

**PART III OPERATING UNIT GROUP 16 CONDITIONS****400 Area Waste Management Unit**

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**UNIT DESCRIPTION**

The 400 Area Waste Management Unit (WMU) is located within the Fast Flux Test Facility (FFTF) Property Protected Area (PPA) in the 400 Area of the Hanford Facility. The 400 Area WMU consists of two container storage units as follows:

- Fuel Storage Facility (FSF, Building 403). The FSF is a reinforced concrete substructure covered by a steel frame metal-sided high bay building. Building dimensions are 34 x 27 x 12 meters (112 x 90 x 40 feet). The container storage unit is the ground-level floor of the building. Two large steel boxes containing sodium-contaminated Core Component Pots (CCPs) are in storage in the FSF as of the effective date of this permit. While the FSF is physically capable of accommodating additional containers of mixed waste, any additional wastes that may be accepted for storage within the 400 Area WMU are anticipated to be placed in the Interim Storage Area.
- Interim Storage Area, 4718 (ISA) (including Building 432A). The ISA consists of 156 x 247 meters (513 x 247 feet) totally fenced area with perimeter lighting that has been designated for above ground dry cask storage of spent fuel. A concrete pad located within the ISA, which measures 27 x 37 meters (90 x 120 feet), was used for dry cask storage, but will not necessarily be used for mixed waste management. The remainder of the ISA surface is gravel. The ISA is generally flat, but graded to drain in accordance with the general drainage plan for the FFTF PPA. One structure, is open on the east side, and is located on the west fence line of the ISA, but will not be used for mixed waste management.

The location of each storage unit is shown on the scale map contained in Addendum A. The mixed waste stored in these two container storage units is limited exclusively to debris (e.g., piping, equipment, and components) contaminated with elemental sodium and sodium hydroxide (D002). This waste stream is designated as (D001, D003, and WSC2). Neither bulk metallic sodium nor bulk sodium hydroxide will be stored or otherwise managed in the FSF or the ISA.

**LIST OF ADDENDUMS**

Addendum A	400 Area WMU Part A Permit Application
Addendum B	400 Area WMU Waste Analysis Plan
Addendum C	Reserved
Addendum D	Reserved
Addendum E	400 Area WMU Contingency Plan
Addendum F	400 Area WMU Training Plan
Addendum G	400 Area WMU Closure Plan
Addendum H	400 Area Container Storage Units Inspection Plan

**DEFINITIONS**

Reserved

**ACRONYMS**

The following acronyms are specific to Part III Chapter 16 of this permit:

CCPs	Core Component Pots
FFTF	Fast Flux Test Facility
ISA	Interim Storage Area
FSF	Fuel Storage Facility
PPA	Property Protected Area
WMU	Waste Management Unit

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1 **III.16.A COMPLIANCE WITH PERMIT CONDITIONS**

2 The Permittees are authorized to accept and store mixed waste in the 400 Area WMU  
3 container storage units, the FSF and the ISA. These dangerous waste management units  
4 and corresponding waste management activities will be subject to conditions in this  
5 Chapter, its addendums, and the applicable requirements in Parts I and II.

6 **III.16.B GENERAL WASTE MANAGEMENT STANDARDS**

7 **III.16.B.1 General Waste Management**

8 The Permittees may accept for storage in the 400 Area WMU ISA only those mixed  
9 wastes that are identified in Addendum A.

10 **III.16.B.2 Waste Analysis Plan**

11 III.16.B.2.a The Permittees will maintain an accurate and complete knowledge for the waste stream  
12 identified in permit condition III.16.B.1. An electronic or hard copy of this information  
13 must be available to personnel at the 400 Area Waste Management Unit at all times  
14 wastes are being received or managed.

15 III.16.B.2.b The Permittees will maintain appropriate administrative controls and work practices to  
16 ensure that only wastes specified in Permit Condition III.16.B.1 are received by the ISA  
17 for storage, and that no commingling or cross-contamination of the waste stream  
18 specified in Permit Condition III.16.B.1 with any other waste stream may occur.

19 III.16.B.2.c Upon receipt of a waste shipment at the ISA in accordance with Addendum B, the  
20 Permittees will verify that the corresponding wastes match the specification of wastes  
21 acceptable for storage at the ISA in Permit Condition III.16.B.1 through process  
22 knowledge and records review. The Permittee will place documentation of the results of  
23 this verification and the identity of all wastes accepted for management in the 400 Area  
24 WMU portion of the Hanford Facility operating record required by Permit Condition II.I.

25 **III.16.B.3 Recordkeeping and Reporting**

26 III.16.B.3.a The Permittees will comply with the recordkeeping requirements in  
27 [WAC 173-303-380\(1\)\(o\)](#), incorporated by reference.

28 **III.16.B.4 Preparedness and Prevention**

29 III.16.B.4.a The Permittees will post warning signs stating “DANGER—UNAUTHORIZED  
30 PERSONNEL KEEP OUT” or an equivalent legend will be posted at entrances to the  
31 FSF and the ISA. These signs are, or will be, written in English, legible from a distance  
32 of 7.6 meters, and visible from any approach.

33 III.16.B.4.b The Permittees will comply with the requirements of [WAC 173-303-395\(1\), \(2\), and \(6\)](#),  
34 incorporated by reference.

35 **III.16.B.5 Inspections**

36 III.16.B.5.a The Permittees will perform inspections of the 400 Area WMU, FSF and the ISA  
37 according to the inspection plan in Addendum H. The Permittee will remedy any  
38 deterioration or malfunction discovered by an inspection as required by  
39 [WAC 173-202-320\(3\)](#), incorporated by reference.

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- 1 III.16.B.5.b The Permittees will place inspection records in the 400 Area WMU portion of the  
2 Hanford Facility operating record required by Permit Condition II.I. These records will  
3 contain the following information:
- 4 1. Date and time of inspection
  - 5 2. Printed name and the handwritten signature of the inspector
  - 6 3. Notation of the observations made
  - 7 4. Date and nature of any repairs or remedial actions taken, or the scheduled date for  
8 such repairs or remedial actions
- 9 **III.16.B.6 Reserved**
- 10 **III.16.B.7 Contingency Plan**
- 11 The Permittees will comply with the 400 Area WMU Contingency Plan in Addendum E  
12 to this Chapter in addition to the requirements of Permit Condition II.A.
- 13 **III.16.B.8 Training Plan**
- 14 III.16.B.8.a The Permittees will comply with the training requirements in Addendum F to this  
15 Chapter in addition to the requirements of Permit Condition II.C.
- 16 **III.16.B.9 Closure**
- 17 III.16.B.9.a The Permittees will close the 400 Area WMU Container Storage Units in accordance  
18 with the Closure Plan in Addendum G.
- 19 III.16.B.9.b The Permittees will amend the Closure Plan in accordance with Permit Condition II.J.3  
20 and the Closure Plan in Addendum G.
- 21 III.16.B.9.c The Permittees will provide Ecology with a Notice of Closure according to  
22 [WAC 173-303-610\(3\)\(c\)](#).
- 23 **III.16.B.10 Reserved**
- 24 **III.16.B.11 Land Disposal Restriction Requirements**
- 25 The Permittees will ensure a schedule of compliance and any applicable associated work  
26 requirements are included in the land disposal restrictions report required by the  
27 HFFACO Milestone M-26, incorporated by reference by permit condition II.S for  
28 treatment and/or acquisition of treatment capacity for wastes which are or are expected to  
29 be stored in the 400 Area WMU container storage units.
- 30 **III.16.C CONTAINERS**
- 31 **III.16.C.1 Container Dangerous Waste Management Unit Configuration and Waste  
32 Management Capacity**
- 33 III.16.C.1.a The Permittees will maintain the physical configuration of the FSF and the ISA according  
34 to the Unit Description above.
- 35 III.16.C.1.b The Permittees are authorized to store CCPs generated prior to the effective date of this  
36 permit in two large metal boxes in the 400 Area WMU FSF.
- 37 III.16.C.1.c The Permittees are authorized store mixed waste in the ISA up to a maximum capacity of  
38 19,000 gallons.

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- 1 **III.16.C.2 Identification of Containers and Container Management Practice**
- 2 III.16.C.2.a The Permittees will ensure that all containers remain in good condition. If a container  
3 holding mixed waste is not in good condition (e.g., severe rusting or corrosion, or  
4 apparent structural defects), or if it begins to leak, the Permittee must transfer the waste  
5 from the container to a container that is in good condition or place the leaking container  
6 in an appropriate over-pack container. [[WAC 173-303-630\(2\)](#)]
- 7 III.16.C.2.b The Permittees will label containers in accordance with the requirements of  
8 [WAC 173-303-630\(3\)](#), incorporated by reference.
- 9 III.16.C.2.c The Permittees shall ensure that all containers are constructed of carbon steel or stainless  
10 steel, or other materials compatible with metallic sodium and sodium hydroxide.  
11 [[WAC 173-303-630\(4\)](#)]
- 12 III.16.C.2.d The Permittees will manage waste in containers according to the requirements of  
13 [WAC 173-303-630\(5\)](#), incorporated by reference.
- 14 III.16.C.2.e All containers must be stored in accordance with [WAC 173-303-630\(8\)\(b\)](#), incorporated  
15 by reference.
- 16 III.16.C.2.f The Permittees must remove spilled or leaked waste within secondary containment  
17 pursuant to [WAC 173-303-630\(7\)\(a\)\(ii\)](#), incorporated by reference.
- 18 III.16.C.2.g The Permittees will store waste in the 400 Area WMU container storage units according  
19 to the requirements of [WAC 173-303-640\(8\)\(b\)](#), incorporated by reference.  
20 [[WAC 173-303-640\(8\)](#)]
- 21 **III.16.C.3 Requirements for the Fuel Storage Facility**
- 22 III.16.C.3.a The Permittee will maintain an inert gas (argon or nitrogen) cover within each large metal  
23 box to prevent contact of the metallic sodium with the water vapor in the air and the  
24 formation of free liquids.
- 25 III.16.C.3.b The Permittees will place large boxes stored in the FSF in drip pans to ensure a base free  
26 of cracks or gaps, and ensure that the large boxes are elevated or otherwise protected  
27 from contact with accumulated liquids.
- 28 **III.16.C.4 Requirements for the Interim Storage Area**
- 29 III.16.C.4.a The Permittee may store wastes in the ISA in standard metal containers (e.g., 208-liter  
30 drums), large metal boxes fabricated to accommodate the size and shape of a particular  
31 component or debris, or unique components removed from FFTF that when closed in  
32 accordance with [WAC 173-303-630\(5\)\(a\)](#) serve as a primary container.
- 33 III.16.C.4.b Unique containers stored in the ISA must be placed on drip pans; or if containing free  
34 liquids, within secondary containment having sufficient capacity to contain ten percent of  
35 the volume of all containers within the same secondary containment area or the largest  
36 container, whichever is greater. [[WAC 173-303-630\(7\)](#)]
- 37 III.16.C.4.c The Permittees will store standard metal containers in the ISA within container storage  
38 modules specifically configured for storage of reactive, ignitable, and corrosive waste,  
39 and that protect containers from precipitation and run-on. Container storage modules  
40 may be placed on gravel within the ISA, and must be properly anchored to prevent  
41 displacement or overturning.
- 42 III.16.C.4.d The Permittees will manage unique components stored in the ISA on the gravel surface  
43 with sufficient open space between components and between components and the fence  
44 line to accommodate inspections and movement of equipment.

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- 1 III.16.C.4.e The Permittees will not place wastes in the open-sided structure within the ISA identified
- 2 in the Unit Description.

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WA7 89000 8967, Part III Operating Unit 16  
400 Area Waste Management Unit

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 WASHINGTON STATE DEPARTMENT OF <b>ECOLOGY</b>		<b>Dangerous Waste Permit Application          Part A Form</b>																
		Date Received	Reviewed by: <i>J.F.</i>	Date:	05   16   2007													
Month	Day	Year	Approved by: <i>J.P. Davis</i>	Date:	05   16   2007													
<b>I. This form is submitted to: (place an "X" in the appropriate box)</b>																		
<input checked="" type="checkbox"/>	Request modification to a final status permit (commonly called a "Part B" permit)																	
<input type="checkbox"/>	Request a change under interim status																	
<input type="checkbox"/>	Apply for a final status permit. This includes the application for the initial final status permit for a site or for a permit renewal (i.e., a new permit to replace an expiring permit).																	
<input type="checkbox"/>	Establish interim status because of the wastes newly regulated on:				(Date)													
List waste codes:																		
<b>II. EPA/State ID Number</b>																		
W	A	7	8	9	0	0	0	8	9	6	7							
<b>III. Name of Facility</b>																		
US Department of Energy – Hanford Facility																		
<b>IV. Facility Location (Physical address not P.O. Box or Route Number)</b>																		
<b>A. Street</b>																		
825 Jadwin																		
City or Town				State	ZIP Code													
Richland				WA	99352													
County Code (if known)		County Name																
0	0	5	Benton															
<b>B. Land Type</b>		<b>C. Geographic Location</b>			<b>D. Facility Existence Date</b>													
		Latitude (degrees, mins, secs)			Longitude (degrees, mins, secs)													
					Month      Day      Year													
F	S	E	E	T	O	P	O	M	A	P	0	3	2	2	1	9	4	3
<b>V. Facility Mailing Address</b>																		
<b>Street or P.O. Box</b>																		
P.O. Box 550																		
City or Town				State	ZIP Code													
Richland				WA	99352													

<b>VI. Facility contact (Person to be contacted regarding waste activities at facility)</b>													
<b>Name (last)</b>						<b>(first)</b>							
Klein						Keith							
<b>Job Title</b>						<b>Phone Number (area code and number)</b>							
Manager						(509) 376-7395							
<b>Contact Address</b>													
<b>Street or P.O. Box</b>													
P.O. Box 550													
<b>City or Town</b>						<b>State</b>		<b>ZIP Code</b>					
Richland						WA		99352					
<b>VII. Facility Operator Information</b>													
<b>A. Name</b>						<b>Phone Number (area code and number)</b>							
Department of Energy Owner/Operator Fluor Hanford** Co-Operator for 400 Area Waste Management Unit						(509) 376-7395 (509) 375-3576**							
<b>Street or P.O. Box</b>													
P.O. Box 550 P.O. Box 1000 **													
<b>City or Town</b>						<b>State</b>		<b>ZIP Code</b>					
Richland						WA		99352					
<b>B. Operator Type</b>		F											
<b>C. Does the name in VII.A reflect a proposed change in operator?</b>						<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No							
If yes, provide the scheduled date for the change:						<b>Month</b>		<b>Day</b>			<b>Year</b>		
<b>D. Is the name listed in VII.A. also the owner? If yes, skip to Section VIII.C.</b>						<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No							
<b>VIII. Facility Owner Information</b>													
<b>A. Name</b>						<b>Phone Number (area code and number)</b>							
Keith A. Klein, Operator/Facility-Property Owner						(509) 376-7395							
<b>Street or P.O. Box</b>													
P.O. Box 550													
<b>City or Town</b>						<b>State</b>		<b>ZIP Code</b>					
Richland						WA		99352					
<b>B. Operator Type</b>		F											
<b>C. Does the name in VII.A reflect a proposed change in operator?</b>						<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No							
If yes, provide the scheduled date for the change:						<b>Month</b>		<b>Day</b>			<b>Year</b>		
<b>IX. NAICS Codes (5/6 digit codes)</b>													
<b>A. First</b>						<b>B. Second</b>							
5	6	2	2	1		9	2	4	1	1	0	Administration of Air & Water Resource & Solid Waste Management Programs	
<b>C. Third</b>						<b>D. Fourth</b>							
5	4	1	7	1	0	9	9	9	9	9	9	Unclassified Establishments	

<b>X. Other Environmental Permits (see instructions)</b>														
<b>A. Permit Type</b>		<b>B. Permit Number</b>											<b>C. Description</b>	
	E	A	I	R		0	6	-	1	0	0	7		WAC 246-247, Radiation Protection – Air Emissions
	E	A	I	R		0	6	-	1	0	1	1		WAC 246-247, Radiation Protection – Air Emissions
	E	U	S	T		4	5	0	1					WAC 173-216, State Waste Discharge Permit Program 400 Area/FFTF

**XI. Nature of Business (provide a brief description that includes both dangerous waste and non-dangerous waste areas and activities)**

The Fast Flux Test Facility (FFTF) was a 400-megawatt (thermal) liquid-metal cooled (sodium) research and test reactor located in the 400 Area of the Hanford Facility. The FFTF developed and tested advanced fuels and material for the Liquid Metal Fast Breeder Reactor program. The FFTF was constructed in the late 1970's and first went critical on February 9, 1980. FFTF operated successfully from 1982 to 1992. The Department of Energy (DOE) issued a shutdown order in December 1993, and since that time, the DOE has been de-fueling the reactor and deactivating systems, as they were no longer needed. Mixed waste stored in the 400 Area Waste Management unit can include elemental sodium (D001, D003, WSC2) and sodium hydroxide (D002); as well as debris (for example piping, equipment, and components) contaminated with elemental sodium and sodium hydroxide. The mixed waste stored in the 400 Area Waste Management unit is limited to wastes generated from the 400 Area. Mixed waste will be stored in containers (for example drums and boxes) until treatment capabilities are available.

**Greater-than 90-day Storage Areas:**

Fuel Storage Facility (Building 403)

The Fuel Storage Facility (FSF) is a one-level reinforced concrete substructure covered by a steel frame metal-sided high bay building. Building dimensions are 34 x 27 x 12 meters (112 x 90 x 40) high. The principal equipment in the FSF is a belowground cell containing a carbon steel storage vessel approximately 6.4 meters (21 feet) in diameter and 7.3 meters (24 feet) deep for storing up to 466 FFTF spent fuel assemblies in liquid sodium. Adjacent buildings and below-grade cells contain the natural draft heat exchanger used to cool the FSF pool. With the exception of two areas, which are radiation areas (cells 907 and 906); all accessible areas are Radioactive Material Areas. The process design capacity for the FSF is 1,000 gallons.

Interim Storage Area

The 400 Area Interim Storage Area (ISA) consists of 156 x 75 meters (513 x 247 feet) totally fenced area with perimeter lighting that has been designated for above ground dry cask storage of spent fuel. A concrete pad, which measures 27 x 37 meters (90 x 120 Feet), was used for cask storage. The process design capacity for the ISA is 19,000 gallons.

**EXAMPLE FOR COMPLETING ITEMS XII and XIII (shown in lines numbered X-1, X-2, and X-3 below):** A facility has two storage tanks that hold 1200 gallons and 400 gallons respectively. There is also treatment in tanks at 20 gallons/hr. Finally, a one-quarter acre area that is two meters deep will undergo *in situ vitrification*.

Section XII. Process Codes and Design Capacities							Section XIII. Other Process Codes							
Line Number	A. Process Codes (enter code)			B. Process Design Capacity		C. Process Total Number of Units	Line Number	A. Process Codes (enter code)			B. Process Design Capacity		C. Process Total Number of Units	D. Process Description
	1. Amount	2. Unit of Measure (enter code)		1. Amount	2. Unit of Measure (enter code)			1. Amount	2. Unit of Measure (enter code)					
X 1	S	0	2	1,600	G	002	X 1	T	0	4	700	C	001	In situ vitrification
X 2	T	0	3	20	E	001								
X 3	T	0	4	700	C	001								
1	S	0	1	20,000	G	003	1							
2							2							
3							3							
4							4							
5							5							
6							6							
7							7							
8							8							
9							9							
1 0							1 0							
1 1							1 1							
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1 3							1 3							
1 4							1 4							
1 5							1 5							
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1 9							1 9							
2 0							2 0							
2 1							2 1							
2 2							2 2							
2 3							2 3							
2 4							2 4							
2 5							2 5							

**XIV. Description of Dangerous Wastes**

**Example for completing this section:** A facility will receive three non-listed wastes, then store and treat them on-site. Two wastes are corrosive only, with the facility receiving and storing the wastes in containers. There will be about 200 pounds per year of each of these two wastes, which will be neutralized in a tank. The other waste is corrosive and ignitable and will be neutralized then blended into hazardous waste fuel. There will be about 100 pounds per year of that waste, which will be received in bulk and put into tanks.

Line Number	A. Dangerous Waste No. (enter code)			B. Estimated Annual Quantity of Waste	C. Unit of Measure (enter code)	D. Processes															
						(1) Process Codes (enter)						(2) Process Description [If a code is not entered in D (1)]									
X 1	D	0	0	2	400	P	S	0	1	T	0	1									
X 2	D	0	0	1	100	P	S	0	2	T	0	1									
X 3	D	0	0	2																	Included with above
	1	D	0	0	1	30	T	S	0	1											Includes debris
	2	D	0	0	2		T	S	0	1											Includes debris
	3	D	0	0	3		T	S	0	1											Includes debris
	4	W	S	C	2		T	S	0	1											Includes debris
	5																				
	6																				
	7																				
	8																				
	9																				
	1 0																				
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	1 9																				
	2 0																				
	2 1																				
	2 2																				
	2 3																				
	2 4																				
	2 5																				

**XV. Map**  
 Attach to this application a topographic map of the area extending to at least one (1) mile beyond property boundaries. The map must show the outline of the facility; the location of each of its existing and proposed intake and discharge structures; each of its dangerous waste treatment, storage, recycling, or disposal units; and each well where fluids are injected underground. Include all springs, rivers, and other surface water bodies in this map area, plus drinking water wells listed in public records or otherwise known to the applicant within ¼ mile of the facility property boundary. The instructions provide additional information on meeting these requirements.

**XVI. Facility Drawing**  
 All existing facilities must include a scale drawing of the facility (refer to Instructions for more detail).

**XVII. Photographs**  
 All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment, recycling, and disposal areas; and sites of future storage, treatment, recycling, or disposal areas (refer to Instructions for more detail).

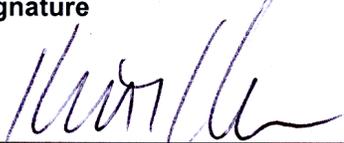
**XVIII. Certifications**

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

<b>Operator</b> Name and Official Title (type or print) Keith A. Klein, Manager U.S. Department of Energy Richland Operations Office	<b>Signature</b> 	<b>Date Signed</b> 5/19/07
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<b>Co-Operator**</b> Name and Official Title (type or print) George W. Jackson Executive Vice-President and Chief Operating Officer Fluor Hanford	<b>Signature</b> 	<b>Date Signed</b> 4/27/07
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**Co-Operator\*\* – Address and Telephone Number**  
 2420 Stevens Center  
 P.O. Box 1000  
 Richland, WA 99352-1000  
 (509) 376-3576

<b>Facility-Property Owner</b> Name and Official Title (type or print) Keith A. Klein, Manager U.S. Department of Energy Richland Operations Office	<b>Signature</b> 	<b>Date Signed</b> 5/19/07
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**Comments**

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## 400 Area Waste Management Unit

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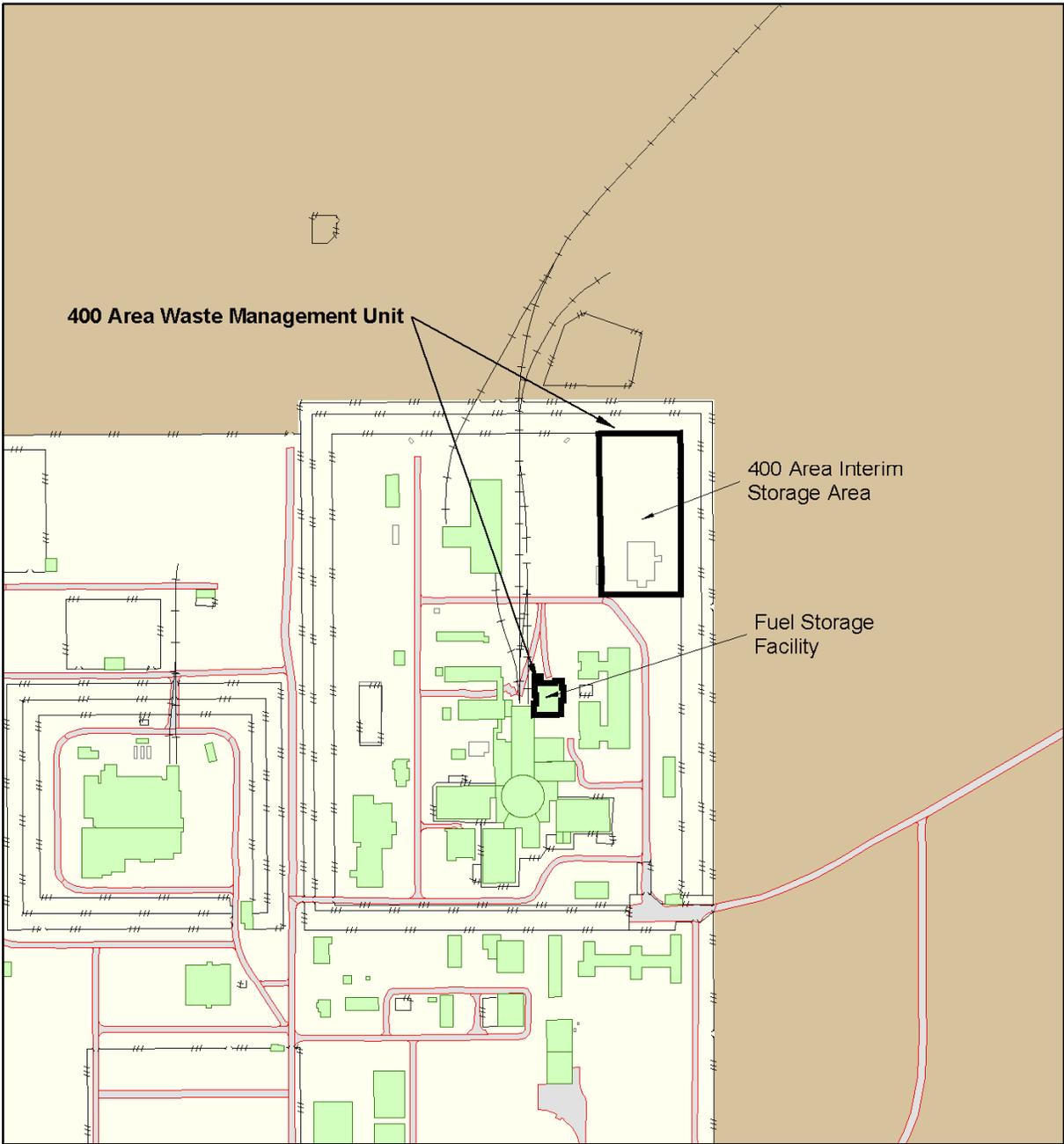
**Fuel Storage Facility (FSF)**  
Building 403

8-2006



**Interim Storage Area (ISA)**  
Building 4718

8-2006



### 400 Area Waste Management Unit

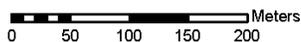
Prepared for:  
 US DEPARTMENT OF ENERGY  
 RICHLAND OPERATIONS OFFICE



Created and Published by: Central Mapping Services  
 Fluor Hanford, Richland, WA (509) 376-8759

INTENDED USE: REFERENCE ONLY

- |                     |                       |
|---------------------|-----------------------|
| TSD Unit Boundary   | Buildings and Mobiles |
| DOE Operating Areas | Structures            |
| Hanford Facility    | Concrete              |
| Major Roads         | Railroads             |
| Service Roads       | Fences                |



O:\Projects\2005\RCRA\_TSD\050614\_2ndPriorityFacilityTopos2005\_Thompson\Maps\060906\_400Area\_LineDwg\_85x11\_Rev2.mxd - 4/3/2007 @ 12:44:06 PM

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1	<b>Addendum B</b>	<b>Waste Analysis Plan</b>
2	B.	WASTE ANALYSIS PLAN [C] .....B.1
3	B.1	UNIT DESCRIPTION ..... B.1
4	B.1.1	Description of Unit Processes and Activities.....B.1
5	B.1.2	Identification and Classification of Waste.....B.1
6	B.2	CONFIRMATION PROCESS..... B.1
7	B.2.1	Pre-Transfer Review .....B.2
8	B.2.2	Verification of Waste.....B.2
9	B.2.3	Waste Acceptance.....B.2
10	B.2.4	Conformance Issue Resolution .....B.2
11	B.3	SELECTING WASTE ANALYSIS PARAMETERS..... B.3
12	B.4	SELECTING SAMPLING PROCESSES ..... B.3
13	B.5	SELECTING A LABORATORY, LABORATORY TESTING, AND
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**B. WASTE ANALYSIS PLAN**

2 The purpose of this Waste Analysis Plan (WAP) is to document waste analysis activities associated with  
3 the 400 Area WMU to comply with [WAC 173-303-300\(1\), \(2\), \(4\), and \(5\)](#). [WAC 173-303-300\(3\)](#) and  
4 (6) are not applicable, as the 400 Area WMU will not receive waste from any offsite facilities. Mixed  
5 waste managed in the 400 Area WMU is limited to waste generated in the 400 Area. Descriptions  
6 required by [WAC 173-303-300\(5\)](#) are contained in the following sections.

7 **B.1 UNIT DESCRIPTION**

8 The 400 Area WMU is a nonland-based unit located in the 400 Area of the Hanford Facility and contains  
9 two container storage dangerous waste management units. The 400 Area WMU is operated in accordance  
10 with the provision of [WAC 173-303-630](#). The mission of the 400 Area WMU is to store mixed waste  
11 until it is treated. Treatment is not currently provided for mixed waste stored at the 400 Area WMU.

12 **B.1.1 Description of Unit Processes and Activities**

13 The 400 Area WMU includes the FSF (Building 403) and the ISA. The unit boundary is represented by  
14 the perimeter of each of these noncontiguous storage locations, as shown on the topographic map related  
15 to the Addendum A, Part A Form on file with Ecology.

16 Addendum A, Part A Form identifies waste quantities and the process design capacity for the 400 Area  
17 WMU. Sodium contamination is associated with the sodium used as coolant in the FFTF reactor. The  
18 400 Area WMU will continue to receive sodium-contaminated waste and debris as it is generated from  
19 FFTF. In addition, sodium-contaminated waste, generated in association with former FFTF operations  
20 and currently in storage at other Hanford Facility locations, could be transferred to the 400 Area WMU  
21 for consolidation with other 400 Area-generated waste. Transfers of mixed waste to the 400 Area WMU  
22 will be conducted under Permit Condition II.P.2.

23 **B.1.2 Identification and Classification of Waste**

24 Waste types not specifically identified in Addendum A, Part A Form are prohibited from storage in the  
25 400 Area WMU. The waste can only exhibit the characteristics of ignitability, reactivity, and/or  
26 corrosivity.

27 Waste is designated using manufacturers' product information, Material Safety Data Sheets (MSDSs),  
28 laboratory analysis provided by the generator, and/or reference material such as Registry of Toxic Effects  
29 of Chemical Substances (published by the National Institutes for Occupational Safety and Health).  
30 Addendum A, Part A Form identifies dangerous waste numbers for waste types stored at the 400 Area  
31 WMU. These dangerous waste numbers and corresponding references are as follows:

<u>Dangerous Waste Number (Characteristic)</u>	<u>Reference</u>
D001 (ignitable)	<a href="#">WAC 173-303-090(5)</a>
D002 (corrosive liquid)	<a href="#">WAC 173-303-090(6)</a>
D003 (reactive)	<a href="#">WAC 173-303-090(7)</a>
WSC2 (corrosive solid)	<a href="#">WAC 173-303-090(6)/104</a>

32 **B.2 CONFIRMATION PROCESS**

33 The confirmation process is the process by which the 400 Area WMU staff will confirm their knowledge  
34 about a waste before it is placed into storage to ensure the waste is managed properly. The confirmation  
35 process includes completing appropriate pre-transfer reviews and verification steps as described in this  
36 section.

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### 1 **B.2.1 Pre-Transfer Review**

2 Pre-transfer review takes place before waste can be placed in the 400 Area WMU. The review focuses on  
3 whether the analysis information (e.g., waste profile documentation) is sufficient to determine that the  
4 waste can be safely stored and that the waste was generated at the 400 Area. The pre-transfer review will  
5 be documented and maintained in the unit-specific operating record. The analysis must include data  
6 obtained by testing the waste and/or 'knowledge' of the waste (i.e., sufficient information about a waste to  
7 substitute reliably for direct testing of the waste). 'Knowledge' consists of existing published or  
8 documented analysis data on the waste or data from waste generated in similar processes, including but  
9 not limited to the following:

- 10 • MSDSs on chemical products
- 11 • Analytical data on the waste or a waste from a similar process
- 12 • Interview information
- 13 • Logbooks
- 14 • Procurement records
- 15 • Qualified analytical data
- 16 • Procedures and/or methods
- 17 • Process flow charts
- 18 • Inventory sheets
- 19 • Vendor information

### 20 **B.2.2 Verification of Waste**

21 Verification is an assessment performed at waste receipt to substantiate that the waste stream received at  
22 the 400 Area WMU is the same as represented by the analysis information and/or supporting  
23 documentation. Verification includes a container receipt inspection. Documentation to be reviewed as  
24 part of verification activities may include the container inventory documentation, a container listing  
25 report, and the waste profile documentation. For all TSD locations within the 400 Area WMU, each  
26 container or group of containers is inspected before acceptance by waste operations personnel for  
27 damage, proper closure, marking, and proper accompanying documentation.

### 28 **B.2.3 Waste Acceptance**

29 Acceptance of waste into the 400 Area WMU occurs only after the confirmation process (pre-transfer  
30 review and verification) is complete. Conformance issues identified during the confirmation process are  
31 documented and managed in accordance with Section H.2.4. Conformance issues that must be corrected  
32 before waste acceptance include:

- 33 • Waste that does not match approved waste profile documentation,
- 34 • Designation discrepancy, and
- 35 • Packaging discrepancy

### 36 **B.2.4 Conformance Issue Resolution**

37 A conformance issue is any discrepancy identified during the confirmation process with waste profile  
38 documentation, a waste package, or a waste shipment. Discrepancies can be identified during pre-transfer  
39 review of a waste stream or during the verification process. If a possible conformance issue is identified,  
40 the following actions are taken by the 400 Area WMU staff to resolve the issue:

- 41 • Compile all information concerning the possible conformance issue(s),
- 42 • Gather additional knowledge that may assist in the resolution of the concern(s), and
- 43 • Determine and implement the appropriate course of action to resolve the issue

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1 **B.3 SELECTING WASTE ANALYSIS PARAMETERS**

2 Sodium is the material of interest to support safe storage of the waste (including contaminated piping,  
3 appurtenances, and debris) at the 400 Area WMU. Sodium is a single element waste (i.e., no other  
4 chemical contamination) as it was contained in closed-loop cooling systems throughout FFTF reactor  
5 operation. In addition, the ignitable and reactive properties of sodium metal are well known and  
6 documented (MSDSs and FFTF operating history), and the sodium waste to be stored in the 400 Area  
7 WMU is consistent with these properties. Analytical data exist for the sodium contained in the FFTF  
8 cooling system, therefore, no further sampling and analyses of the sodium waste are planned.

9 Based on known chemical properties of sodium metal, small amounts of concentrated sodium hydroxide  
10 and trace amounts of hydrogen may be generated if the sodium comes in contact with water vapor in the  
11 air during storage. Due to the potential formation of sodium hydroxide having a pH greater than 12.5, the  
12 sodium metal is designated as a corrosive (WSC2). In the event that liquid is identified in sodium waste  
13 secondary containment, the liquid will be managed under the generator provisions of [WAC 173-303-200](#)  
14 and is beyond the scope of this WAP.

15 **B.4 SELECTING SAMPLING PROCESSES**

16 Additional analytical data are not required to store safely the sodium-contaminated waste at the 400 Area  
17 WMU. Therefore, no additional waste sampling is planned.

18 **B.5 SELECTING A LABORATORY, LABORATORY TESTING, AND ANALYTICAL**  
19 **METHODS**

20 Additional analytical data are not required to store safely the sodium-contaminated waste at the 400 Area  
21 WMU. Therefore, there is no need to select a laboratory, laboratory testing methods, or analytical  
22 methods.

23 **B.6 SELECTING WASTE RE-EVALUATION FREQUENCIES**

24 Additional analytical data are not required to store safely the sodium-contaminated waste at the 400 Area  
25 WMU. Therefore, there is no need to select a waste re-evaluation frequency.

26 **B.7 SPECIAL PROCEDURAL REQUIREMENTS**

27 Provisions of [WAC 173-303-300\(5\)\(f\)](#) are not applicable. Additional analytical data are not required to  
28 store safely the sodium-contaminated waste at the 400 Area WMU. Therefore, no special procedural  
29 requirements for sampling and analysis apply.

30 The 400 Area WMU will not conduct any land disposal restrictions (LDR) treatment of waste in storage.  
31 Therefore, the LDR requirements applicable to the 400 Area WMU are limited to the record keeping  
32 requirements in [WAC 173-303-380\(1\)\(o\)](#) and LDR reporting requirements under the Hanford Federal  
33 Facility Agreement and Consent Order. Mixed waste stored in the 400 Area WMU will be treated in  
34 accordance with Permit Condition II.S.

35 **B.8 RECORDKEEPING**

36 Confirmation process records, described in Section H.2, will be maintained in accordance with Permit  
37 Conditions II.I.1 and II.I.1.b. These records will be maintained in the 400 Area WMU unit-specific  
38 portion of the Facility Operating Record from the time the waste is received until a period of ten years  
39 following certification of closure.

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1 **Addendum E** **Contingency Plan**

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2 E. CONTINGENCY PLAN [G].....E.1

3 E.1 BUILDING EVACUATION ROUTING (BUILDING LAYOUT).....E.3

4 E.2 BUILDING EMERGENCY DIRECTOR .....E.3

5 E.3 IMPLEMENTATION OF THE PLAN.....E.3

6 E.3.1 Protective Action Responses.....E.4

7 E.3.2 Response to Facility Operations Emergencies.....E.5

8 E.3.3 Prevention of Recurrence or Spread of Fires, Explosions, or Releases .....E.7

9 E.3.4 Incident Recovery and Restart of Operations .....E.7

10 E.3.5 Incompatible Waste .....E.8

11 E.3.6 Post Emergency Equipment Maintenance and Decontamination .....E.8

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13 E.4.1 Fixed Emergency Equipment.....E.8

14 E.4.2 Portable Emergency Equipment .....E.9

15 E.4.3 Communications Equipment/Warning Systems .....E.9

16 E.4.4 Personal Protective Equipment .....E.10

17 E.4.5 Spill Control and Containment Supplies.....E.10

18 E.4.6 Incident Command Post.....E.10

19 E.5 REQUIRED REPORTS.....E.10

20 E.6 PLAN LOCATION AND AMENDMENTS.....E.10

21 E.7 BUILDING EMERGENCY ORGANIZATION BUILDING EMERGENCY DIRECTOR.....E.11

22 **Figures**

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23 Figure E.1. FFTF Primary Staging Area.....E.12

24 Figure E.2. FFTF Alternate Staging Area.....E.13

25 **Table**

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26 Table E.1. Hanford Facility Documents Containing Contingency Plan Requirements of

27 WAC 173 303-350(3) .....E.1

28

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**OFFICIAL USE ONLY**

May be exempt from public release under the Freedom of Information Act  
(5 U.S.C. 552) Exemption number(s) and category: Exemption 2

Circumvention of Statute

Department of Energy review required before public release

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**Addendum F**

**400 Area Waste Management Unit Training Matrix**

	<b>Training Category*</b>				
Hanford Facility RCRA Permit, Attachment 33, Chapter 8.0 Training Category	General Hanford Facility training	Contingency Plan training	Emergency Coordinator training	Operations training	
400 Area WMU DWTP implementing plan	Orientation Program	Emergency Response (contingency plan)	Emergency Coordinator Training	General Waste Management	Container Management
<b>Job title/position</b>					
Regulatory Compliance Staff	X	X		X	X
Environmental Compliance Officer	X	X		X	
Building Emergency Director	X		X		
Non-Resident Waste Service Provider	X			X	
Non-Resident Sampler	X			X	

\*Refer to the 400 Area WMU Dangerous Waste Training Plan (DWTP) for a complete description.

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1	<b>Addendum G</b>	<b>Closure &amp; Financial Assurance</b>
2	G.	CLOSURE AND FINANCIAL ASSURANCE..... G.1
3	G.1	CLOSURE PLAN..... G.1
4	G.1.1	Closure Performance Standard..... G.1
5	G.1.2	Closure Activities..... G.1
6	G.1.3	Maximum Extent of Operation and Maximum Waste Inventory ..... G.4
7	G.2	SCHEDULE FOR CLOSURE..... G.4
8	G.3	CERTIFICATION OF CLOSURE ..... G.4
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1 or releases be promptly identified and cleaned up to a performance standard equivalent to the clean  
2 closure performance standard established in this closure plan. Therefore, no decontamination is expected  
3 to be necessary at the time of closure, no sampling is planned in support of clean closure, and no other  
4 closure activities are anticipated.

5 If evaluation of documentation such as spill records, field observations, and personnel interviews indicate  
6 the likelihood of waste contamination that was not previously cleaned up, or that the results of past spill  
7 cleanup cannot be verified, this Closure Plan will be amended with an approved Permit modification and  
8 in accordance with Permit Condition II.J.3. Any unanticipated decontamination activities, sampling and  
9 analysis activities, or other activities required for clean closure will be accomplished in accordance with  
10 the amended Closure Plan. The Closure Plan will contain the necessary provisions at the time of closure.

11 At a minimum closure activities will accomplish the following.

- 12 • Remove stored waste inventory and transfer to a permitted on-site dangerous waste management unit,  
13 or to an off-site facility meeting the definition of a “designated facility” in [WAC 173-303-040](#),  
14 incorporated by reference, as appropriate.
- 15 • Perform document review and interview personnel to determine spill history and ensure spills were  
16 completely cleaned up consistent with closure performance standards for the FSF and ISA
- 17 • Verify that performance standard has been achieved
- 18 • Obtain certification described in Section G.3 upon performance standard verification
- 19 • Prepare a Permit modification in accordance with Permit Condition II.J.3 to amend the Closure Plan  
20 and include the additional work requirements necessary to achieve clean closure upon an initial  
21 finding that the performance standard(s) was not achieved.

22 Detailed information for the closure activities are provided as follows.

### 23 **G.1.2.1 Remove Waste Inventory**

24 All containers of waste will be removed from each container storage dangerous waste management unit.  
25 If the containers are removed from the FSF to the ISA to close the FSF in advance of the ISA, a waste  
26 transfer to consolidate wastes in the ISA will be accomplished without the need for specialized  
27 equipment. Waste transfers will be in compliance with [WAC 173-303-380\(1\)\(b\)](#).

28 If the containers require transportation from the FSF or the ISA to another on-site dangerous waste  
29 management unit or off-site TSD Facility, special transportation containment will be designed and  
30 fabricated for the waste stored in the FSF. For waste stored in the ISA, specialized transportation  
31 containment and/or packaging will be determined on a case-by-case basis. In addition, the receiving on-  
32 site dangerous waste management unit or off-site TSD Facility may require time to modify documents in  
33 order to receive the containers of waste.

34 No waste treatment capacity is currently available for the inventory of wastes expected to be managed at  
35 the FSF or the ISA. No waste is expected to be generated during closure activities following removal of  
36 the waste inventory. This closure plan will be amended in accordance with Permit Condition II.J.3 in the  
37 event that waste will be generated.

38 If the ISA never managed any waste at the time of closure, the inspection/survey below will document  
39 that condition.

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1 **G.1.2.2 Perform Document Review and Interview Personnel to Determine Spill History.**

2 Because the 400 Area WMU is and will continue to be a well operated dangerous waste management unit,  
3 the operating record will contain documentation of how any spills were properly cleaned up. Proper clean  
4 up of spills will be determined by demonstrating any residuals from the spills have been removed. The  
5 operating record will show how the spill was cleaned up. A visual performance standard will allow for  
6 clean closure of structures, equipment, bases, liners, etc. The spill clean up records in the operating  
7 record will become a basis to support clean closure of the ISA gravel areas without the need for sampling.  
8 If review of the operating record reveals a problem, the Closure Plan will be amended to include the  
9 necessary steps to satisfy the closure performance standard.

10 **G.1.2.3 Verify Performance Standard Achievement**

11 After all waste has been removed from a container storage dangerous waste management unit(s) and the  
12 document review has been completed, a visual inspection/survey will be performed on any structures,  
13 equipment, bases, liners, etc, to verify that the surface meets the clean debris surface in 40 CFR 268.45  
14 Table 1 footnote 3, incorporated by reference. The inspection/survey will evaluate all surfaces, with  
15 special emphasis on information derived from evaluation of the operation records, logbooks, and  
16 personnel interviews.

17 If no spills occurred in the gravel area of the ISA, the visual inspection/survey will document that “no  
18 spills occurred.” If there were spills in the gravel area and the document review shows that the spills were  
19 completely and properly cleaned up, the visual inspection/survey will document the review finding(s). If  
20 information indicates from evaluation of the operation records, logbooks, and personnel interviews that  
21 contamination is possible from TSD unit activities, this Closure Plan will be amended with an approved  
22 Permit modification in accordance with Permit Condition II.J.3 to incorporate the steps and requirements  
23 to achieve clean closure.

24 Once the inspection/survey is complete and results verify clean closure achievement, the certification  
25 described in Section G.3 will be obtained.

26 **G.1.2.4 Decontaminate and/or Remove Equipment**

27 No decontamination or equipment removal is expected to be required to achieve clean closure. In the  
28 event a problem occurs where decontamination or equipment removal is necessary, a Permit modification  
29 will be prepared to amend the closure plan in accordance with Permit Condition II.J.3.

30 **G.1.2.5 Decontaminate Structures**

31 No structures will require decontamination to achieve clean closure. In the event a problem occurs where  
32 structures will require decontamination, a Permit modification will be prepared to amend the closure plan  
33 in accordance with Permit Condition II.J.3.

34 **G.1.2.6 Remediate Soils**

35 Soil remediation activities are not expected to be necessary as the FSF and ISA are anticipated to be well  
36 maintained. Any spills occurring during the operating life of the FSF and ISA are expected to have been  
37 properly and completely cleaned up to standards consistent with the closure performance standards. In  
38 the event that sampling is necessary for the surrounding gravel areas of the ISA, the Closure Plan will be  
39 amended through a Permit modification in accordance with Permit Condition II.J.3.

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1 **G.1.3 Maximum Extent of Operation and Maximum Waste Inventory**

2 As authorized by Permit Condition III.16.B.1, the FSF and ISA provide storage capacity for waste  
3 generated from decommissioning of the Fast Flux Test Facility (FFTF) before final treatment and/or  
4 disposal. The estimated maximum waste inventory is consistent with the combined storage capacity of  
5 the FSF and the ISA, or 20,000 gallons.

6 **G.2 SCHEDULE FOR CLOSURE**

7 In accordance with [WAC 173-303-610\(3\)\(c\)](#), notification to Ecology is required at least 45 days prior to  
8 the start of closure of the FSF or the ISA.

9 The closure schedule is based on the time required to perform applicable closure activities described in  
10 Section G.1.2. Closure of the FSF and the ISA will be completed 180 days after the start of closure  
11 activities at each unit, respectively. When a closure date is established for a container storage dangerous  
12 waste management unit(s), the schedule will be evaluated, including any additional closure activities  
13 required for clean closure. If Closure Plan modifications are necessary to achieve clean closure, a revised  
14 schedule will be proposed as part of the Permit modification package prepared in accordance with Permit  
15 Condition II.J.3.

16 **G.3 CERTIFICATION OF CLOSURE**

17 Within 60 days of completion of closure activities required by this closure plan, the Permittees will  
18 submit to the Department by registered mail, a certification that the dangerous waste management unit(s)  
19 has been closed in accordance with the specifications in this Plan that are in effect at the time of  
20 completion of closure activities. This certification of closure will address only requirements of this  
21 closure plan covered by the completed closure activities (i.e., either the FSF or the ISA, or both). This  
22 certification will be signed by the Permittees and an independent registered professional engineer. The  
23 independent registered professional engineer certification is to confirm that the activities took place and  
24 that the unit was closed in accordance with the approved Closure Plan. Documentation supporting the  
25 independent registered professional engineer's certification must be furnished to Ecology upon request.

1	<b>Addendum H</b>	<b>Inspection Plan</b>
2	H. INSPECTION PLAN.....	H.1
3	H.1 GENERAL INSPECTION REQUIREMENTS.....	H.1
4	H.1.1 Types of Inspections .....	H.1
5	H.1.2 Frequency of Inspections .....	H.1
6	H.2 SCHEDULE FOR REMEDIAL ACTION FOR PROBLEMS REVEALED [F-2C].....	H.2
7	<b>Tables</b>	
8	Table H.1. Inspection Schedule .....	H.2
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## H. INSPECTION PLAN

This section describes the method and schedule for inspection of the 400 Area WMU. The purpose of the inspections are to prevent malfunctions and deterioration, operating errors, discharges, identify leaking containers, improperly stored containers, and degradation of containment and safety equipment and/or systems (e.g., inert gas pressure in feed line). These inspections help to ensure that situations do not exist that might cause or lead to the release of waste to the environment or that might pose a threat to human health. Abnormal conditions identified by inspections are corrected in accordance with [WAC 173-303-320\(3\)](#).

### H.1 GENERAL INSPECTION REQUIREMENTS

The content and frequency of inspections are described in this section. Inspections, implemented through operating requirements, are documented on inspection checklists and log sheets. Inspection records are maintained in accordance with Permit Condition II.I.1, and contain the following information:

- Date and time of inspection,
- Printed name and the handwritten signature of the inspector,
- Notation of the observations made, and
- Date and nature of any repairs or remedial actions taken

The inspection checklists consist of a listing of items that are to be assessed during each inspection. A yes/no response is made for each listed item. A 'yes' response means that the item is in compliance with the conditions stated on the checklist. Any problems identified during the inspection, as indicated by a 'no' response on the checklist, are reported to the Operations Manager.

#### H.1.1 Types of Inspections

Each week a qualified person performs an inspection of the active 400 Area WMU storage areas and containers for any signs of malfunctions, deterioration, discharges, and other anomalies. Specific items and/or problems to be noted during weekly inspections include the following:

- Condition of concrete floor, curbing, and walls (FSF)
- Appropriate safety and packaging equipment
- Container structural integrity
- Containers closed
- Inert gas pressure in feed line to CCP boxes in the FSF
- Significant corrosion of containers
- Evidence of spills or leaks
- Container labels and markings in place, legible, and unobscured
- Moisture in modules including condensation (ISA storage modules)

Quarterly, the 400 Area WMU personnel conduct inspections and tests of safety equipment. These inspections and tests include portable fire extinguishers, first aid equipment, and spill kits. For addition information, refer to Table H.1, Inspection Schedule.

#### H.1.2 Frequency of Inspections

The 400 Area WMU inspections are performed by qualified personnel. The following inspection frequencies exist (refer to Table H.1):

- Weekly container inspections
- Quarterly inspections
- Daily inspections of those portions of the 400 Area WMU that are in the process of receiving waste or transferring waste out to document any deficiencies noted and to immediately bring deficiencies to the attention of the Operations Manager.
- Annual ignitable/reactive waste storage area inspections

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1 **H.2 SCHEDULE FOR REMEDIAL ACTION FOR PROBLEMS REVEALED [F-2C]**

2 Consistent with [WAC 173-303-320\(3\)](#), if inspections identify leaks, spills, and/or precipitation in the  
3 secondary containment, the resultant material will be removed on a schedule that prevents hazards to  
4 human health and the environment. If corrosion or other obvious structural deficiency is observed on  
5 containers, corrective actions shall be pursued in a timeframe established by the Operations Manager.

6 On receipt and before containers are accepted for storage in the 400 Area WMU, personnel inspect each  
7 container to confirm appropriate documentation, labeling, and soundness of containers. Depending on the  
8 severity of any container anomalies, corrective actions could range from continued monitoring to  
9 correcting on discovery or longer if procurement of needed materials and personnel are required. Other  
10 conditions that are not a threat to human health and the environment will be dispositioned in a timeframe  
11 established by the Operations Manager.

12 **Table H.1. Inspection Schedule**

Requirement Description	Inspection Frequency	Types of Problems
Inspections of those portions of the 400 Area WMU that are in process of receiving or transferring waste out	Daily	Document any deficiencies noted and immediately bring the deficiencies to the attention of the Operations Manager
Container storage areas (FSF)	Weekly	Condition of concrete floor, container structural integrity, containers closed, inert gas pressure in feed line to large boxes, significant corrosion of containers, evidence of leaks, spills, accumulated liquids, and open and improperly sealed containers, container labels and markings in place, legible, and unobstructed
Container storage, large boxes, and unique components (ISA)	Weekly	Condition of containers/large boxes/unique components structural integrity, containers closed, significant corrosion of containers, evidence of leaks, spills, accumulated liquids, and open and improperly sealed containers, container labels and markings in place, legible, and unobstructed, and moisture and condensate in the storage modules
Portable fire extinguishers, first aid kits, spill response kits	Quarterly	Check for equipment not present and test, as appropriate
Ignitable or reactive waste	Annual	Storage in compliance with <a href="#">WAC 173-303-395(l)(d)</a>

13