

Introduction:

The following document is a living document intended to be updated regularly to include new information and track issues related to the Draft Hanford Dangerous Waste Permit, also referred to as the RCRA Permit.

Advice Process:

1. Assemble Issue Manager Team: Liz Mattson, Pam Larsen, Gerry Pollet, Jean Vanni, Steve Hudson
2. Prepare for years for the release of the Permit, work with Ecology to get ready for comment period.
3. Attend public workshop on the Permit and give presentations on issues of concern on May 3, 2012
4. Decide on topics to focus on in the Permit and corresponding units
5. Recruit Volunteers for those topics
6. Volunteers take note of issues that come up – flag potential advice points, questions, etc.
7. Issue Manager team meet regularly by phone or in person to coordinate
8. Decide on Format for advice
9. Compile issues into advice format
10. Review, review again.
11. Get consensus during August Committee Week
12. Bring advice to September HAB meeting.

Areas of Interest and Volunteers:

Permit Section: [Parts I and II Conditions](#)

HAB member/s: Jean Vanni (all), Laura Hanses (as relate to worker safety and training), Tom Carpenter (regulating chemical vapors)

Issue:

- These are the parts of the permit that apply to all units on the site, no matter what. Need to know what is in here.
- May need to ask for more specific conditions in individual units (examples: worker health and safety is addressed in x condition, the Board advises that Ecy include _____ to ensure protection of worker health and safety, regulating chemical vapors)

Notes:

Permit Section: [PART V-Closing Units](#) – (Green Islands in SW burial ground and IDF - All Burial Grounds)

HAB member/s: Jean Vanni, Vince Panesko (on TRU issue)

Issues: All burial grounds including green islands in SW burial grounds and IDF. Characterization of burial grounds, uncertainty.

NOTES:

- Jean requests help with Low Level Burial Grounds and TRU waste. Why not call it mixed waste?
- Where do the alpha caissons and PFP fit?

Permit Section: Part IV-Corrective Action Units, [CA-2 Groundwater Operable Units](#)

HAB member/s: Dale Engstrom

Issues: Groundwater, use of CERCLA, [IY Condition](#)

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Last updated 5/8/12

Notes:

- Action item: Dale will be collecting data on Groundwater investigation and look at that part of the permit.

Permit Section: [Part V-Closure Units, Single Shell Tank Unit](#) (will be available for review July 1, 2012)

HAB Member/s: John Howieson, Becky Holland

Issues:

Notes:

Permit Section: [Part III - Operating Units, Waste Treatment and Immobilization Plant Unit](#)

HAB Member/s: Dirk Dunning, Becky Holland (stack emissions)

Issues:

Notes:

- Dirk will be trying to get a copy of WTP unit documents that are not available on the web version.
- Becky will be looking at stack emissions.

Permit Section: [Part IV-Corrective Action, Waste Management Units](#)

HAB Member/s: Vince Panesko

Issues:

Notes:

Permit Section: Appendix C of TPA?

HAB Member/s: Vince Panesko

Issues:

Notes:

Permit Section: [Part III-Operating Units, Double Shell Tank System and 204-AR](#)

HAB Member/s: Vince Panesko

Issues:

Notes:

- Recruit other TWC members to help with this (Al Boldt, Dick Smith?)

Permit Section: [Part III-Operating Units, Liquid Effluent Retention Facility & 200 Area Effluent Treatment Facility](#)

HAB Member/s: Vince Panesko

Issues:

Notes:

Permit Section: [Part III-Operating Units, Central Waste Complex](#)

HAB Member/s: Gerry Pollet

Issues: Is it a compliant facility?

NOTES:

PERMIT SECTION: [Various Sections of Permit, Offsite Waste](#)

HAB MEMBER/S: Gerry Pollet

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ISSUES:

- Concern that waste may come to Hanford in general and Permit could ban importation of mixed waste.
- Concern that Permit over-relies on Final TC&WM EIS to impose a moratorium on the importation of offsite waste until 2022 when the WTP is operational according to the TPA, and that this moratorium may change, and we won't be able to see the EIS until the end of the Permit comment period if it comes out in "late summer" 2012.

NOTES:

Permit Section:

HAB Member/s:

Issues:

Notes:

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HAB Member/s:

Issues:

Notes:

Permit Section:

HAB Member/s:

Issues:

Notes:

This list is a draft from the May 3, 2012 workshop for Liz to integrate into above topics as "issues" or "notes."

Advice Topics So Far:

Offsite Waste

Risk Budget Tool

SEPA

Groundwater

Leaving Waste in Place

Non-Compliant Permitting

Tank Waste Retrievals and Closure Schedule

CERCLA 5-Year Review

Vadose Zone

Characterization

WTP concerns

Air Permitting – separate for Hanford Site with DOH and Benton Clean Air Authority. It is listed as another permit that they have to have. Part A form. Need some look at this. When WTP operates, will have big air release concerns, issues. If those concerns exist, look at those concerns to make sure that the conditions are adequate.

Worker Safety Concerns – Emergency Management Plan, Look at permit conditions

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ALSO: Very thorough understanding of the permit matters because as modifications come down the road, it really makes a difference in those future decisions.

Could send HAB advice links that are relevant, could also send links to parts of the permit that we want people to read.

Need to schedule a call the week of May 14th

Plan for May RAP meeting:

RCRA Workshop debrief

Advice Development Process

Dieter and Madeleine Public Meeting Process