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CHAPTER 6.0
PROCEDURES TO PREVENT HAZARDS

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CHAPTER 6.0
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1 **6.0 PROCEDURES TO PREVENT HAZARDS**

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

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

16 **6.1 Security**

17 The following sections describe the security measures, equipment, and warning signs to be used to control
18 entry to the IDF. A discussion of Hanford Facility security is provided in Attachment 33, Section 6.1.

19 **6.1.1 Security Procedures and Equipment**

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

22 **6.1.1.1 24-Hour Surveillance System**

23 The Hanford Facility is a controlled-access area [refer to Attachment 33, Section 6.1].

24 **6.1.1.2 Barrier and Means to Control Entry**

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

27 **6.1.1.3 Warning Signs**

28 Signs will be visible from all angles of approach, and legible from a distance of at least 7.6 meters. Each
29 active area used for disposal will be posted with a sign, in English, reading, *DANGER-UNAUTHORIZED*
30 *PERSONNEL KEEP OUT* or an equivalent legend.

31 **6.1.2 Waiver**

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

34 **6.2 Inspection Plan**

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

39 **6.2.1 General Inspection Requirements**

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

- 1 • Date and time of inspection
- 2 • Printed name and the hand written signature of the inspector
- 3 • Notation of the observations made
- 4 • An account of spills or discharges in accordance with [WAC 173-303-145](#)
- 5 • Date and nature of any repairs or remedial actions taken.

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

10 **6.2.1.1 Types of Problems**

11 Types of problems looked for during an inspection in Pre-Active Life are in Table 6.2. Types of
12 problems looked for during an inspection in Active Life are in Table 6.3. Once the IDF begins to receive
13 dangerous waste, the requirements in Table 6.2 are no longer applicable. Each day mixed waste
14 containers and/or bulk waste are handled within the IDF; an operator will perform a daily inspection of
15 areas subject to spills (e.g., loading and unloading areas and waste handling areas).

16 **6.2.1.2 Frequency of Inspections**

17 Table 6.2 provides inspection frequencies during the Pre-Active Life. Tables 6.1, 6.2, and 6.3 provide
18 inspection frequencies during the Active Life. For clarification, areas with operations that may result in
19 spills are described below

20 Each step in the waste placement operation occurs in the landfill over the double HDPE liner system that
21 provides containment of any spill from the waste handling operation.

22 Waste Handling Operations involve the following:

- 23 • Unloading of the waste shipment in the landfill Placement of the cover soil over the waste
24 container

25 During Active Life leachate,¹ movement occurs within the double-contained leachate handling
26 system. There is a potential for a leachate spill on the concrete containment slab of the Crest Pad
27 Building, Leachate Transfer Building, and/or the Leachate Loading Truck Pad.

28 Leachate Handling Operations involve the following:

- 29 • Pumping leachate from the collection sumps to the Crest Pad Building
- 30 • Activities within the Crest Pad Building
- 31 • Transfer of leachate to and from the double-lined Leachate Tanks
- 32 • All activities that occur in the Leachate Transfer Building
- 33 • Pumping of leachate to a tanker truck on the Truck Loading Pad

34 Liquid handling operations involve the following:

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

¹ [WAC 173-303-040](#) defines "Leachate" as any liquid, including any components suspended in the liquid that has percolated through or drained from dangerous waste.

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

6.2.2 Schedule for Remedial Action for Problems Revealed

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

6.2.3 Specific Process or Waste Type Inspection Requirements

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

6.2.3.1 Container Inspection

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

If present, off-specification waste and vitrified waste requiring cooling in storage will be subject to the specific items and/or problems noted during weekly container inspection (Table 6.1) include the following:

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

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

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

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

3 **6.2.3.2 Landfill Inspection**

4 The IDF will be inspected according to the frequencies in Table 6.2 during Pre-Active Life and in
5 accordance with Table 6.3 during Active Life.

6 **6.2.3.2.1 Run-on and Runoff Control System**

7 A run-on control system is installed around the perimeter of each lined trench (Chapter 4.0). The system
8 consists of a berm along the outer margin of each trench that prevents run-on from entering the trench.
9 All run-on control system berms are inspected quarterly (Table 6.2) and after storms for signs of
10 deterioration, malfunction, or improper operation. During Active Life, any precipitation that falls
11 between the run-on control berm and the edge of the trench excavation eventually might flow into the
12 primary leachate control and removal system sump and will be treated as leachate.

13 **6.2.3.2.2 Leak Detection System**

14 During pre-active life, the leak detection system will be monitored quarterly and after storms (Table 6.2)
15 for the amount of liquid removed. To calculate the action leakage rate, measurements are needed to be
16 collected over five consecutive days each quarter. The action leakage rate will be determined for the
17 quarter using these measurements collected during one five day work week each quarter.

18 During Active life (Table 6.3), leak detection for lined trench at the IDF is accomplished by the
19 following:

- 20 • Monitoring liquid level above the secondary liner
- 21 • Monitoring liquid levels above primary liner
- 22 • Inspecting for the presence of liquids after significant precipitation events
- 23 • Verifying certain gauges and instruments are in current calibration; calibration is performed
24 annually or more frequently at intervals suggested by the manufacturer (Chapter 4.0,
25 Section 4.3.7.4)
- 26 • Recording secondary sump levels on a daily action leakage rate calculation sheet (Figure 6.1).

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

29 **6.2.3.2.3 Wind Dispersal Control System**

30 During pre-active life, berms will be inspected quarterly and after storms to ensure the berms are
31 functioning properly (Table 6.2).

32 During active life (Table 6.3), waste is inspected on receipt for evidence of damage, corrosion, or
33 deterioration that might lead to dispersal of the contents.

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

36 In addition, unpackaged or bulk waste handling operations are suspended in winds exceeding
37 24 kilometers per hour unless specifically approved by operations supervisors. The supervisor only
38 would grant approval to operate in winds over 24 kilometers per hour after determining that the risk to
39 human health or the environment would be diminished by completing the work activity, or that the nature
40 and form of the waste handling activity was such that the wind speed would have no significant impact.

41 **6.2.3.2.4 Leachate Collection and Removal System**

42 During pre-active life, the Leachate Collection and Removal System is inspected quarterly and after
43 storms (Table 6.2) for the presence of liquids, and that the system is functioning properly.

1 During active-life (Table 6.3), Liquids in the Leachate Collection and Removal System and Leak
2 Detection System are monitored daily to ensure the action leakage rate (Chapter 4.0, Appendix 4A) is not
3 exceeded and will be inspected per Table 6.2. In addition, a flow meter is used to check if the amount of
4 actual leachate pumped corresponds to the amount accumulated in the leachate collection tank. This
5 check will verify the proper function of the leachate collection and removal sump pumps with each use.

6 **6.3 Preparedness and Prevention Requirements**

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

10 **6.3.1 Pre-Active Life Preparedness and Prevention**

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

15 **6.3.2 Equipment Requirements**

16 The following sections describe the internal and external communications systems and the emergency
17 equipment required.

18 **6.3.3 Internal Communication**

19 There is one building, MO-518, equipped to support communications. Immediate emergency instruction
20 to personnel working at the IDF will be provided by cellular telephones.

21 **6.3.4 External Communications**

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

26 **6.3.5 Emergency Equipment**

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

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

33 **6.3.6 Water for Fire Control**

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

37 **6.3.7 Aisle Spacing Requirements for Off-Specification Waste**

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

1 **6.4 Preventive Procedures, Structures, and Equipment**

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

4 **6.4.1 Unloading Operations**

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

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

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

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

19 **6.4.2 Runoff**

20 The waste in the IDF will be placed below the land surface; thus, the IDF is designed to prevent run-off of
21 precipitation that might have come in contact with the waste. The land surface is relatively level, so
22 trenches have only internal drainage. The minimal amounts of precipitation that accumulate are
23 contained within the trench.

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

27 **6.4.3 Water Supplies**

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

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

- 33 • Placement of waste in lined trenches
 - 34 – Run-on and run-off will be controlled
 - 35 – Leak detection systems will be used
 - 36 – Leachate will be collected and managed as waste
 - 37 – Inspections will be performed
- 38 • Placement of backfill will occur after a layer of waste has been placed in the trench.

39 **6.4.4 Equipment and Power Failure**

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

1 **6.4.5 Personal Protection Equipment**

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

4 **6.5 Prevention of Reaction of Ignitable, Reactive, and Incompatible Waste**

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

8 Waste stream compatibility (i.e., compatibility between individual waste streams and compatibility
9 between waste streams and landfill design and construction parameters) will be assessed on a case-by-
10 case basis. Criteria for assessing and determining compatibility will be identified in either the facility
11 Waste Acceptance Criteria, Waste Analysis Plan, or other protocol or procedure as appropriate
12 (Chapter 3.0) for further discussion of waste stream compatibility.

13

AVERAGE DAILY ACTION LEAKAGE RATE CALCULATION

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

Secondary Sump Total Volume **TOTAL** _____ Gallons

(DIVIDE TOTAL VOLUME BY 7)

AVERAGE DAILY ACTION LEAKAGE RATE: _____ Gallons

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

Repairs or remedial action taken:

Operator's Printed Name: _____ Date _____

Operator's Signature: _____ Time _____ hrs

Operations Supervisor Printed Name: _____ Date _____

Operations Supervisor Signature: _____ Time _____ hrs

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Figure 6.1. Typical Average Daily Action Leakage Rate Calculation

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Table 6.1. Container Storage Inspections

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

2

Table 6.2. Landfill Inspections during Pre-Active Life***

Requirement Description	Inspection Frequency	Types Of Problems
-665(4)(b)(i) Run-on and run-off control	Quarterly and after storms*	Deterioration, malfunction, or improper operation
-665(4)(b)(ii) Wind dispersal control systems	Quarterly and after storms*	Proper functioning
-665(4)(b)(iii) Leachate collection and removal systems	Quarterly and after storms*	Presence of liquids; proper functioning
-665(4)(c)(i) Leak detection system sump	Quarterly and after storms*	Amount of liquids removed
Secondary leak detection system sump**	Quarterly **	Presence of unexpected liquid volume**
Security “Danger unauthorized personnel keep out” signs	Quarterly	Signs are posted and legible
Areas subject to spills	Daily when any activities may take place that have a potential for a spill or release to occur	Evidence of spills

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

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

15
16 *** Once the IDF begins to receive dangerous waste, the requirements in Table 6.2 are no longer applicable, and inspection
17 requirements will be as provided in Table 6.3

18

Table 6.3. Landfill Inspections during Active Life

Requirement Description	Inspection Frequency	Types Of Problems
-665(4)(b)(i) Run-on and run-off control	Weekly and after storms*	Deterioration, malfunction, or improper operation
-665(4)(b)(ii) Wind dispersal control systems	Weekly and after storms*	Proper functioning
-665(4)(b)(iii) Leachate collection and removal systems	Weekly and after storms*	Presence of leachate; proper functioning
-665(4)(c)(i) Leak detection system sump	Weekly and after storms*	Amount of liquids removed
Secondary leak detection system sump**	Monthly**	Presence of unexpected liquid volume**
Security devices: "Danger unauthorized personnel keep out" signs	Weekly	Signs are posted and legible
Areas subject to spills	Daily when waste management activities having a potential for a spill to occur	Evidence of spills

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

3 **Note: Secondary leak detection system is not a design requirement of [WAC 173-303-665](#), however DOE is
4 adding the design feature pursuant to its authority under the Atomic Energy Act of 1954 (AEA) and not for
5 the purposes of compliance with the dangerous waste regulations. Therefore, formation regarding the
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8 nuclear and by-product material component of radioactive mixed waste at DOE-owned nuclear facilities.
9 Source, special nuclear and by-product materials, as defined by AEA, are not subject to regulation under
10 RCRA or the Hazardous Waste Management Act, by the State of Washington and are not be subject to State
11 dangerous waste permit, orders, or any other enforceable instrument issued there under. DOE recognizes
12 that radionuclide data may be useful in the development and confirmation of geohydrologic conceptual
13 models. Radionuclide data contained herein is therefore provided as a matter of comity so the information
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