
 - *Sampling or field measurement raw data;*
 - *Laboratory analysis identification (ID) number;*
 - *Result of analysis (e.g., concentration);*
 - *Tabular displays, as appropriate, illustrating:*
 - *Unsorted validated and invalidated data;*
 - *Results for each medium and each constituent monitored;*
 - *Data reduction for statistical analysis;*
 - *Sorting of data by potential stratification factors (e.g., location, soil layer, topography); and,*
 - *Summary data.*
 - *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:*
 - *Displays of sampling location and sampling grid;*
 - *Identification of boundaries of sampling area and areas where more data is required;*
 - *Displays of concentrations of contamination at each sampling location;*
 - *Displays of geographical extent of contamination;*
 - *Aerial and vertical displays of contamination concentrations, concentration averages, and concentration maxima, including isoconcentration maps for contaminants found in environmental media at the Facility;*
 - *Illustrations of changes in concentration in relation to distance from the source, time, depth, or other parameters;*
 - *Identification of features affecting intramedia transport and identification of potential receptors;*

- *All data obtained should be made available to Ecology within forty-five (45) days of receipt or after completion of QA/QC activities, if applicable.*

Ecology Response:

Thank you for your comment. The regulatory requirement cited in the comment (WAC 173-303-300) applies to waste analysis, not environmental sampling and analysis. A Waste Analysis Plan will not be written because no waste is or will be managed at FS-1 OCSA.

- *Analytical work will be performed in compliance with the guidance set forth in the Hanford Analytical Services Quality Assurance Requirements Document (DOE/RL-96-68, Rev. 4).*
- *Analytical methods and procedures will be performed at laboratories that are accredited by the state of Washington.*
- *Sampling and analytical requirements are identified in Section 9.6 of the Tri-Party Agreement (TPA).*
- *Analytical data delivery schedules are included in Section 9.6.6 of the TPA.*
- *Soil sample locations and procedures for FS-1 OCSA closure are discussed in Section H-A3.9.5 and detailed in Appendix B of the closure plan.*

Comment #46 from Russell Jim, Yakama Nation, dated September 18, 2015

[YN comments on: PART V, CLOSURE UNIT GROUP 4 CONDITIONS 1 FS-1 OUTDOOR CONTAINER STORAGE AREA]: As currently drafted, these permit conditions for closure of the FS-1 waste management unit fail to meet the requirements of WAC 173-303-815 (2).

- *YN requests edits to V.4.B.1 to state: Once the closure plan is incorporated into Addendum H through the permit modification process, the Permittees will close the FS-1 according to the requirements in Addendum H. The Permittees will comply with all requirements set forth in the Addendum H, Closure 37 Plan for the FS-1 OCSA, and close the FS-1 OCSA in accordance with the Addendum H, 38 Closure Plan. [WAC 173-303- 610(3)(a)]*

Ecology Response:

Thank you for your comment. Condition V.4.B.1 will not be revised. Ecology management and the Attorney General's office have deemed the permit conditions included in the FS-1 closure plan as sufficient.

Comment #47 from Russell Jim, Yakama Nation, dated September 18, 2015

[YN comments on: PART V, CLOSURE UNIT GROUP 4 CONDITIONS 1 FS-1 OUTDOOR CONTAINER STORAGE AREA]:

- *YN requests Condition V.4.B.2 be deleted and the appropriate Conditions written to implement the WAC requirements for SAP, and Certification, etc.*

Ecology Response:

Thank you for your comment. Condition V.4.B.2 will remain in the closure plan. No additional permit conditions will be included.

Comment #48 from Russell Jim, Yakama Nation, dated September 18, 2015

[YN comments on: PART V, CLOSURE UNIT GROUP 4 CONDITIONS 1 FS-1 OUTDOOR CONTAINER STORAGE AREA]:

- **YN requests Ecology draft the following Permit Conditions for closure of the FS-1.** *Suggested text is provided for Ecology consideration in drafting of conditions. (Note YN does not know current Part I & II condition numbers and suggest these also be referenced along with WAC 173-303 requirements):*
 1. *The closure plan and sampling and analysis plan will meet the applicable closure and post-closure requirements of WAC 173-303-610 and WAC 173-303-630(10) pursuant to the requirements of this Chapter.*
 2. *The closure plan submitted pursuant to V.9.B.1 will specify dangerous constituents and corresponding closure performance standards to meet the requirements of WAC 173-303-610(2)(b)(i) for soils affected by the operations associated with this unit.*
 3. **Closure Performance standards** *for soils will satisfy the most stringent (lowest) cleanup level or standard of WAC 173-340, Model Toxics Control Act (MTCA) Cleanup Regulation. The numeric cleanup levels for soils will be calculated according to the MTCA cleanup methods described in WAC 173-340-700 through WAC 173-340-760. [WAC 173-303-283] or use the following:*

Closure of a RCRA TSD facility is described in these Dangerous Waste Regulations under WAC 173-303-610. WAC 173-303-610(2)(b)(i) requires for soils, groundwater, surface water, and air, the numeric cleanup levels calculated using residential exposure assumptions according to the Model Toxics Control Act Regulations (MTCA), chapter 173-340 WAC, as now or hereafter amended. Primarily, these will be numeric cleanup levels calculated according to MTCA Method B, although MTCA Method A may be used as appropriate (industrial use land).

To ensure compliance with the Dangerous Waste Regulations, include the following closure performance standards for contaminated soils:

 - *Closure performance standards for soils will satisfy the most stringent (lowest) of: [WAC 173-303-610(3)(a)(v)]*
 - *Direct contact consistent with WAC 173-340-900 (Table 745-1),*
 - *Soil concentrations to protect groundwater: derived using WAC 173-340-747(4),*
 - *Protection of ecological receptors achieved through one of the following methods:*
 1. *Excavation of contaminated soil to a minimum of 15 feet below ground surface, or*
 2. *Excavation of contaminated soil such that residual soil concentrations do not exceed ecological screening levels listed in WAC 173-340-900 (Table 749-1), or*
 3. *A site-specific demonstration that remedial standards eliminate threats to ecological receptors.*
 4. **General Waste Management Requirements:** *All waste analysis required by this chapter will be conducted according to the approved sampling and analysis plan.*

No temporary placement of containers is allowed in the FS-1 unit.

5. **Modifications:** *Changes to the analytical methods used in this permit will require prior Ecology approval according to WAC 173-303-830, Permit Changes.*
6. **Recordkeeping and Reporting:** *The Permittees will place documentation of all work conducted pursuant to this Chapter including results of all monitoring, testing, or analytical work and associated quality assurance and quality control data in the Hanford Facility Operating Record, as required by Permit Condition II.I.2. [WAC 173-303-380].*
7. **Security:** *The Permittees will post signs at access points to the FS-1 stating the following (or an equivalent legend): Danger – Unauthorized Personnel Keep Out. These signs will be written in English, legible from a distance of 7.6 meters (25 feet), and visible from all angles of approach. [WAC 173-303-310]*
8. **Preparedness and Prevention:** *Within 30 days of approval of FS-1 Permit Conditions, the Permittee shall submit to Ecology a permit modification for inclusion of a Preparedness and Prevention plan into the Closure Plan[WAC 173-303-340]*
9. **Personnel training:** *The Permittees will comply with the training requirements as described in Permit Condition II.C (Personnel Training), Permit Attachment 5 (Hanford Facility Personnel Training Plan), and Addendum H Closure Plan for the FS-1[WAC 173-303-330].*
 - *The Permittee will comply with the following trainings/requirements as well:*
 - *Training related to equipment type [e.g., sampling equipment, operational procedures and equipment maintenance] relevant to task performed.*
 - *For Samplers: Additional training in collecting, packaging & shipping of samples to field & off-site labs (including special requirements for collecting and packaging samples containing volatile organic materials that require acid preservatives or special filtering)and chain of custody procedures.*
10. **Contingency plan and emergency procedures:** *Within 30 days of approval of FS-1 Permit Conditions, the Permittee shall submit to Ecology a permit modification for inclusion of a Contingency Plan and Emergency Procedures Plan into the Closure Plan[WAC 173-303-350]*
11. **Inspections:** *Within 30 days of approval of FS-1 Permit Conditions, the Permittee shall submit to Ecology a permit modification for inclusion of Inspection plan/schedule into the Closure Plan[WAC 173-303-320]. The Permittee will follow the inspection schedule until closure of the unit. Inspections shall be at a minimum of a weekly schedule. In the event of any potential threats to human health or the environment [spills or discharges], the Permittee will and remedy the problems and notify Ecology.*
 - *The Permittee will comply with the following information/requirements as well: Inspection of erosion damage & vegetative cover; to include looking for evidence of animal/pest intrusion such as anthills, termite nests, animal burrows, bird nests, water erosion, etc., that might spread contamination.*
 - *Replacement procedures for emergency & monitoring equipment to include checking for proper location of these (e.g., air monitoring equipment).*

- *Surface inspections/security inspections; to include looking for damages to security postings; incorrect barriers, unidentified containers or hazardous wastes, site is free of obvious safety hazards, an evidence of spills or releases, etc.*

Ecology Response:

Thank you for your comment. Ecology management and the Attorney General's office reviewed the closure plan, and determined the conditions within the plan achieve the objectives for closure. Any of the information listed above that was applicable to closure activities has been included in the closure plan. The closure plan will not be revised.

SEPA Comments

Comment #49 from Russell Jim, Yakama Nation, dated September 18, 2015

YN comments on: State Environmental Policy Act checklist for the Hanford Facility FS-1

Closure: YN notes Ecology has presented a final determination mitigated non-significance (MDNS) without consideration of public comments. We request clarification on the determination of the MDNS process.

Ecology Response:

Thank you for your comment. Ecology issues its SEPA threshold determination when it takes an action (e.g., issues a draft permit) unless the action is exempt by statute or categorical exemption that appears in WAC-197-11-800. Ecology issued a draft closure plan for Part V Closure Unit Group 4 FS-1 Outdoor Container Storage Area for public comment on August 3, 2015. The comment period ended September 18, 2015. The SEPA threshold determination (in the form of a mitigated determination of non-significance) was included with the draft closure plan.

Ecology received comments on the determination of non-significance (DNS), to which it must respond. Ecology will consider the comments, and then may take one of the following actions:

- *Retain the DNS.*
- *Issue a modified DNS.*
- *Withdraw the DNS and conduct additional reviews.*

For more information on DNS, see the SEPA Handbook Sections 2.5 Evaluate the Proposal, 2.8 Issuing a determination of non-significance, and subsection 2.8.4 Responding to comments on a DNS.

To access the SEPA Handbook Sections, select the following link:

<http://www.ecy.wa.gov/programs/sea/sepa/handbk/hbch02.html>

Comment #50 from Russell Jim, Yakama Nation, dated September 18, 2015

YN requests inclusion of the following in the Description of proposal section:

- This SEPA Environmental Checklist is being concurrently prepared with a closure plan [FS-1 Outdoor Container Storage Area Closure Plan-Addendum HA] prepared in accordance with Washington Administrative Code (WAC) 173-303 Dangerous Waste Regulations.*
- Citation reference WAC 197-11-960.*

Ecology Response: *Thank you for your comment.*

- a. **No change required.** SEPA Guidance Publication #02-06-018 states that Item A.11 Project Description should provide a description of the type of project, and the actions that would occur (e.g., grade, fill, clear, construct, operate, close, demolish, mine).*
- b. **No change required.** The SEPA checklist form does not contain reference to WAC-197-11-960. To access the Ecology SEPA form, please copy the following link into your browser: <http://www.ecy.wa.gov/programs/sea/sepa/forms.htm>.*

Comment #51 from Russell Jim, Yakama Nation, dated September 18, 2015

YN requests edits to #8 to include the following information: Environmental information related to FS-1 is contained in DOE/RL-2004-60, Draft B Radioactive Landfills Group Operable Unit RCRA Facility Investigation/Corrective Measures Study/Remedial Investigation/Feasibility Study Work Plan *and* groundwater data contained in the Hanford Environmental Information System (ISIS). YN requests inclusion of this information (and radionuclide contaminants of concern in the adjacent Trench 34 waste site and its groundwater unit) in the Introduction for document continuity and comprehensive public understanding of the entire RCRA LLBG disposal processes.

Ecology Response:

Thank you for your comment. Ecology Publication #02-06-018, A.8. Environmental Information, states, “Include reports, studies, or other environmental documents that have been, are being, or will be prepared that provide relevant environmental information about your project, the site, or the area. They may have been developed during planning by the city or county, etc.”

The SEPA checklist lists the documents as references. The lists do not include data from the reports.

The Operable Unit reports address radiological contaminants of potential concern. The Washington Dangerous Waste regulations do not address radionuclides as contaminants of potential concern.

Comment #52 from Russell Jim, Yakama Nation, dated September 18, 2015

YN requests edits to #9 to include the following information: DOE/RL has forwarded the aforementioned FS-1 Closure Plan to Ecology.

Ecology Response:

*Thank you for your comment. **No change required.** Per Publication #02-06-018, A.9 Pending Approvals includes “any permits, funding, or other approvals that have already been applied for that affect the project site but are not part of the current proposal.” By that definition, the Closure Plan is precluded from inclusion.*

Comment #53 from Russell Jim, Yakama Nation, dated September 18, 2015

YN requests edits to #11 to include the following information needed to achieve clean closure:

- a. Remove all dangerous, mixed and TSCA-PCB LLW waste inventory.*
- b. Review waste container storage, operating, and inspection records*

- c. *Perform a visual inspection of gravel and visible surface soil (completed; see Section HA3.3).*
- d. *Resample, as necessary, to confirm that MTCA (WAC 173-340) Method B clean-closure levels have been met.*
- e. *Transmit closure certification to the Washington State Department of Ecology (Ecology).*

Ecology Response: *Thank you for your comment.*

- a. **No change required.** *On page 4 of 16 in the checklist, item A.11, paragraph 3, sentence 1 states “FS-1 does not currently store dangerous, mixed or TSCA-PCB waste.” In addition, paragraph 5 includes a list of sampling activities required to verify clean closure. Bullet 2 of the list states that the USDOE and its contractor will remove any contaminated environmental media detected during initial sampling efforts.*
- b. **No change required.** *On page 4 of 16, Item A.11, the USDOE stated that as a storage unit, clean closure determination for FS-1 is partially based on review of the operational history, operating records, waste management records, and a visual inspection of the area to verify that waste-related staining is not present. No containers are currently in storage at FS-1.*
- c. **No change required.** *On page 4 of 16, Item A.11, paragraph 4, sentence 1 states that the clean closure determination for FS-1 is partially based on “... a visual inspection of the area to verify that waste-related staining is not present.” Sampling activities required to verify clean closure for gravel/soil will detect any contaminated environmental media present.*
- d. **No change required.** *On page 4 of 16, paragraph 5, bullet 3, the requirement already appears in list of sampling activities.*
- e. **No change required.** *As stated in Item A.1, paragraph 1, last sentence, “the scope of this SEPA checklist is limited to the sampling activities in accordance with the closure plan.” Submission of the closure certification is not part of that scope.*

Comment #53a from Russell Jim, Yakama Nation, dated September 18, 2015

Environmental elements:

- *Air:*
 - *#a: YN requests additional text: Dust from demolition activities will be generated.*
 - *#c: YN requests more information regarding visible dust emissions from active demolition activities, water usage for dust suppressions, etc.*

Ecology Response: *Thank you for your comment.*

#a: No change required. *The scope of the checklist is sampling. It does not include demolition of the FS-1. In item B.1.e., the USDOE states that site development is complete and no filling or grading is expected. The sampling effort will encompass collecting samples from 21 grab sample locations in a triangular grid on the gravel surface down to previously disturbed soil underneath (0 to 6 inches).*

#c: No change required. *No demolition activities are planned.*

Comment #53b from Russell Jim, Yakama Nation, dated September 18, 2015

Environmental elements:

- *Energy and Natural Resources*
 - #a: *YN requests inclusion of following: Fossil fuel will be used in vehicles to access the site, conduct demolition, and remove waste.*

Ecology Response: *Thank you for your comment.*

- **No change required.** *On p. 9 of 16, item B.6.a text states that oil and gas will be used in vehicles to access the site.*
- **No demolition is planned.** *Only soil samples (unused portions) and contaminated soil (if any if removed) will require disposition off of the FS-1 site.*

Comment #53c from Russell Jim, Yakama Nation, dated September 18, 2015

Environmental elements:

- *Environmental Health:*
 - #a: *Please include additional information as to whether there are any known or possible contamination at the site from present or past uses.; the existing hazardous chemicals/conditions that might affect the project development and design, including underground hazards , etc.; describe any toxic or hazardous chemicals which might be stored, used,, or produced during the project.*

Ecology Response: *Thank you for your comment. No change required. Item A.11 (page 4 of 16) states that the FS-1 is gravel-covered rectangular area defined at the perimeter by metal T-posts. No equipment or structures are located at the storage area.*

Further, FS-1 does not currently store dangerous, mixed, or TSCA-PCB waste. The USDOE asserted that it will not request future dangerous waste storage and treatment of those wastes after FS-1 closure is complete.

Comment #53d from Russell Jim, Yakama Nation, dated September 18, 2015

Environmental elements:

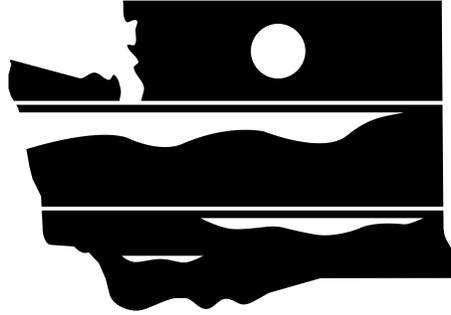
- *Historical and cultural preservation:*
 - *YN requests a much more complete explanation of the Cultural Resources Reviews within the 200 Areas of the Hanford site and the methods used to assess the potential impacts to the cultural and historic resources on or near the project site.*

Ecology Response: *Thank you for your comment. No change required. The USDOE contractor performed an ecological and cultural clearance for the FS-1 Outdoor Container Storage Area. The results appear in MSA-1501895, which can be acquired by contacting USDOE.*

Appendix A: Copies Of All Public Notices

Public notices for this comment period:

1. Fact Sheet
2. Public notice (focus sheet)
3. Classified advertisement in the *Tri-City Herald*
4. Notice sent to the Hanford-Info email list



DEPARTMENT OF
ECOLOGY
State of Washington

Fact Sheet

**Proposed Permit Modification to Part V of the
*Hanford Facility Resource Conservation and Recovery Act Permit, Dangerous
Waste Portion, Revision 8C, for the Treatment, Storage, and Disposal of
Dangerous Waste,*
WA7890008967, to add Closure Unit Group 4, FS-1 Outdoor Container Storage
Area**

August 2015

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Fact Sheet

Proposed Permit Modification to Part V of the *Hanford Facility Resource Conservation and Recovery Act Permit, Dangerous Waste Portion, Revision 8C, for the Treatment, Storage, and Disposal of Dangerous Waste,* WA7890008967, to add Closure Unit Group 4, FS-1 Outdoor Container Storage Area

Permittees

United States Department of Energy
Richland Operations Office
PO Box 550
Richland, Washington 99352

CH2M Hill Plateau Remediation Company
PO Box 1600 H7-30
Richland, Washington 99352

The Washington State Department of Ecology (Ecology) developed this Fact Sheet to fulfill the requirements of Washington Administrative Code (WAC) 173-303-840(2)(f).

The Fact Sheet provides information on Ecology's decision to modify Part V of the *Hanford Facility Resource Conservation and Recovery Act Permit, Dangerous Waste Portion, Revision 8C, for the Treatment, Storage, and Disposal of Dangerous Waste* (hereafter called the Site-wide Permit). This draft permit modification adds Closure Unit Group 4, FS-1 Outdoor Container Storage Area (FS-1 OCSA) to Part V of the Site-wide Permit.

This Fact Sheet is divided into seven sections:

- 1.0 Site-wide Permit.
- 2.0 FS-1 Outdoor Container Storage Area Description.
- 3.0 The Permitting Process.
- 4.0 Procedures for Reaching a Final Decision on the Draft Permit Modification.
- 5.0 Proposed Modification to Part V of the Site-wide Permit.
- 6.0 State Environmental Policy Act (SEPA)
- 7.0 Temporary Authorization

1.0 Site-wide Permit

Ecology first issued the Site-wide Permit in 1994. The Site-wide Permit provides standard and general facility conditions, as well as unit-group conditions for the operation, closure, and post-closure care of mixed and dangerous waste management units (DWMU) at Hanford. These DWMUs are administratively grouped into operating, closure, or post-closure unit groups in the Site-wide Permit. Each unit group may contain one or more DWMU.

Conditions of the Site-wide Permit are presented in six parts:

- Part I Standard Conditions.

Part II	General Facility Conditions.
Part III	Unit-Group Conditions for Final Status Operating Units.
Part IV	Corrective Action for Past Practice Units.
Part V	Unit-Group Conditions for Units Undergoing Closure.
Part VI	Unit-Group Conditions for Units in Post-Closure.

The Washington State Dangerous Waste Regulations in WAC 173-303-830 describe the types of changes or modifications that may be made to a Dangerous Waste Permit issued by Ecology.

This draft permit modification adds Closure Unit Group 4, FS-1 OCSA to Part V of the Site-wide Permit. The Part V, Closure Unit Group 4 draft permit modification consists of the FS-1 OCSA Closure Plan in Addendum H, and unit group permit conditions specific to closure of the FS-1 OCSA. Adding the FS-1 OCSA to Part V of the Site-wide Permit is a Class 3 permit modification.

2.0 FS-1 Outdoor Container Storage Area Description

The FS-1 OCSA is located along the south side of low-level burial ground (LLBG) 218-W-5 Trench 34. It is a gravel covered, rectangular area approximately 14 meters wide by 69 meters long (46 by 226 feet), equaling a total storage area of 966 square meters (10,390 square feet). The perimeter of the FS-1 OCSA is defined by metal T-posts, with the corner posts holding signs designating the area as "FS-1." No structures or equipment are located at the storage area. (See Figures 1 and 2.)

In November 2004, the FS-1 OCSA was originally designated as a temporary waste storage area for low-level waste (LLW) containers from the 300 Area prior to disposal into LLBG Trench 34. The temporary storage of LLW ended in July 2005. From November 2007 through September 2008, the FS-1 OCSA was used for the storage of LLW, mixed low-level waste (MLLW), and *Toxic Substances Control Act of 1976*-polychlorinated biphenyl (TSCA-PCB) LLW containers prior to disposal into Trenches 31 and 34. The FS-1 OCSA is no longer storing dangerous, mixed, or TSCA-PCB waste, and will close.

The maximum inventory of MLLW and TSCA-PCB LLW stored on the FS-1 OCSA included:

- Four MLLW containers with an approximate total volume of 12 cubic meters (424 cubic feet).
- Seven TSCA-PCB LLW containers with an approximate total volume of 1.5 cubic meters (51 cubic feet).

A radiological survey was performed on the FS-1 OCSA in March 2012. The survey confirmed no radiological contamination above the expected background levels.



**Figure 1. Aerial view of FS-1 Outdoor Container Storage Area (outlined in red).
Photo taken in November 2011.**



Figure 2. FS-1 Outdoor Container Storage Area. Photo taken in February 2013.

3.0 The Permitting Process

In June 2013, the U.S. Environmental Protection Agency (EPA) issued a Consent Agreement and Final Order (CAFO) against the U.S. Department of Energy (USDOE) for violations of the Resource Conservation and Recovery Act of 1976 (RCRA) program at the Hanford Facility's Solid Waste Operations Complex (SWOC). The EPA CAFO was based on information collected during a 2011 inspection, and other information.

The alleged violations included:

- Storage of hazardous waste without a permit.
- Failure to meet closure plan requirements.
- Failure to submit closure notice and closure plans.
- Failure to comply with land disposal restriction requirements.

Changes to the Site-wide Permit are required by an EPA CAFO issued against USDOE. These changes are summarized as follows:

- Stop receiving waste in the DWMUs listed in the CAFO.
- Submit closure plans to Ecology within 120 days of receipt of the CAFO for the DWMUs listed in the CAFO.
- Immediately comply with all applicable final facility standards for the management of dangerous waste found in WAC 173-303-600(1) for the units listed in the CAFO.
- Submit closure plans to Ecology for the 221-T Railroad Tunnel DWMU and the 2401-W DWMU within 120 days of receipt of the CAFO, unless prior to that date Ecology approves an extension of closure per WAC 173-303-610(4)(a) or (b).
- Immediately stop the placement of prohibited dangerous waste in Trenches 31 and 34, unless the waste meets treatment standards found in WAC 173-303-140.

The FS-1 OCSA is part of the Hanford Facility's SWOC, and is included in the EPA CAFO list of DWMUs that require a closure plan. USDOE has agreed with EPA to close the FS-1 OCSA, as it was never authorized for hazardous/dangerous waste storage.

On October 11, 2013, USDOE submitted a Class 3 permit modification request to Ecology which included closure plans for the DWMUs listed in EPA CAFO. In all, 14 closure plans were submitted, including the closure plan for the FS-1 OCSA. The USDOE issued the closure plans for a 60-day public comment period that ran from October 30, 2013 to January 6, 2014, and included a public meeting held on December 9, 2013. Numerous public comments were received on the closure plans, and are addressed in the Response to Comments document that accompanies this draft permit modification. The Response to Comments document from the USDOE 60-day public comment period is also available online at <http://www.ecy.wa.gov/programs/nwp/commentperiods.htm>.

4.0 Procedures for Reaching a Final Decision on the Draft Permit Modification

The Washington State Hazardous Waste Management Act (Chapter 70.105, Revised Code of Washington) and the rules declared in WAC Chapter 173-303 regulate the management of dangerous waste in Washington State. WAC 173-303-800 requires facilities that treat, store, and/or dispose of dangerous waste to obtain a permit for these activities.

This draft permit modification was prepared according to the procedures in WAC 173-303-840(2). Regulatory requirements for public notice and involvement on draft permits are described in WAC 173-303-840(3) and (4). As required by WAC 173-303-840(3)(d), draft permits will have at least a 45-day public comment period. The public comment period for this draft permit begins on August 3, 2015, and ends on September 18, 2015.

Comments must be post-marked, received by e-mail, or hand-delivered no later than close of business (5:00 p.m. PST) September 18, 2015. Direct all written comments to:

John Temple
Washington State Department of Ecology
3100 Port of Benton Blvd.
Richland, Washington 99354
E-mail address: hanford@ecy.wa.gov

In accordance with WAC 173-303-840(10)(c), when a permit is modified, only those conditions to be modified will be reopened when a new draft permit is prepared. In the case of this draft permit, only Part V, Closure Unit Group 4, FS-1 Outdoor Container Storage Area is open for public comment. All other aspects of the existing Site-wide Permit remain in effect for the duration of the draft permit modification.

Ecology will consider and respond to all written comments on this draft permit modification submitted by the deadline. Ecology will then make a final permit decision, which will become effective 30 days after Ecology provides notice of the decision to the Permittees and to all who commented. If the final decision includes substantial changes to the draft permit modification because of public comment, we will initiate a new public comment period.

A public hearing is not scheduled, but if there is enough interest Ecology will consider holding one. To request a hearing or for more information, contact:

Dieter Bohrmann
Washington State Department of Ecology
509-372-7950
E-mail address: hanford@ecy.wa.gov

After completion of the 45-day public comment period, Ecology will provide a Response to Comments document and a notification of the final permit decision to the Permittees and all others who commented. The final permit decision may be appealed within 30 days after issuance of that decision.

Copies of the Part V, Closure Unit Group 4, FS-1 Outdoor Container Storage Area draft permit modification are available for review at the Hanford Public Information Repositories. For additional information, call the Hanford Cleanup Hotline toll-free at 800-321-2008 or email hanford@ecy.wa.gov.

Hanford Public Information Repositories

Richland

United States Department of Ecology
Nuclear Waste Program Resource Center
3100 Port of Benton Boulevard
Richland, Washington 99354
Contact: Valarie Peery (509) 372-7950

United States Department of Energy
Administrative Record
2440 Stevens Drive
Richland, Washington 99354
Contact: Heather Childers (509) 376-2530

United States Department of Energy
Reading Room
2770 Crimson Way
Richland, Washington 99354
Contact: Janice Parthree (509) 375-3308

Portland

Portland State University
Branford Price Millar Library
1875 Southwest Park Avenue
Portland, Oregon 97207
Contact: Claudia Weston (503) 725-4542

Seattle

University of Washington Suzzallo Library
PO Box 352900
Seattle, Washington 98195
Contact: Hilary Reinert (206) 543-5597

Spokane

Gonzaga University
Foley Center
502 East Boone Avenue
Spokane, Washington 99258
Contact: John Spencer (509) 313-6110

This Fact Sheet and Public Notice for the proposed permit modification is also available online at <http://www.ecy.wa.gov/programs/nwp/commentperiods.htm>. If special accommodations are needed for public comment, contact Ecology's Nuclear Waste Program at 509-372-7950.

5.0 Proposed Modification to Part V of the Site-wide Permit

The proposed draft permit modification adds Closure Unit Group 4, FS-1 OCSA to Part V of the Site-wide Permit. The draft permit modification consists of a unit description, a closure plan in Addendum H for closing the FS-1 OCSA, and unit group permit conditions.

5.1 Closure Actions

Closure of the FS-1 OCSA will be conducted in accordance with the approved Addendum H, Closure Plan. Clean closure will be based on requirements in WAC 173-303-610(2), "Closure performance standard." Those regulations require closure of the facility in a manner that:

- Minimizes the need for further maintenance.
- Controls, minimizes, or eliminates to the extent necessary to protect human health and the environment, post-closure escape of dangerous waste, dangerous constituents, leachate, contaminated runoff, or dangerous waste decomposition products to the ground, surface water, groundwater, or the atmosphere.
- 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.

The FS-1 OCSA will be clean closed. The gravel and soil will be sampled and must meet regulatory required clean closure levels.

5.2 Basis for Closure Unit Group 4 Permit Conditions

The unit group Permit Conditions and Addenda in Part V, Closure Unit Group 4 are intended to protect human health and the environment by ensuring the FS-1 OCSA is closed according to the approved Addendum H, Closure Plan. Ecology reviewed the closure plan submittal for the FS-1 OCSA; and has included permit conditions to ensure the Permittees comply with environmental standards, and modify the closure plan as needed during closure activities.

Permit Condition V.4.A is a standard condition that appears as the first permit condition for each unit group. It refers to the Site-wide Permit Attachment 9, Permit Applicability Matrix, which identifies which Part I and Part II Permit Conditions are applicable to DWMUs within Part III, V or VI unit groups. The permit condition also prevents conflicts between the unit group permit conditions, and the Part I and II Permit Conditions.

Permit Condition V.4.B.1 requires the Permittees to comply with all of the requirements set forth in the Addendum H, Closure Plan, and to close the FS-1 OCSA in accordance with the plan.

Permit Condition V.4.B.2 is intended to ensure sampling assumptions made in the Addendum H, Closure Plan, Attachment H-A.b, Visual Sampling Plan Supporting Documentation were met. If sampling assumptions were not met, the permit condition requires the Permittees to submit a permit modification request to amend the closure plan to include a revised sampling design.

6.0 State Environmental Policy Act (SEPA)

In accordance with WAC 187-11-960, the Permittees provided a completed SEPA environmental checklist to Ecology for the FS-1 OCSA. Ecology review of the checklist, resulted in a Mitigated Determination of Nonsignificance. A copy of the Mitigated Determination of Nonsignificance is available online at

<http://www.ecy.wa.gov/programs/nwp/commentperiods.htm>.

7.0 Temporary Authorization

The Permittees have requested a temporary authorization in accordance with WAC 173-303-830(3)(e), to begin closure actions at the FS-1 OCSA. Ecology has granted this temporary authorization request for 180 days, from August 3, 2015 to January 29, 2016.

Closure Plan for FS-1 Outdoor Container Storage Area

Washington’s Department of Ecology invites you to comment on a proposed change to Hanford’s dangerous waste permit. The change is to close an outdoor container storage area next to Trench 34 of the Low-Level Burial Grounds (LLBG) in Hanford’s 200 West Area.

Hanford’s Solid Waste Operations Complex (SWOC)

This storage area, which is at the SWOC, has not stored waste since 2008. The permittees, U.S. Department of Energy–Richland Operations Office (DOE-RL) and CH2M Hill Plateau Remediation Company (CHPRC) agreed through a Consent Agreement and Final Order (CAFO) to close it.

The CAFO outlines steps the permittees must take to satisfy violations that were found during inspections in 2012. One of the steps in the CAFO is to close parts of the SWOC that are not in use or were never authorized for use.

The permittees plan to clean close this storage area. They have already removed all waste, reviewed records, and visually inspected the site. The gravel and soil will be sampled to confirm it meets the standards in the state’s Model Toxics Control Act, Method B.

Storage Area Facts

FS-1 Outdoor Container Storage Area is owned and operated by the DOE-RL and CHPRC.

The storage area is gravel, has no structures or equipment and measures 15 by 75 yards. It is on the south side of LLBG 218-W-5 Trench 34 and its boundaries are marked with corner posts and signs.

From November 2004 to July 2005, the area was used to store low-level waste (LLW). From November 2007 to September 2008, it was used to store LLW, mixed LLW (waste that also had chemical hazards), and LLW waste with polychlorinated biphenyls (PCBs).

In October 2013, the DOE-RL submitted a Class 3 permit change request to close this storage area and several other inactive sites at the [Central Waste Complex](#) and [T-Plant](#).

WHY IT MATTERS

At the Department of Ecology Nuclear Waste Program, we work to make sure Hanford’s cleanup follows our state’s regulations to protect our air, land, water — and citizens.

It is important that only areas authorized by the permit are allowed to store waste. Other areas that have been used without authorization need to be closed. FS-1 is one of those areas.

Before we make our decision on this permit modification, we invite you to comment.

PUBLIC COMMENT PERIOD

August 3 – September 18, 2015

To Submit Comments

Please send comments by email (preferred), U.S. mail, or hand deliver them to:

John Temple
3100 Port of Benton Blvd.
Richland, WA 99354
Hanford@ecy.wa.gov

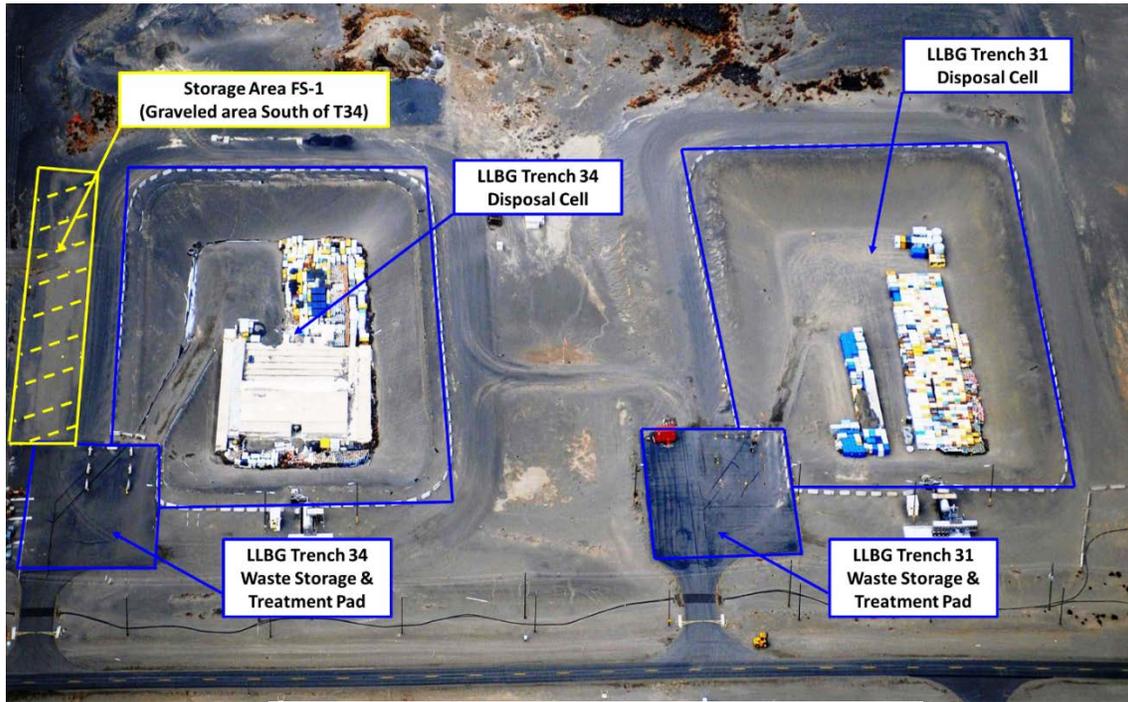
Public Hearing

A public hearing is not scheduled, but if there is enough interest, we will consider holding one. To request a hearing or for more information, contact:

Dieter Bohrmann
509-372-7950
Hanford@ecy.wa.gov

Tips on Effective Commenting

www.ecy.wa.gov/biblio/0307023.pdf



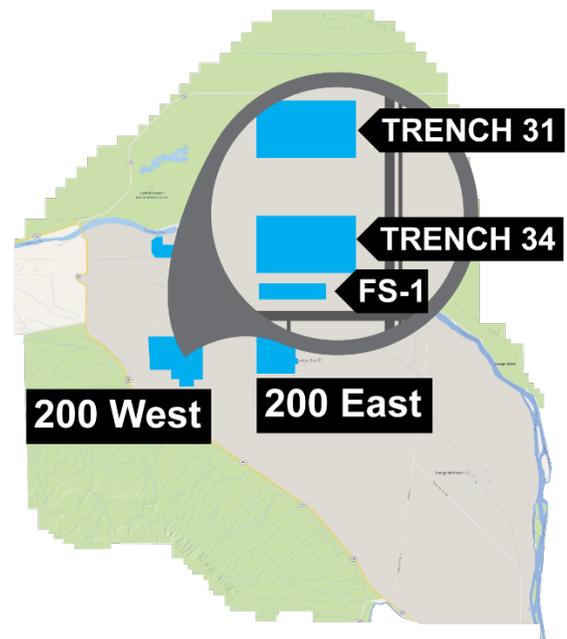
Location of FS-1 in relation to LLBG Trenches 31 and 34

Remaining CAFO Units within the SWOC

Besides this storage area, the CAFO listed eight other dangerous waste management units to be closed at the T Plant and Central Waste Complex. In the October 2013 proposal, the permittees included five other areas to be closed at T Plant.

In the next several months, Ecology will hold 45-day comment periods for some of the closure plans for those areas. Next year Ecology will hold comment periods for the remaining closure plans.

Ecology’s efforts continue to ensure the closure plans for all the areas are thorough and the schedule for the work meets regulations. Closing these inactive areas is “Phase 1” for satisfying the CAFO to permit the SWOC facilities. “Phase 2” will follow next year, and Ecology will ensure every element of our regulations for dangerous waste permits are met for the SWOC facilities.



Location of FS-1

Terms to Know

CAFO - Consent Agreement and Final Order – the outcome of the U.S. Environmental Protection Agency’s enforcement action in 2012 requiring updates to bring facilities at Hanford into compliance with the state’s Dangerous Waste Regulations.

Clean Closure – A clean closure means the hazardous materials are all removed, and nothing hazardous remains to be regulated. Then the area can be removed from the permit.

LLW – Radioactive wastes other than irradiated fuel, high-level, transuranic, uranium mill tailings or byproduct material.

Model Toxics Control Act (MTCA) Method B – cleanup levels at least as strict as requirements in other state and federal regulations, and levels calculated using equations in Washington Administrative Codes 173-340-720 through -750.

SWOC – Solid Waste Operations Complex – areas of Hanford handling solid waste such as burial grounds Trenches 31, 34, and 94. And the Central Waste Complex, [Waste Receiving and Processing Facility](#), and T-Plant complex.

Class 3 Modification - A Class 3 permit change is for the most significant of changes. It requires a permittee-led comment period on the proposal, then an Ecology-led comment period on the draft permit change.



The FS-1 storage area is on the south side of LLBG 218-W-5 Trench 34 in Hanford’s 200 W Area



3100 Port of Benton Blvd.
Richland, WA 99354

Public Comment Period

August 3 – September 18, 2015
Revising Hanford's Dangerous
Waste Permit to add a Closure Plan
for the Outdoor Container Storage
Area at Hanford's Trench 34.

Hanford's Information Repositories and Document Review Locations

Richland

Department of Ecology

Nuclear Waste Program Resource Center
3100 Port of Benton Blvd.
Richland, WA 99354
Contact: Valarie Peery, 509-372-7950

U.S. Department of Energy

Public Reading Room
Washington State University
Tri-Cities Consolidated Info Center, Rm. 101-L
2770 Univ. Drive Richland, WA 99354
Contact: Janice Scarano (509) 372-7443

U.S. Department of Energy

Administrative Record and
Public Information Repository
2440 Stevens Center Place, Rm 1101,
Richland, WA 99352
(509) 376-2530
map: <http://pdw.hanford.gov/arpir/>

Portland

Portland State University

Government Information
Branford Price Millar Library
1875 SW Park Ave., Portland, OR 97207
Contact: Claudia Weston (503) 725-4542
map: www.pdx.edu/map.html

Spokane

Gonzaga University

Foley Center Library
E. 502 Boone Ave., Spokane, WA 99202
Contact: John Spencer (509) 313-6110
map: <http://tinyurl.com/2c6bpm>

Seattle

University of Washington

Suzzallo Library
Government Publications Dept.
Box 352900 Seattle, WA 98195-2900
Contact: Cass Hartnett (206) 685-3130
map: <http://tinyurl.com/m8ebj>

Special accommodations: To request ADA accommodation including materials in a format for the visually impaired, call the Nuclear Waste Program at 509-372-7950. Persons with impaired hearing may call Washington Relay Service at 711. Persons with speech disability may call TTY at 877-833-6341.



Bargains

Free 3-line ad for items priced
under \$200. Call 586-6181.

Auto Savers

Vehicles \$6,000 or less, 4 lines for 14 days



Sell it fast!
Call 586-6181

Tri-City Herald
VOICE OF THE MID-COLUMBIA

Classified Legals

CITY OF PASCO NOTICE OF PUBLIC HEARING

The City Council of the City of Pasco will hold a public hearing on August 17, 2015 to discuss changes to the 2015 Operating and Capital Projects Budgets. The Council meeting will begin at 7:00 pm at Pasco City Hall at 525 N 3rd Avenue, Pasco, WA 99301.

Eva Lindgren,
Deputy Director
Administrative and
Community Services
8/2 & 8/9/2015

City of Richland

Notice of Public Hearing File No: ZC2015-109

Proponent: Hayden Homes
Proposal: Change in comprehensive plan designation for 3.6 acre site from Low Density Residential to Commercial Location: West of Steptoe Street, South of the plat of the Heights at Meadow Springs, North of future extension of Rachel Road.

Hearing: Before the Richland Planning Commission on Wednesday, August 26, 2015 at 7:00 p.m. in the Council Chambers, Richland City Hall, 505 Swift Boulevard. Contact: Rick Simon, Development Services Manager, PO Box 190, MS-35, Richland, WA 99352, rsimon@ci.richland.wa.us
#15-9053 8/2/2015

Hanford Dangerous Waste Permit

The Washington State Department of Ecology invites you to comment on a proposed change to the permit to close an outdoor container storage area next to Trench 34 at the 218-W-5 burial ground in central Hanford.

The public comment period runs from August 3, 2015 through September 18, 2015.

Why It Matters

The FS-1 outdoor container storage area is located next to Trench 34 of the Low-Level Burial Grounds in Hanford's 200 West Area. This storage area was never authorized for use through the Site-wide Permit. It has not stored waste since 2008. The Permittees have agreed through an Environmental Protection Agency issued Consent Agreement and Final Order to close it. In October 2013, the U.S. Department of Energy, Richland Operations Office submitted a Class 3 permit change request to add the FS-1 Outdoor Container Storage Area closure plan to the Site-wide Permit.

Public meeting
A public meeting is not scheduled, but if there is enough interest, we will consider holding one. To request a hearing or for more information, contact: Dieter Bohrmann, Department of Ecology, 800-321-2008, Hanford@ecy.wa.gov

The Permittees are:
United States
Department of Energy
Richland Operations Office
PO Box 550 Richland,
Washington 99352

CH2M Hill Plateau
Remediation Company
PO Box 1600 H7-30
Richland, Washington
99352

To review the proposed modification in detail beginning August 3, 2015, visit the Washington State Department of Ecology website at <http://www.ecy.wa.gov/programs/nwp/commentperiods.htm>.

You can also review the proposed modification at one of the Hanford Public Information Repositories:

Washington State
Department of Ecology
Nuclear Waste Program
Resource Center
3100 Port of Benton
Boulevard Richland,
Washington 99354
Contact: Valarie Peery
509-372-7950

United States
Department of Energy
Administrative Record
2440 Stevens Drive
Richland, Washington
99354 Contact: Heather
Childers 509-376-2530

United States
Department of Energy
Reading Room
2770 Crimson Way
Richland, Washington
99354 Contact: Janice
Parthree 509-372-7443

University of Washington
Suzzallo Library
PO Box 352900
Seattle, Washington 98195
Contact: Hilary Reinert
206-543-5597

Portland State University
Branford Price Millar Library
1875 Southwest Park
Avenue Portland, Oregon
97207 Contact: Claudia
Weston 503-725-4542

Gonzaga University
Foley Center
502 East Boone Avenue
Spokane, Washington
99258 Contact: John
Spencer 509-313-6110

Your views and concerns are important to the Washington State Department of Ecology. For more information on the public comment period, please contact Dieter Bohrmann at hanford@ecy.wa.gov or (800) 321-2008.
#15-9042 8/2/2015

Invitation for Bids KID Contract #PC 2015-41 Crushed Surfacing for KID Maintenance Roads

The Kennewick Irrigation District (KID) is seeking bids to provide up to approximately 18,000 tons of crushed surfacing base course (one and one quarter inch (1-1/4")). Crushed surfacing base course shall be in accordance with the latest edition of the State of Washington Standard Specifications (SWSS) Division 4 and SWSS Section 9-03.9(3) and as herein modified.

The bid shall be per ton of

crushed surfacing base course. The bidder shall specify the location of the crushed surfacing base course. Pick up of the material will be completed by KID crews. The start of pickup will be on award of the contract.

The project quantities shown in the proposal are only approximations and are shown to establish a basis for uniform competitive bidding. The KID reserves the right to adjust the bid quantities.

Bids shall be addressed to the Kennewick Irrigation District Board of Directors and will be received by Lori Gibson, Executive Assistant, 12 West Kennewick Avenue, Kennewick, WA, 99336, up to the hour 1:00 p.m., on Wednesday, August 5, 2015, at which time they will be opened at the Kennewick Irrigation District Office.

At the time and date stated above, the bids will be publicly opened and read aloud. Bids are to be submitted only on original forms provided in the specifications. Following receipt of a successful bid, award of the contract will proceed the week of the bid.

Technical questions regarding the scope of this project can be directed to Daniel Tisell, KID Staff Engineer at (509) 586-9111.

The KID reserves the right to reject any or all bids, to waive technicalities, to combine this contract with other contracts when considering contract awards, and to accept any bid which it deems in the best interest of the KID.
#15-9046 7/26 & 8/2/2015

NOTICE OF APPLICATION AND NOTICE OF PUBLIC HEARING Date of Notice: August 2, 2015

Notice is hereby given that the City of Pasco will be reviewing a proposal submitted by the City to adopt a new "Shoreline Master Program" (SMP; including a restoration plan and a cumulative impacts analysis), adopting a new Chapter 29.01 of the Pasco Municipal Code "Shoreline Master Program", and repeal the existing Franklin County SMP currently referenced by the City.

SEPA: The City of Pasco expects to issue a Determination of Non-Significance for this proposal, utilizing the Optional DNS Process in WAC 197-11-355. This proposal may include mitigation measures under applicable codes, and the project review process may incorporate or require mitigation measures regardless of whether an EIS is prepared. This may be the only opportunity to comment on the environmental impacts of the proposal and the proposed mitigation measures.

A copy of the subsequent threshold determination may be obtained upon request. ADDITIONAL PERMITS: No additional permits are required; however, the Washington State Department of Ecology will host an additional comment period after local adoption, and the SMP will not go into effect until Ecology adopts the document. STUDIES REQUIRED: Development of the SMP required the development of a Shoreline Inventory, Analysis, and Characterization Report, Cumulative Impacts Analysis Report, and Restoration Plan. LOCATION: City-wide, but applicable only to Columbia and Snake River for which the SMP has jurisdiction. ZONING: All zones. MITIGATION: The SMP is a program that is to be adopted by the City. Within the requirements of the SMP, mitigation measures and standards are developed for all proposed development within the shoreline master program jurisdictional waters and shorelands (typically within 200 feet of Ordinary High Water Mark).

OPEN RECORD PUBLIC HEARING: The City Planning Commission will hold a hearing at 7:00 pm on Thursday, October 15, 2015 in the City Council Chambers, Pasco City Hall, 525 N 3rd Ave. At this time, any person(s) may appear and provide testimony. Electronic copies of the Draft SMP documents and SEPA Checklist are available at the following internet location: <http://www.pasco-wa.gov/858/Shoreline-Management-Program>, as well as at the Pasco Library at 1320 W Hopkins St. A hardcopy is available for review at the City Hall, (509) 545-3441. Office hours are 8 a.m. to 5 p.m., Monday through Friday. **Comments must be submitted no later than 5:00 p.m. on 12 October, 2015 by mail to PO Box 293, 525 N. 3rd Ave., Pasco, WA 99301; or by email to ADAMSJ@pasco-wa.gov and vshinerickson@anchoragea.com; or delivered to City Hall. All comments should be as specific as possible and mailed, emailed, or hand delivered. Any person has the right to comment, receive notice, participate in any hearings, request a copy of the final decision, and appeal the decision as provided by law and City Code. This may be the only opportunity to comment on the above listed materials.**
#15-9055 8/2/2015

NOTICE OF PUBLIC HEARING

PLEASE TAKE NOTICE that Elizabeth Hernandez filed a petition (HE2015-003) requesting a variance to Iron yard fencing regulations on the following described property:
Legal: Lot 18, Phase 2,
Casa Del Sol Division II

Address: 4503 Catalonia
Drive, Pasco WA



THEREFORE, LET ALL CONCERNED TAKE NOTICE that a Public Hearing will be held by the Hearing Examiner of the City of Pasco, Washington, in the City Council Chambers, Pasco City Hall, 525 North 3rd Avenue at the hour of 3:30 p.m., Wednesday, August 12, 2015, so that all concerned may appear and present testimony on the matter.

State law permits only one open record public hearing on this matter. This will be the only opportunity to provide input on this issue. For additional information, please contact the Pasco City Planner at (509) 545-3441.

David I. McDonald
Planning Commission
Secretary Pasco,
Washington
#15-9035 8/2 & 8/9/2015

Notice of Surplus Equipment

Notice is hereby given, as required by RCW 28A.335.180, the Educational Service District #123 Board of Directors declared equipment, materials and furniture surplus to the July 30, 2015 meeting. These surplus items will be available to any public or private school district in Washington at depreciated cost of fair market value, whichever is greater. A listing of the items is available at ESD #123 offices @ 3918 W. Court St, Pasco, WA, 99301; as well as information and bid sheets. Final date to accept bids from public or private school districts will be August 31, 2015 @ 2:00 pm. Remaining items will be available to the general public after this date.

#15-9052 8/2/2015

PORT OF PASCO NOTICE OF ACCEPTANCE OF WORK TRI-CITIES AIRPORT TAXIWAY A PAVEMENT MAINTENANCE

At a regular meeting held on July 23, 2015, the Port of Pasco accepted the work competed on the Taxiway A Pavement Maintenance. Under the contract entered into with Stripe Rite Inc. Pursuant to RCW 39.08.030, the statutory period for filing of all liens and claims against the retained percentage of payment to the contractor becomes effective on the above date.
#15-9054 8/2/2015

To Place Your Legal Announcement, Call 582-1560

JUNE 25, 2015 – HANFORD-INFO LISTSERV ADVANCE NOTICE

Subject: [Notice of temporary authorization request for pending proposed permit modification for the FS-1 Outdoor Container Storage Area](#)  Reply
From: "TPA" <TPA@RL.GOV>
Reply-To: DOE1@RL.GOV
Date: Thu, 25 Jun 2015 18:27:59 +0000
Content-Type: multipart/alternative
Parts/Attachments:  [text/plain](#) (20 lines) , [text/html](#) (98 lines)

This is a message from the U.S. Department of Energy

The U.S. Department of Energy (DOE) is requesting Washington Department of Ecology (Ecology) grant a 180-day **temporary authorization** to allow for work to continue prior to the approval of the proposed modification to the Hanford Facility Dangerous Waste Permit. This notice is for information purposes only and is required by Washington Administrative Code (WAC) 173-303-830(e).

The proposed modification, known as a Class 3 modification, accelerates closure activities relating to the FS-1 Outdoor Container Storage Area (hereafter referred to as FS-1) to comply with a Consent Agreement and Final Order between the DOE and the U.S. Environmental Protection Agency. The permit modification request went out for public comment from October 30, 2013 to January 6, 2014. Another opportunity for the public to comment will take place when Ecology issues the draft permit.

To ensure continuation of key activities while the modifications are pending, DOE is requesting Ecology grant the **temporary authorization** to proceed with closure activities relating to FS-1.

Information on the requested modification can be found on Ecology's website: <http://www.ecy.wa.gov/programs/nwp/PL/pages/closedcommentperiods.htm> and navigating to the section labeled "Closing Parts of Low-Level Burial Grounds (LLBGs) 31, 34, and 94; Central Waste Complex and Waste Receiving and Processing Facility (CWC-WRAP); and T Plant" or by contacting: Kristen Skopeck, DOE-RL, at (509) 376-5803, or Nina Menard, Washington Department of Ecology, at (509) 372-7950.

AUGUST 3, 2015 – HANFORD-INFO LISTSERV NOTICE

This is a message from the Washington Department of Ecology

Ecology invites you to comment on a proposed change to Hanford's Dangerous Waste Permit. The proposed modification is to close the FS-1 Outdoor Container Storage Area next to Trench 34 at the 218-W-5 burial ground in central Hanford. The public comment period starts today and runs through September 18, 2015.

Why It Matters

The FS-1 outdoor container storage area is next to Trench 34 of the Low-Level Burial Grounds in Hanford's 200 West Area. This storage area was never authorized for use through the Hanford Permit. It has not stored waste since 2008.

The Permittees have agreed through a U.S. Environmental Protection Agency-issued Consent Agreement and Final Order to close it. In October 2013, the U.S. Department of Energy Richland Operations Office submitted a Class 3 permit change request to add the FS-1 Outdoor Container Storage Area closure plan to the Hanford Permit. This comment period is the second portion of the Class 3 modification.

Public meeting

A public meeting is not scheduled, but if there is enough interest, Ecology will consider holding one. To request a hearing or for more information, contact:

Dieter Bohrmann
Department of Ecology
800-321-2008
Hanford@ecy.wa.gov

The Permittees are:

[United States Department of Energy](#)

Richland Operations Office
PO Box 550
Richland, Washington 99352

[CH2M Hill Plateau Remediation Company](#)

PO Box 1600 H7-30
Richland, Washington 99352

To review the proposed modification in detail, visit Ecology's website at <http://www.ecy.wa.gov/programs/nwp/commentperiods.htm>. You can also review the proposed modification at one of the [Hanford Public Information Repositories](#).

Your views and concerns are important to Ecology. For more information on this public comment period, please contact Dieter Bohrmann at hanford@ecy.wa.gov or 800-321-2008.

Appendix B: Copies Of All Written Comments



September 18, 2015

John Temple
Washington State Department of Ecology
3100 Port of Benton Blvd.
Richland, Washington 99354
E-mail address: hanford@ecy.wa.gov
E-mail address: jtem461@ecy.wa.gov

RE: YN ERWM PROGRAM (YN) comments on the Class 3 Modification to the Hanford site RCRA Permit for Closure of the FS-1 Outdoor Container Storage Area and Closure Plan and State Environmental Policy Act checklist for the Hanford Facility FS-1 Outdoor Container Storage Area Closure.

The Confederated Tribes and Bands of the Yakama Nation appreciate the opportunity to review and provide comments on these documents. Attached are our general and specific comments and requests for changes to the draft FS-1 Outdoor Container Storage Area Closure Plan and State Environmental Policy Act checklist for the Hanford Facility FS-1 Outdoor Container Storage Area Closure.

The Confederated Tribes and Bands of the Yakama Nation is a federally recognized sovereign pursuant of the Treaty of June 9, 1855 made with the United States of America (12 Stat. 951). The U.S. Department of Energy Hanford site was developed on land ceded by the Yakama Nation under the 1855 Treaty with the United States. The Yakama Nation retains reserved rights to this land under the Treaty.

We look forward to discussing our concerns.

Sincerely,


f Russell Jim
Yakama Nation, ERWM Program Manager

cc:

Stacy Charboneau, Manager, Richland Operations Office, US Department of Energy
Ken Niles, Oregon Department of Energy
Stuart Harris, CTUIR
Gab Bohnee, Nez Perce
Marlene George, YN ERWM
Administrative Record

Attachment:

YN ERWM PROGRAM (YN) comments on the Class 3 Modification to the Hanford site RCRA Permit for Closure of the FS-1 Outdoor Container Storage Area and Closure Plan and State Environmental Policy Act checklist for the Hanford Facility FS-1 Outdoor Container Storage Area Closure.

Factsheet & Focus sheet:

YN previously suggested inclusion of the required WAC 173-303-830(4)(c)(ii)(F) statement: "The permittee's compliance history during the life of the permit being modified is available from the department of ecology contact person." YN previously suggested Ecology includes active hyperlinks to referenced documents (e.g., U.S. Department of Energy U.S. Environmental Protection Agency Docket Number: RCRA-10-2013-0113 Consent Agreement and Final Order-CAFO). Neither of these was done. YN believes to have informed public comment, all relevant information or links to this information should be included in the Factsheet/Focus sheet. There is no way to verify your statements as to the alleged violation or settlement requirements. YN requests in the future, for Ecology's publication of draft permitting documents for the other RCRA units involved in the CAFO (T-Plant 271 T cage; T-Plant 211 T pad; T-Plant 221 T sand filter pad; T-Plant 221 T - R5 waste storage area; T-Plant 277T outdoor storage area; Central Waste Complex ("CWC") outside storage A; CWC outside storage area B) please make this information available for public review and understanding of issues in their entirety.

YN requests Ecology ensure all hyperlinks to referenced documents are active and the Part A form is available.

FS-1 Outdoor Container Storage Area Closure Plan 1:

General Concerns:

- YN finds it somewhat alarming that this area should function as an un-authorized, non-permitted container storage area (aka illegal storage of wastes) for such a long period without Ecology's recognition. There should be no future such instances of this type of violation activities on the Hanford Site and the YN request clarification as to how this will be ensured.
- WAC 173-303-806 states the requirements for final facility permit applications including Part A forms & Part B information. All this information was and remains vitally important for proper operations and/or closure of any treatment, storage, or disposal (TSD) unit under the RCRA permit, public understanding of the process of closure of a RCRA TSD unit, and protection of human health and the environment. Unfortunately, for this unit (and remaining CAFO units) none of which has been approved through the Dangerous Waste Permitting process. WAC 173-303-806(4)(b) lists the required information specific to use and management of containers/container storage areas. The unit was obviously not designed/constructed in compliance with WAC 173-303-630 requirements. YN believes this should be acknowledged and the information included in the Factsheet/Focus sheet and Closure Plan.
- Upon review, the simplistic approach in the Closure Plan (and the Permit Conditions) falls short of providing the required information necessary for Ecology to establish permit conditions (or maintain compliance with) the Hazardous Waste Management Act and WAC 173-303. Each permit issued under this chapter must contain terms and conditions as the director determines necessary to protect human health and the environment. YN believes there are portions of the requirements for operating units

that are valuable to tailor to, and incorporate details into the closure of the FS-1. As currently written, there is approximately four pages to describe in detail Closure Activities, Personnel Training Preparedness/Contingency Planning, and Inspection Plan and procedures. One cannot credibly determine compliance with WAC 173-303-610 requirements to have a detailed, complete closure plan (which should and does not, include a specifically detailed closure activity schedule with complete removal of wastes in 180 days) given the limited details presented in this Closure Plan. All these plans should be directed towards the ongoing cleanup closure/post-closure actions (e.g., inspections should be on a weekly basis at a minimum.) YN believes and requests the Closure Plan be a standalone document with detailed Appendices to include this information

- YN notes the Closure Plan does not discuss how non-TSD unit constituents (should they be discovered during closure sampling) will be addressed through the *Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA)* past practice processes identified in the Tri-Party Agreement (Section 7.0). YN requests inclusion of this information (and potential radionuclide contaminants of concern) in the Introduction for document continuity and comprehensive public understanding of the entire system processes. YN suggests inclusion of the following could clarify concerns regarding radiological contamination in relationship to RCRA closure requirements : *Where information regarding treatment, management, and disposal of the radioactive source, byproduct material, and/or special nuclear components of mixed waste (as defined by the Atomic Energy Act of 1954, as amended) has been incorporated into this permit, it is not incorporated for the purpose of regulating the radiation hazards of such components under the authority of this permit and chapter 70.115 RCW. However, it is anticipated remedial actions for radioactive constituents shall be consistent with the closure activities required under WAC 173-303.*
- YN notes there is no discussion of Cultural Resources or any potential impacts. We recognize this is not covered under WAC 173-303 permitting requirements, yet it remains an issue for the overall site remediation. YN requests consultation regarding our concerns.
- YN notes in the *Matter of: U.S. Department of Energy U.S. Environmental Protection Agency Docket Number: RCRA-10-2013-0113 Consent Agreement and Final Order, in settlement of the violations alleged in Part III, "Respondent shall immediately comply with all applicable final facility standards for the management of dangerous waste identified at WAC 173-303-600(1) for the units identified above in Paragraph 3.11 including, but not limited to, the following requirements: general waste analysis at WAC 173-303-300, security provisions at WAC 173-303-310, general inspections at WAC 173-303-320, personnel training at WAC 173-303-330, preparedness and prevention at WAC 173-303-340, contingency plan and emergency procedures at WAC 173-303-350, and use and management of containers at WAC 173-303-630. Respondent shall continue to comply with these requirements until closure of the units has been completed, or until the units become authorized under a permit for the treatment, storage, and or disposal of dangerous waste in which case Respondent shall comply with the applicable permit requirements."* These have not been completed as of September 2105. YN requests an explanation of the path forward into compliance for these other CAFO units.

Comments: Specific Sections:

HA1 Introduction:

- YN questions the inclusion of Addendum H1 and requests this information be identified on a Part A form per WAC 173-303 requirements and that the Part A form be included as an Attachment to the Closure Plan.
- The introduction does not mention that there is environmental information related to this unit (i.e. 218-W-5; Trench 34) contained DOE/RL-2004-60, Draft B Radioactive Landfills Group Operable Unit RCRA Facility Investigation/Corrective Measures Study/Remedial Investigation/Feasibility Study Work Plan *and* groundwater data contained in the Hanford Environmental Information System (ISIS). YN requests inclusion of this information (and radionuclide contaminants of concern in the adjacent Trench 34 waste site and its groundwater unit) in the Introduction for document continuity and comprehensive public understanding of the entire RCRA LLBG disposal processes.
- YN requests deletion of portion of line #8; *"and represents the baseline for closure and the enforceable compliance requirements for conducting closure."* Closure plans must comply with the WAC 173-303-610 requirements; closure plans do not 'simply represent a baseline for closure' as stated. WAC 173-303-610(3)(iv thru vi) requires more information and details which are not included in this document.

Section HA1.1:

- YN requests inclusion of reference citation for the radiological survey performed, maximum results, and identification of background comparison levels.
- WAC 173-303-806 states the requirements for final facility permit applications including Part A forms & Part B information. YN requests that a completed Part A form be included in the Closure Plan to verify maximum waste inventory, etc. See comment above regarding Addendum H1.
- YN suggest checking calculations of total storage area to confirm 1125 yd²=966m². Edit Summary of Sampling Design table in Appendix HA.b as needed.

Section HA2:

- YN disagrees with statements in line #s 10 that appearance of the land should be consistent with future land-use determinations for adjacent portions of the 200 Areas as an industrial-exclusive portion of the Hanford Site. YN disagrees with leaving the gravel as it more than likely to be used inappropriately as a staging area for wastes and potential soil contamination. We request removal and revegetation of the site.

Section 2.1.:

- YN requests edits to line 20: YN agrees Use of MTCA Method B an unrestricted use standard is appropriate, however we disagree the statement that the "numeric cleanup levels have been calculated according to the requirements ...as of the effective date of the permit modification." Ecology should not backslide from any earlier, more stringent cleanup levels listed in earlier versions of CLARC or under the various interim records of decision for the Hanford site. YN ERWM PROGRAM and public stakeholder response has consistently requested Ecology to ensure this does not happen. YN requests Ecology use its Omnibus Authority per the WAC to ensure no lessening of cleanup standards for the closure of this unit (and subsequent units covered under the CAFO).
- YN requests the Permittee define the model being used under WAC 173-340-747.
- YN requests cleanup levels are identified. YN requests clarification as to why there is no proposed cleanup levels identified in the Closure Plan or in the conditions.
- YN requests clarification and editing to reflect that both soils and gravels will be sampled. Sampling must be at a depth protective of human health and the environment.

Section HA3:

- YN requests additional details. YN requests the Closure Plan for the FS-1 facility incorporate the required WAC 173-303 information in detail for the following:
Personnel Training Plan (In accordance with WAC 173-303-330.): Please ensure the following trainings/requirements are included as well:
 - Training related to equipment type [e.g., sampling equipment, operational procedures and equipment maintenance] relevant to task performed.
 - For Samplers: Additional training in collecting, packaging & shipping of samples to field & off-site labs (including special requirements for collecting and packaging samples containing volatile organic materials that require acid preservatives or special filtering) and chain of custody procedures.
 - Edit Table HA-1 to include requirement for sampler to have emergency response training.

Preparedness and Prevention Plan (In accordance with WAC 173-303-340).

Inspection Plan (In accordance with WAC 173-303-320.): Please ensure the following information/requirements are included as well:

1. Review of daily operating logbooks (including spill information) during closure activities.
2. Inspection of erosion damage & vegetative cover; to include looking for evidence of animal/pest intrusion such as anthills, termite nests, animal burrows, bird nests, water erosion, etc., that might spread contamination.
3. Replacement procedures for emergency & monitoring equipment to include checking for proper location of these (e.g., air monitoring equipment).
4. Surface inspections/security inspections; to include looking for damages to security postings; incorrect barriers, unidentified containers or hazardous wastes, site is free of obvious safety hazards, an evidence of spills or releases, etc. YN has requested no temporary placement of containers, however, should this be allowed, YN requests the information regarding container management to be included in the Inspection Plan.

Contingency Plan/Contingent Post Closure Plan (to include a groundwater monitoring plan) (In accordance with WAC 173-303-650(6)(c)(i).).

Sections HA3.1 & HA3.5:

- Inadequate, as currently written, there are approximately three pages (Section HA3.1 pg. H-8 & HA3.5 pg 12) to describe in Personnel Training and what is understood to be intended as the Inspection Plan. Furthermore, advising the reader to "refer to the LLBG Trenches 31-34-94 DWTP" or Attachment 5 while unavailable via attachments or hyperlinks is inappropriate.

Section HA3.2:

- YN requests inclusion of an explanation of the process of sending RCRA wastes to ERDF if this is to be considered as an option for closure of the FS-1.
- Preparedness and Prevention/Contingency Plans are lacking. Text in lines 11-14, pg. HA-10, 18-28, pg. HA-12 & lines 1-6, pg HA-13 certainly cannot be considered sufficient if these indeed are to be taken as representing contingency planning.

Section HA3.5:

- YN requests more detailed description of how WAC 173-303-310 requirements are to be met.

- YN requests inclusion of the following text in addition to edits to Section HA3.5: *Signs will be posted at public access points to FS-1 protected area stating, NO TRESPASSING. SECURITY BADGES REQUIRED BEYOND THIS POINT. AUTHORIZED VEHICLES ONLY. PUBLIC ACCESS PROHIBITED, or an equivalent legend. In addition, warning signs stating DANGER--UNAUTHORIZED PERSONNEL KEEP OUT, or an equivalent legend will be posted at all entrances to the unit. These signs are, or will be, written in English, legible from a distance of 7.6 meters, and visible from all angles of approach.*

Section HA 3.7:

- YN requests additional details: Examples: How the nature and extent of contamination will be evaluated; potential types of equipment; detail of equipment decontamination; how additional sampling efforts will be conducted; details to demonstrate compliance with the regulations stated.
- YN requests additional information in Section HA3.7 as to how treatment (if needed) to meet WAC 173-303-140 (LDRs) will be performed.

Section HA3.8:

- YN requests addition to section HA3.8, line #8 text to state: "Clean closure must demonstrate *(and include documentation)* that unit operations did not adversely affect soils *and that groundwater has not been adversely impacted, as described in WAC 173-303-645.*"
- YN disagrees with leaving a gravel surface at waste site. YN requests additional information regarding Ecology's pre-determined decision to leave a gravel surface in place at the FS-1 site. Please also provide information as to potential use of site and the permitting approach to be followed.

Section HA3.9:

- YN requests edits to Table HA-7: Soil Analytical Performance Requirements Practical Quantization Limits:
 - Establish a separate PQL for Hexavalent Chromium: Current limit exceeds Ecology's preference of 0.19mg/kg in soils to be protective of groundwater.
 - Edit Silver for consistency with Table 2-2 (DOE/RL-2009-60, REV. 1-200-MG-1 OU SAP): 0.2mg/kg
 - Edit Polychlorinated Biphenyl for consistency with Table 2-2:0.017

HA3.9.5:

- YN requests identification of MCTA Method B equation to be used and rationale. Please also edit Section HA3.9.13 as needed.

HA3.9.12:

- YN requests all sampling and analysis records, data, documents be maintained in the FS-1 unit files as well as the Administrative Record.

HA3.9.13:

- YN suggests edit to line 9 (and elsewhere) to read Table HA-7.

HA3.10:

- YN requests edits to line 19 or deletion; without completion of all sampling and confirmation that results support clean closure, the IQRPE report would be invalid.
- YN requests the minimum field activities and documents reviewed by the IQRPE include all the supporting documentation listed on page HA-8. The IQRPE should have a thorough understanding of closure activities.

HA3.11:

- YN requests edits to line 33 to delete the following text: *Upon request by Ecology*. The intent of this regulation is to ensure Ecology has all the information necessary to determine the IQRPE's certification is complete, not to have to ask the Permittee to provide the information. The financial obligations are not relevant to the Hanford site.
- YN requests definition of what entails "minor deviations from the approved closure plan" be included in Closure plan and request a Permit Condition requiring the Permittee provide Ecology the justification for deviations within 7 days for Ecology's review and determination appropriateness of deviation or if additional sampling is warranted.

HA3.12:

- YN has previously noted disagreement with leaving gravel in place and disputes non-restoration of the area. YN requests additional descriptive text to discuss the non-use of this area as a waste facility location.

HA4:

- YN notes Ecology has already provided DOE a temporary authorization for 180 days. Is the purpose of this section to allow an additional 180 days for closure? YN requests clarification within this section, in the Introduction section.
- YN requests Table HA-9 be edited to reflect dates, activities, etc in more detail.

Attachments HA.a & HA.b:

- YN requests, if possible, an Ecology staff inspector perform a walk-down of the FS-1 site to verify statements as to the no observation of staining.
- YN notes the Inspection Checklist Review form dated July 31, 2013 contains language appearing to allow extended time periods from the required weekly dates. YN requests Ecology thoroughly review the inspection process for the FS-1,ther CAFO units, and the site in general where containers are stored/managed for potential permit violations.
- YN notes the identification of a container, which required re-packaging, and requests Ecology review this incident and determine if there was a violation.

General YN comment regarding sampling: YN requests Ecology ensure the information/approach presented in the Closure Plan meets or exceeds the following: YN request Sampling and Analysis Plan(s) [per WAC 173-303-610(3)(a)(v)] be consistent with Ecology Publication #09-05-007 [Guidance for Preparing Waste Sampling and Analysis Documents and QA/QC Requirements at Nuclear Waste Sites] and include the following:

- Documentation of the necessary quantity and quality of data for each decision for which sampling and analysis may be required pursuant to conditions of this Chapter. [WAC 173-303-300(1)]
- The parameters for which each environmental media sample will be analyzed and the rationale for selecting these parameters and the frequency with which analysis of a waste will be reviewed, or repeated, to ensure that the analysis is accurate and current. [WAC 173-303-300(5)(a)]
- Procedures for how non-detects, and any tentatively identified compounds which may be reported with laboratory analytical results will be assessed and/or used for decision-making purposes, and to identify any contaminants in addition to those already identified for which establishment of closure performance standards may be warranted. [WAC 173-303-300(5)(a)]
- Analytical methods, including field measurements, which will be used for analysis of environmental media samples. [WAC 173-303-300(5)(b)]

- Methods of obtaining representative samples of soils for all sampling and analysis, which may be, required pursuant to WAC 173-303-110 requirements and consistent with the requirements specified in WAC 173-340-810 and WAC 173-340-820. [WAC 173-303-300(5)(c)]
- A quality assurance/quality control (QA/QC) plan, or equivalent, to document all monitoring procedures 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 as defined. Each QA/QC plan shall contain a Data Quality Assurance Plan which includes the following:
 - Data Collection Strategy section including, but not limited to, the following:
 - A description of the intended uses for the data, and the necessary level of precision and accuracy for those intended uses; and,
 - A description of methods and procedures to be used to assess the precision, accuracy, and completeness of the measurement data;
 - Sampling section, this shall include or describe, and reference or cite:
 - Criteria for selecting appropriate sampling locations, depths, etc., or identification and justification of sample collection;
 - Sampling methods including the identification of sampling equipment and a description of decontamination procedures to be used;
 - 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 Data Quality Objective (DQO) planning process;
 - Methods for, or specification of, measuring all necessary ancillary data;
 - 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;
 - Criteria for, or specification of, identifying the type of sampling (e.g., discrete), and number of samples to be collected;
 - Criteria for, or specification of, measures to be taken to prevent contamination of the sampling equipment and cross contamination between sampling points;
 - Methods and documentation of field sampling operations and procedure descriptions, as appropriate, including:
 - Procedure descriptions and forms for recording the exact location, sampling conditions, sampling equipment, and visual condition of samples;
 - Calibration of field devices (as applicable);
 - Collection of replicate samples;
 - Submission of field-biased blanks, where appropriate;
 - Potential interferences present at the facility;
 - Field equipment listing and sample containers;
 - Sampling order; and,
 - Descriptions of decontamination procedures.
 - Selection of appropriate sample containers, as applicable;
 - Sample preservation methods, as applicable; and,

- Chain-of-custody procedure descriptions as applicable, including:
 - Standardized field tracking reporting forms to establish sample custody in the field prior to, and during shipment; and,
 - 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.
 - 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;
 - Provision for a laboratory sample custody log; and,
 - Specification of chain-of-custody procedures for sample handling, storage, and disbursement for analysis.
 - Sample storage procedure descriptions and storage times;
 - Sample preparation methods;
 - Descriptions of analytical procedures, including:
 - Scope and application of the procedure;
 - Sample matrix;
 - Potential interferences;
 - Precision and accuracy of the methodology; and,
 - Method detection limits.
 - Descriptions of calibration procedures and frequency;
 - Data reduction, validation, and reporting;
 - Internal laboratory quality control checks, laboratory performance, and systems audits and frequency, include:
 - Method blank(s);
 - Laboratory control sample(s);
 - Calibration check sample(s);
 - Replicate sample(s);
 - Matrix-spiked sample(s);
 - “Blind” quality control;
 - Control charts;
 - Surrogate samples;
- Each QA/QC plan to include a Data Management Plan, or equivalent, to document and track data and results.[WAC 173-303-380(1)(f)]. This plan should 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 should be identified. The plan should also provide the format to be used to record and, for projects, present the validated and invalidated data and conclusions.
- The Data Management Plan should include the following as applicable:
 - A data record including the following:
 - Unique sample or field measurement code;
 - Sampling or field measurement location including surveyed horizontal coordinates and elevation of the sample location, and sample or measurement type;
 - Sampling or field measurement raw data;

- Laboratory analysis identification (ID) number;
- Result of analysis (e.g., concentration);
- Tabular displays, as appropriate, illustrating:
 - Unsorted validated and invalidated data;
 - Results for each medium and each constituent monitored;
 - Data reduction for statistical analysis;
 - Sorting of data by potential stratification factors (e.g., location, soil layer, topography); and,
 - Summary data.
- 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:
 - Displays of sampling location and sampling grid;
 - Identification of boundaries of sampling area and areas where more data is required;
 - Displays of concentrations of contamination at each sampling location;
 - Displays of geographical extent of contamination;
 - Aerial and vertical displays of contamination concentrations, concentration averages, and concentration maxima, including isoconcentration maps for contaminants found in environmental media at the Facility;
 - Illustrations of changes in concentration in relation to distance from the source, time, depth, or other parameters;
 - Identification of features affecting intramedia transport and identification of potential receptors;
- All data obtained should be made available to Ecology within forty-five (45) days of receipt or after completion of QA/QC activities, if applicable.

YN comments on: PART V, CLOSURE UNIT GROUP 4 CONDITIONS 1 FS-1 OUTDOOR CONTAINER STORAGE AREA: As currently drafted, these permit conditions for closure of the FS-1 waste management unit fail to meet the requirements of WAC 173-303-815 (2).

- YN requests edits to V.4.B.1 to state: Once the closure plan is incorporated into Addendum H through the permit modification process, the Permittees will close the FS-1 according to the requirements in Addendum H. The Permittees will comply with all requirements set forth in the Addendum H, Closure 37 Plan for the FS-1 OCSA, and close the FS-1 OCSA in accordance with the Addendum H, 38 Closure Plan. [WAC 173-303-610(3)(a)]
- YN requests Condition V.4.B.2 be deleted and the appropriate Conditions written to implement the WAC requirements for SAP, and Certification, etc.
- **YN requests Ecology draft the following Permit Conditions for closure of the FS-1.** Suggested text is provided for Ecology consideration in drafting of conditions. (Note YN does not know current Part I & II condition numbers and suggest these also be referenced along with WAC 173-303 requirements):
 1. The closure plan and sampling and analysis plan will meet the applicable closure and post-closure requirements of WAC 173-303-610 and WAC 173-303-630(10) pursuant to the requirements of this Chapter.
 2. The closure plan submitted pursuant to V.9.B.1 will specify dangerous constituents and

corresponding closure performance standards to meet the requirements of WAC 173-303-610(2)(b)(i) for soils affected by the operations associated with this unit.

3. **Closure Performance standards** for soils will satisfy the most stringent (lowest) cleanup level or standard of WAC 173-340, Model Toxics Control Act (MTCA) Cleanup Regulation. The numeric cleanup levels for soils will be calculated according to the MTCA cleanup methods described in WAC 173-340-700 through WAC 173-340-760. [WAC 173-303-283] or use the following:

Closure of a RCRA TSD facility is described in these Dangerous Waste Regulations under WAC 173-303-610. WAC 173-303-610(2)(b)(i) requires for soils, groundwater, surface water, and air, the numeric cleanup levels calculated using residential exposure assumptions according to the Model Toxics Control Act Regulations (MTCA), chapter 173-340 WAC, as now or hereafter amended. Primarily, these will be numeric cleanup levels calculated according to MTCA Method B, although MTCA Method A may be used as appropriate (industrial use land).

To ensure compliance with the Dangerous Waste Regulations, include the following closure performance standards for contaminated soils:

- Closure performance standards for soils will satisfy the most stringent (lowest) of: [WAC 173-303-610(3)(a)(v)]
 - Direct contact consistent with WAC 173-340-900 (Table 745-1),
 - Soil concentrations to protect groundwater: derived using WAC 173-340-747(4),
 - Protection of ecological receptors achieved through one of the following methods:
 1. Excavation of contaminated soil to a minimum of 15 feet below ground surface, or
 2. Excavation of contaminated soil such that residual soil concentrations do not exceed ecological screening levels listed in WAC 173-340-900 (Table 749-1), or
 3. A site-specific demonstration that remedial standards eliminate threats to ecological receptors.
4. **General Waste Management Requirements:** All waste analysis required by this chapter will be conducted according to the approved sampling and analysis plan.
 - No temporary placement of containers is allowed in the FS-1 unit.
 5. **Modifications:** Changes to the analytical methods used in this permit will require prior Ecology approval according to WAC 173-303-830, Permit Changes.
 6. **Recordkeeping and Reporting:** The Permittees will place documentation of all work conducted pursuant to this Chapter including results of all monitoring, testing, or analytical work and associated quality assurance and quality control data in the Hanford Facility Operating Record, as required by Permit Condition II.I.2. [WAC 173-303-380].
 7. **Security:** The Permittees will post signs at access points to the FS-1 stating the following (or an equivalent legend): Danger – Unauthorized Personnel Keep Out. These signs will be written in English, legible from a distance of 7.6 meters (25 feet), and visible from all angles of approach. [WAC 173-303-310]
 8. **Preparedness and Prevention:** Within 30 days of approval of FS-1 Permit Conditions, the Permittee shall submit to Ecology a permit modification for inclusion of a Preparedness and Prevention plan into the Closure Plan[WAC 173-303-340]
 9. **Personnel training:** The Permittees will comply with the training requirements as described in Permit Condition II.C (Personnel Training), Permit Attachment 5 (Hanford

Facility Personnel Training Plan), and Addendum H Closure Plan for the FS-1[WAC 173-303-330].

- The Permittee will comply with the following trainings/requirements as well:
- Training related to equipment type [e.g., sampling equipment, operational procedures and equipment maintenance] relevant to task performed.
- For Samplers: Additional training in collecting, packaging & shipping of samples to field & off-site labs (including special requirements for collecting and packaging samples containing volatile organic materials that require acid preservatives or special filtering)and chain of custody procedures.

10. **Contingency plan and emergency procedures:** Within 30 days of approval of FS-1 Permit Conditions, the Permittee shall submit to Ecology a permit modification for inclusion of a Contingency Plan and Emergency Procedures Plan into the Closure Plan[WAC 173-303-350]
11. **Inspections:** Within 30 days of approval of FS-1 Permit Conditions, the Permittee shall submit to Ecology a permit modification for inclusion of Inspection plan/schedule into the Closure Plan[WAC 173-303-320]. The Permittee will follow the inspection schedule until closure of the unit. Inspections shall be at a minimum of a weekly schedule. In the event of any potential threats to human health or the environment [spills or discharges], the Permittee will and remedy the problems and notify Ecology.
 - The Permittee will comply with the following information/requirements as well: Inspection of erosion damage & vegetative cover; to include looking for evidence of animal/pest intrusion such as anthills, termite nests, animal burrows, bird nests, water erosion, etc., that might spread contamination.
 - Replacement procedures for emergency & monitoring equipment to include checking for proper location of these (e.g., air monitoring equipment).
 - Surface inspections/security inspections; to include looking for damages to security postings; incorrect barriers, unidentified containers or hazardous wastes, site is free of obvious safety hazards, an evidence of spills or releases, etc.

YN comments on : State Environmental Policy Act checklist for the Hanford Facility FS-1

Closure: YN notes Ecology has presented a final determination mitigated nonsignificance (MDNS) without consideration of public comments. We request clarification on the determination of the MDNS process.

1. YN requests inclusion of the following in the Description of proposal section:
 - a. This SEPA Environmental Checklist is being concurrently prepared with a closure plan [FS-1 Outdoor Container Storage Area Closure Plan-Addendum HA] prepared in accordance with Washington Administrative Code (WAC) 173-303 Dangerous Waste Regulations.
 - b. Citation reference WAC 197-11-960.
2. YN requests edits to #8 to include the following information: Environmental information related to FS-1 is contained in DOE/RL-2004-60, Draft B Radioactive Landfills Group Operable Unit RCRA Facility Investigation/Corrective Measures Study/Remedial Investigation/Feasibility Study Work Plan *and* groundwater data contained in the Hanford Environmental Information System (ISIS). YN requests inclusion of this information (and radionuclide contaminants of concern in the adjacent Trench 34 waste

- site and its groundwater unit) in the Introduction for document continuity and comprehensive public understanding of the entire RCRA LLBG disposal processes.
3. YN requests edits to #9 to include the following information: DOE/RL has forwarded the aforementioned FS-1 Closure Plan to Ecology.
 4. YN requests edits to #11 to include the following information needed to achieve clean closure:
 - a. Remove all dangerous, mixed and TSCA-PCB LLW waste inventory.
 - b. Review waste container storage, operating, and inspection records
 - c. Perform a visual inspection of gravel and visible surface soil (completed; see Section HA3.3).
 - d. Resample, as necessary, to confirm that MTCA (WAC 173-340) Method B clean-closure levels have been met.
 - e. Transmit closure certification to the Washington State Department of Ecology (Ecology).
 5. Environmental elements:
 - Air:
 - #a: YN requests additional text: Dust from demolition activities will be generated.
 - #c: YN requests more information regarding visible dust emissions from active demolition activities, water usage for dust suppressions, etc.
 - Energy and Natural Resources
 - #a: YN requests inclusion of following: Fossil fuel will be used in vehicles to access the site, conduct demolition, and remove waste.
 - Environmental Health:
 - #a: Please include additional information as to whether there are any known or possible contamination at the site from present or past uses.; the existing hazardous chemicals/conditions that might affect the project development and design, including underground hazards , etc.; describe any toxic or hazardous chemicals which might be stored, used,, or produced during the project.
 - Historical and cultural preservation:
 - YN requests a much more complete explanation of the Cultural Resources Reviews within the 200 Areas of the Hanford site and the methods used to assess the potential impacts to the cultural and historic resources on or near the project site.