

Major Concerns (in no particular order):

1. **Interim Status Standards & the RCRA Permit:** All modification documents support DOE's continued RCRA operations under Interim Status Standards despite violations of WAC 173-303-400 and -805 requirements.
Possible advice points: The Board advises DOE and Ecology that TSD operations under interim status standards should cease; all RCRA TSD units should be subject to RCRA final status operating standards and the piecemeal approach to permitting on the Hanford site should not continue. Furthermore the Board advises Ecology that the piecemeal permit modification process needs to end, and that Ecology should require submittal of a complete Part B Application for CWC/WRAP, T-Plant, and the LLBGs that are currently operating without a permit along with Waste Analysis Plans, Process Information and/ or Ground Water Monitoring Plans (for the land disposal units).
2. **References to Offsite waste acceptance:** References (in documents) to acceptance or potential acceptance of Off-site Waste at LLBG Trenches 31 & 34.
Possible advice points: The Board advises DOE and Ecology that off-site wastes should not be permitted to be buried on the Hanford site until a cumulative Risk Assessment indicates there will be no exceedances of groundwater cleanup standards. Furthermore the Board advises EPA to also bar any offsite waste shipments to the Hanford site CWC and LLBG facilities under the CERCLA offsite waste rules [40 CFR 300.440(a)] due to these substantial violations.
3. **SEPA:** SEPA checklist missing. The SEPA regulations state that SEPA evaluations are to occur in conjunction with licensing/permitting activities [197-11-030(2)(e)]. The SEPA checklist evaluates the impacts of the proposal as presented/documented in the dangerous waste permit application/permit modification request.
Possible advice point: The Board advises that DOE's SEPA checklist submitted to Ecology should be included in this modification request for public review.
4. **Part A forms:** The Part A Form seem to be considered as establishing permit conditions.
Possible advice points: The Board advises DOE and Ecology that sections in the Part A must not be taken to provide any changes in authorization for any DWMU that may be operating under Permit Condition I.A.1. The Board further advises DOE and Ecology to not integrate the CWC & WRAP facilities under one Part A or one RCRA permit.
5. **Inspection Plans:**
Possible advice points: The Board advises DOE and Ecology that the inspections and inspection schedule should meet all the requirements of WAC 173-303-320 and applicable items and frequencies required for the specific waste management method describe in WAC 173-303-630 thru WAC 173-303-680, and 40 CFR 264.1033, 264.1052, 264.1053, 264.1058, and 264.1083 through 264.1089 for final status facilities and the requirements in the approved Closure Plan. Furthermore the Board advises that units should not be designated as "in safe configuration", and facility inspections per WAC 173-303 should continue until the unit is closed (e.g.s. daily inspections of spill areas; tanks require daily visual inspections).
6. **Personnel Training Plans:**
Possible advice point: The Board advises DOE and Ecology that the training plan and training matrix should meet all the requirements of WAC 173-303-330 and reflect training for both closing units and operational units.
7. **Closure Plans:**
Possible advice points: The Board advises DOE and Ecology that the closure plan should fully comply with WAC 173-303-610 requirements to have a detailed, complete closure plan to include a specific detailed closure activity schedule with complete removal of wastes in 180 days; closing units which are easily and safely accessible should not delay or defer required closure actions subject to TPA Milestones. The Board advises DOE and Ecology that the Sampling and Analysis Plans (and Waste Analysis Plans) and criteria for waste acceptance at

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the LLBG should be informed by the results of the Risk Budget Tool. Additionally, the Board advises DOE and Ecology that any extension of the closure period must be done per the WAC 173-303-830/840 requirements.

8. **Factsheet: Major concerns:** Failure to disclose in the notice to the public for this comment period that the proposal is a requirement of an EPA Order issued due to existing violations; failure to provide links to referenced documents.

Possible advice points: The Board advises when Ecology issues any further proposals for modifying the permit for these units and facilities, and the results of its review of the USDOE's proposal, that the notice for comment and hearings should specifically include: a summary of the EPA Findings of illegal storage; a link to the EPA Findings and Order; links to a compliance history website page for each unit at Hanford to provide the public with easy access to the compliance history of the unit, including releases and inspection reports; access to the current Rev 8C and the 2004 Permit Applications. The Board further advises that public hearing be held across the region.

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