

1 endangered and threatened species, and 2) consult with appropriate Federal agencies to ensure that any
 2 action carried out by DOE is not likely to jeopardize the continued existence of any endangered or
 3 threatened species or result in the destruction or adverse modification of critical habitat for such species.
 4 Additional information is provided in Sections 4.6.4 and 5.5.12 of this HSW EIS and in Section 2.2.12 of
 5 the *Hanford Site Environmental Report 2001* (Poston et al. 2002).
 6

7 **6.19 Permit Requirements**

8
 9 The CEQ regulations implementing NEPA (40 CFR 1502.25[b]) require that a draft EIS list all
 10 federal permits, licenses, and other entitlements that must be obtained to implement the alternatives.
 11

12 The principal existing Hanford facilities that would be involved in implementing the alternatives in
 13 the HSW EIS are the Central Waste Complex, 200 Area Effluent Treatment Facility (ETF), Liquid
 14 Effluent Retention Facility, LLW Trenches, MLLW Trenches, T Plant Complex, and the Waste
 15 Receiving and Processing Facility. Table 6.1 indicates whether operation of each of these facilities is
 16 covered in the existing Dangerous Waste portion of the Hanford RCRA permit (Ecology 2001a), the
 17 Hanford Air Operating Permit (Ecology 2001b), or the Hanford Waste Discharge Permit (DOE 2002a).
 18 In all cases where units are covered in the Dangerous Waste portion of the Hanford RCRA permit, the
 19 coverage is in Part III of the permit that contains unit-specific conditions for final status operations. The
 20 MLLW trenches and T Plant Complex are being incorporated into the Dangerous Waste portion of the
 21 Hanford RCRA permit (DOE 2002a).
 22

23 **Table 6.1.** Coverage of Hanford Solid Waste Management Units in Existing Permits
 24

Unit	Dangerous Waste Portion of Hanford RCRA Permit	Hanford Air Operating Permit	Hanford State Waste Discharge Permit
Central Waste Complex	Yes	Yes	No
200 Area ETF	Yes	Yes	Yes
Liquid Effluent Retention Facility	Yes	Yes	No
LLW Trenches	Not Applicable	Not Applicable	Not Applicable
MLLW Trenches	Yes ^(a)	Yes	No
T Plant Complex	Yes ^(a)	Yes	No
Waste Receiving and Processing Facility	Yes	Yes	No
(a) Interim status currently, final status in process.			

25
 26 DOE would obtain appropriate required permits for any new or modified facility. For example, a new
 27 waste processing facility would require a variety of approvals, permits, or permit modifications, including
 28 a modification to the dangerous waste portion of the Hanford RCRA permit, submission of a notice of
 29 construction to the WDOH, modification of the Hanford Air Operating Permit, construction approval by
 30 EPA under 40 CFR 61, and/or approval from EPA under TSCA and the regulations in 40 CFR 761(d), if
 31 waste containing PCBs is treated or disposed of at the facility. Permits might be required for operating
 32 pulse driers to process leachate. New immobilized low-activity waste (ILAW) trenches could also require

1 a variety of approvals, permits, or permit modifications, including a modification to the dangerous waste
 2 portion of the Hanford RCRA permit. The ILAW disposal facility would be subject to the landfill design
 3 requirements as specified in “Standards for Owners and Operators of Hazardous Waste Treatment,
 4 Storage, and Disposal Facilities” (40 CFR 264, Subpart N), and WAC 173-303-665. The primary design
 5 features mandated by these regulations are the leachate collection system and the trench liner system
 6 (double liners, primary, and secondary).

7
 8 The list of permits and approvals that may be required to implement the ILAW disposal alternatives is
 9 provided in Table 6.2. In some cases, specific operating requirements or pollution control equipment
 10 would be required to ensure compliance with air and water quality regulations.

11 **Table 6.2.** Potential Permits and Approvals Needed for ILAW Storage and Disposal
 12
 13

Activity and Waste Type	Regulatory Action Required	Regulation or Directive	Regulatory Agency
Air emissions	Controls for new sources of toxic and hazardous air pollutants (approval)	WAC 173-460, 40 CFR 61	Ecology and EPA
Air emissions	Notice of Construction (approval), licensing, and possible site-wide air operating permit modification (permit)	WAC 173-400, WAC 246-247	Washington State Department of Health and Ecology
Dangerous (including mixed) waste generation, storage, treatment, and disposal	Dangerous waste permit, RCRA permit (permit)	WAC 173-303, 40 CFR 260-280	Ecology EPA
Radiological	Disposal authorization statement	DOE M 435.1-1	DOE

14
 15 **6.20 References**
 16

17 10 CFR 71. “Packaging and Shipping of Radioactive Materials.” U.S. Code of Federal Regulations.
 18 Online at: http://www.access.gpo.gov/nara/cfr/waisidx_01/10cfr71_01.html.

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 20 10 CFR 830. “Nuclear Safety Management.” U.S. Code of Federal Regulations. Online at:
 21 http://www.access.gpo.gov/nara/cfr/waisidx_02/10cfr830_02.html.

22
 23 10 CFR 835. “Occupational Radiation Protection.” U.S. Code of Federal Regulations. Online at:
 24 http://www.access.gpo.gov/nara/cfr/waisidx_02/10cfr835_02.html.

25
 26 10 CFR 1021. “DOE National Environmental Policy Act Implementing Procedures.” U.S. Code of
 27 Federal Regulations. Online at: http://www.access.gpo.gov/nara/cfr/waisidx_02/10cfr1021_02.html.