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TO: Files – Southern California Edison, San Onofre Nuclear Generating Station (SONGS)

FROM: Walter Bahm
Standardized Permitting and Corrective Action Branch

DATE: December 14, 2004

SUBJECT: LIST OF REVISIONS TO THE DRAFT HAZARDOUS WASTE FACILITY PERMIT

Public comments were solicited during the 45-days comment period, from August 8, 2003 to September 23, 2003, on the draft Hazardous Waste Facility Permit (Draft Permit) for the mixed waste storage facilities at the Southern California Edison San Onofre Nuclear Generating Station (SONGS). Based on comments received, including comments from SONGS on the Draft Permit (Attachment), DTSC re-examined the SONGS operation and prepared the responses. The Draft Permit has been changed to correct typographical errors or to clarify operations.

The following is a synopsis of the changes made to the Draft Permit for SONGS. A detailed explanation of the permit changes appear in the Attachment. Those changes are considered administrative changes for clarification purpose only.

1. Table of Content – Table 9 "Mixed Waste and Combined Waste Streams Potentially Eligible for Storage Extension" was deleted.

   Reason: See Attachment, Comment and Response #21-27
   There is no material impact on the Draft Permit requirements or conditions.

2. Section II.4, 7th paragraph now reads:

   The South Yard facility-Batch Plant may be accessed by a roadway from the ~~south~~ north or from the West. This unit features secondary containment berms and below grade sumps in each of the storage sections (A, B and C). Section A has a total secondary containment capacity of ~~3,600~~ 13,400 gallons. Section B and C share spill berms and have a total secondary containment capacity of ~~11,500~~ 47,000 gallons.

   Reason: see Attachment, Comments and Responses #21-1 and #21-2.

There is no material impact on the Draft Permit requirements or conditions.

3. Section II.4, first sentence of last paragraph now reads:

To the west of the SYF-BP is the 119'x130' Multipurpose Handling Facility (MPHF). This structure provides additional shielding to allow for storage of materials and mixed waste and/or combined waste of higher ~~activity~~ radioactivity.

Reason: See Attachment Comment and Response #21-3
There is no material impact on the Draft Permit requirements or conditions.

4. Section III.2(c) now reads:

(c) The Permittee is permitted to store mixed waste and combined waste generated at the Main Site in accordance with the conditions of this Permit. Any treatment or storage of mixed wastes, combined wastes or hazardous wastes not specifically authorized in this Permit or otherwise authorized by DTSC under Health and Safety Code section 25201 is strictly prohibited.

Reason: see Attachment Comment and Response #21-4
There is no material impact on the Draft Permit requirements or conditions.

5. Part IV for the South Yard Facility-Batch Plant, last paragraph of Physical Description now reads:

~~A 1,900 gallon portable tank, used for waste oil storage under Conditional Exemption, is located in section "□". A portable oil separator (cone-shaped tank), operating under Conditional Authorization, is located in Section "B".~~ A 1,900-gallon empty tank is in Section B for emergency use to store spillage wastewater. Each of the ~~three~~ two sections (A and B) has an 800 gallon sump. Section C has a 450-gallon sump. ~~and is separated~~ All three sections are surrounded by a minimum of 6 inch high berm to provide secondary containment. The total secondary containment capacity for all three sections is more than ~~40,000~~ 60,000 gallons. The entire pad is covered by a steel framed roof.

Reason: see Attachment Comments and Responses #21-7, 21-8, 21-9 and 21-10
There is no material impact on the Draft Permit requirements or conditions.

6. Part IV for the South Yard Facility-Batch Plant, paragraph under Maximum Capacity now reads:

The maximum mixed waste and combined waste capacity limit for Section A and B is 46,150 gallons. Section A is limited to 16,500 gallons and Section B is limited to

29,650 gallons. Types and quantities of containers may vary but the total waste volume in storage at any time shall not exceed 46,150 gallons (See Table 8).

~~Maximum capacity for each section (A or B) of the SYF-BP is limited to a total of 23,075 gallons of mixed waste and combined waste in drums, containers or 3.5 cubic yard boxes (see Table 8).~~

Reason: See Attachment Comment and Response #21-11
There is no material impact on the Draft Permit requirements or conditions.

7. Part IV for the South Yard Facility-Batch Plant, first paragraph under Waste Types now reads:

All mixed waste or combined waste are to be stored in sealed containers. ~~More than 50% of the waste generated will be in solid or solidified form.~~ There may be ~~by~~ multiple constituents in the wastes such that several waste codes may be packaged in the same container. Combined waste with any of thirty-one California waste codes listed in Table 2 may be stored in the SYF-BP (~~Table 2~~). Mixed waste with any of thirteen ~~fourteen~~ RCRA waste codes listed in Table 3 may be stored in the SYF-BP (~~Table 3~~).

Reason: see Attachment Comment and Response #21-12, and correct a typographical error
There is no material impact on the Draft Permit requirements or conditions.

8. Part IV for the South Yard Facility-Batch Plant, item (3) under Unit Specific Special Conditions now reads:

The maximum mixed waste and combined waste capacity limit for section A and B is 46,150 gallons. Section A is limited to 16,500 gallons and Section B is limited to 29,650 gallons. Types and quantities of containers may vary but the total waste volume in storage shall not exceed 46,150 gallons (see Table 8). Each metal box used is equivalent to 220 gallons (or four 55-gallon drums).

~~Maximum number and type of containers used to store mixed waste and combined waste are designated in Table 8.~~

Reason: see Attachment Comment and Response # 21-13
There is no material impact on the Draft Permit requirements or conditions.

9. Part IV for the Low Specific Activity (LSAW) Mixed Waste and Combined Waste Storage Area, the first sentence in the second paragraph under Physical Description, was corrected as follows:

The MPHF is a reinforced concrete structure designed to provide a high level of shielding by using ~~at~~ two-foot thick concrete and steel reinforced walls.

Reason: To correct a typographical error
There is no material impact on the Draft Permit requirements or conditions.

10. Part IV for the Low Specific Activity (LSAW) Mixed Waste and Combined Waste Storage Area, paragraph under Maximum Capacity now reads:

The maximum mixed waste and combined waste capacity limit for the LSAW is 8,050 gallons. Types and quantities of containers may vary but the total waste volume in storage at any time shall not exceed 8,050 gallons (see Table 8).

~~Maximum capacity is limited to 8,050 gallons of mixed waste and combined waste in drums, containers or 3.5 cubic yard boxes (see Table 8).~~

Reason: see Attachment Comment and Response #21-14
There is no material impact on the Draft Permit requirements or conditions.

11. Part IV for the Low Specific Activity (LSAW) Mixed Waste and Combined Waste Storage Area, the first paragraph under Waste Types now reads as follows:

All mixed waste or combined waste are to be stored in sealed containers. ~~More than 50% of the waste generated will be in solid or solidified form.~~ All waste within a 3.5 cubic yard or 1.75 cubic yard box shall be solid or in a solidified form. There may be ~~by~~ multiple constituents in the wastes such that several waste codes may be packaged in the same container. Combined waste with any of thirty-one California waste codes listed in Table 4 may be stored in the LSAW ~~(Table 4)~~. Mixed waste with any of thirteen ~~twelve~~ RCRA waste codes listed in Table 5 may be stored in the LSAW ~~(Table 5)~~. See waste stream description in Appendix A.

Reason: see Attachment Comment and Response #21-15, and correct typographical errors)
There is no material impact on the Draft Permit requirements or conditions.

12. Part IV for the Low Specific Activity (LSAW) Mixed Waste and Combined Waste Storage Area, Table 5 added "D002", under RCRA Waste Codes; and "Corrosive liquid/solid sludge" under Description in Table 5.

Reason: see Attachment Comment and Response #21-16
There is no material impact on the Draft Permit requirements or conditions.

13. Part IV for the Low Specific Activity (LSAW) Mixed Waste and Combined Waste Storage Area, under Unit Specific Special Conditions now read:

(1) Spill control pallets and/or over packs shall be used to provide added secondary containment and separation for corrosive waste.

(2) The maximum mixed waste and combined waste capacity limit for the LSAW is 8,050 gallons. Types and quantities of containers may vary but the total waste volume in storage at any time shall not exceed 8,050 gallons (see Table 8). Each metal box used is equivalent to 220 gallons (or four 55-gallons drums).

~~Maximum number and type of containers used to store mixed waste and combined waste are designated in Table 8.~~

Reason: see Attachment Comments and Responses #21-17, and #21-18
There is no material impact on the Draft Permit requirements or conditions.

14. Part IV for the High Specific Activity (HSAW) Mixed Waste and Combined Waste Storage Area, under Activity Description now reads:

Containerized mixed waste and combined waste, in sealed containers with radiation levels above 1 REM/hr are placed in the HSAW storage area depending on their waste characteristics and available storage space. To potentially reduce worker exposure to radioactivity to as low as reasonably achievable, mixed waste and combined waste with less than 1 REM/hr may be stored in HSAW**.**

Reason: see Attachment Comment and Response #21-19
There is no material impact on the Draft Permit requirements or conditions.

15. Part IV for the High Specific Activity (HSAW) Mixed Waste and Combined Waste Storage Area, the first sentence in the second paragraph under Physical Description, now reads:

The MPHF is a reinforced concrete structure designed to provide a high level of shielding by using ~~at~~ two-foot thick concrete and steel reinforced walls.

Reason: To correct a typographical error
There is no material impact on the Draft Permit requirements or conditions.

16. Part IV for the High Specific Activity (HSAW) Mixed Waste and Combined Waste Storage Area, under Maximum Capacity now reads:

The maximum mixed waste and combined waste capacity limit for the HSAW is 8,050 gallons. Types and quantities of containers may vary but the total waste volume in storage at any time shall not exceed 8,050 gallons (see Table 8).

~~Maximum capacity is limited to 8,050 gallons of mixed waste and combined waste in drums, containers or 3.5 cubic yard boxes (see Table 8).~~

Reason; see Attachment Comment and Response #21-20
There is no material impact on the Draft Permit requirements or conditions.

17. Part IV for the High Specific Activity (HSAW) Mixed Waste and Combined Waste Storage Area, the first paragraph under Waste Types now begins as follows:

All mixed waste or combined waste are to be stored in sealed containers. ~~More than 50% of the waste generated will be in solid or solidified form.~~ There may be ~~by~~ multiple constituents in the wastes such that several waste codes may be packaged in the same container. Combined waste with any of thirty-one California waste codes listed in Table 6 may be stored in the HSAW ~~(Table 6~~). Mixed waste with any of thirteen ~~twelve~~ RCRA waste codes listed in Table 7 may be stored in the HSAW ~~(Table 7)~~. See waste stream description in Appendix A.

Reason: see Attachment Comment and Response #21-21
There is no material impact on the Draft Permit requirements or conditions.

18. Part IV for the High Specific Activity (HSAW) Mixed Waste and Combined Waste Storage Area, in Table 7 added "D002", under RCRA Waste Codes; and "Corrosive liquid/solid sludge" under Description.

Reason: see Attachment Comment and Response #21-22
There is no material impact on the Draft Permit requirements or conditions.

19. Part IV for the High Specific Activity (HSAW) Mixed Waste and Combined Waste Storage Area, under Unit Specific Special Conditions, Condition #2 was modified and a new Condition #3 was added as follows:

(2) The maximum mixed waste and combined waste capacity limit for the HSAW is 8,050 gallons. Types and quantities of containers may vary but the total waste volume in storage at any time shall not exceed 8,050 gallons (see Table 8). Each metal box used is equivalent to 220 gallons (or four 55-gallons drums).

~~Maximum number and type of containers used to store mixed waste and combined waste are designated in Table 8.~~

(3) Spill control pallets and/or over packs shall be used to provide added secondary containment and separation for corrosive waste.

Reason: see Attachment Comments and Responses #21-23 and #21-24, and correct typographical errors
There is no material impact on the Draft Permit requirements or conditions.

20. Part IV, Table 8 has been simplified as follows:

Table 8: Mixed Waste and Combined Waste Storage Limits for SONGS

Unit #	Facility Name	Mixed Waste and Combined Waste Storage Units	Types ~~and Quantities~~ of Containers*	Waste Volume Limit (gal)
1	SYF-BP	Sections A and B only.	~~800x~~ 55-gal Drums ~~5x~~ 3.5 yd^3 Metal Boxes** ~~30x~~ 30-gal Containers ~~30x~~ 5-gal Containers	46,150
2	MPHF	Low Specific Activity Waste (LSAW) Storage Area.	~~100x~~ 55-gal Drums ~~10x~~ 3.5 yd^3 Metal Boxes** ~~10x~~ 30-gal Containers ~~10x~~ 5-gal Containers	8,050
3	MPHF	High Specific Activity Waste (HSAW) Storage Area.	~~100x~~ 55-gal Drums ~~10x~~ 3.5 yd^3 Metal Boxes** ~~10x~~ 30-gal Containers ~~10x~~ 5-gal Containers	8,050

Note: * ~~Designates maximum number of specified container types used to store mixed waste and combined waste.~~ Other types of containers may be used, including 40 cubic yard (yd^3) roll-off bins in the SYF-BP. Any combination of container types is limited to the storage unit's waste volume limit.

** ~~The~~ A 3.5 yd^3 or 1.75 yd^3 metal box represents an equivalent of 220 gallons of solidified mixed waste and combined waste.

Reason: see Attachment Comments and Responses #21-11, and #21-25
There is no material impact on the Draft Permit requirements or conditions.

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21. Section V.1(d) was deleted because the maximum waste volumes have been clearly identified under each specific unit condition.

~~(d) The maximum permissible number and type of containers used to store mixed waste and combined waste are designated in Table 8.~~

Reason: see Attachment Comment #21-26
There is no material impact on the Draft Permit requirements or conditions.

22. Section V.2(b) deleted the reference to Table 9. Section V.2(b) now reads

(b) DTSC has previously authorized extending storage beyond one year under the Consent Order, docket number HWCA 96/96-2015, dated June 15, 1999 (Consent Order). ~~for waste streams identified in Table 9~~. Upon the effective date of this Permit, the Consent Order will be superseded by this Permit.

Reason: See Attachment Comments and Responses #21-27 and #21-29
There is no material impact on the Draft Permit requirements or conditions.

23. Condition V.2(e) has been deleted.

Reason: see Attachment Comment and Response #21-27
There is no material impact on the Draft Permit requirements or conditions.

24. Condition V.2(f) was modified and renumbered as V.2(e) to read:

~~(f)~~ (e) The Permittee is required to submit a Storage Extension Request to DTSC no later than sixty (60) days prior to exceeding the one year storage limitation for any waste placed into the designated storage areas. Within 45 days of the receipt of the extension request ~~extension~~, DTSC shall inform the Permittee in writing if ~~that~~ the request is deficient and identify the specific information required. DTSC shall make a decision on the extension request within 120 days of the filing of a completed request. The Permittee shall be deemed to be in compliance with the storage time limit while the application is pending review by DTSC. ~~unless the extension is a permit modification~~. The Storage Extension Request shall include:

(1) The description of waste streams, waste codes, quantities, one-year storage expiration date, projected shipment date, and container identification of each waste container that will exceed the one year storage limitation;

(2) The justification or statement of basis for requesting extended storage. The Permittee shall demonstrate the efforts being made to comply with the one-year storage requirement.

~~(3) DTSC within 45 days of the receipt of the request extension shall inform the Permittee in writing that the request is deficient and what specific information is required. DTSC shall make a decision on the extension request within 120 days of the filing of a completed application, unless the extension is consider a permit modification.~~

Reason: see Attachment Comment and Response #21-28
There is no material impact on the Draft Permit requirements or conditions.

25. Part V. Table 9 has been deleted.

Reason: see Attachment Comments and Responses #21-27 and 21-29
There is no material impact on the Draft Permit requirements or conditions.

Attachment:

SONGS Comments on the Draft Hazardous Waste Facility Permit and the DTSC's Responses.

Attachment

SONGS Comments on the Draft Hazardous Waste Facility Permit and DTSC's Responses

Southern California Edison (SCE) made the following comments (#21-1 through 21-29) and proposed changes to the draft Hazardous Waste facility Permit during the public comment period. SCE's comments and proposed changes are in bold prints. DTSC's responses and changes follow SCE's comments.

Comment #21-1
Page 7, 1st paragraph changes:

The South Yard facility-Batch Plant may be accessed by a roadway from the ~~South~~ North or from the West.

(Change the word South to North)

Response #21-1:

A revision has been made to correct the error. There is no material impact on the Draft Permit requirements or conditions.

Comment #21-2
Section A has a total secondary containment capacity of ~~3,600~~ 13,400 gallons. Section B and C share spill berms and have a total secondary containment capacity of ~~11,500~~ 47,000 gallons.

(Change: 3,600 to 13, 400 gallons and 11,500 to 47,000 gallons)

Response #21-2:

The comment is correct per section 4.1 of the Operation Plan. On January 18, 2001 Section A was certified as providing 13,400 gallons of secondary containment capacity, while receiving 50% of a 24-hour, 25-year storm and in spite of being covered by a permanent fixed roof structure. Similarly, sections B and C were certified for a combined secondary containment capacity of 47,000 gallons. The values 3,600 gallons and 11,500 gallons reflected possible reduction in secondary containment due to potentially received rainfall (e.g. no sidewalls) during a blowing 25-year storm event. A revision has been made to reflect the certified secondary containment capacities of 13,400 gallons for section A and 47,000 gallons for sections B and C.

There is no material impact on the Draft Permit requirements or conditions by this correction.

Comment #21-3
Page 7, last paragraph changes:

To the west of the SYF-BP is the 119'x130' Multipurpose Handling Facility (MPHF). This structure provides additional shielding to allow for storage of materials and mixed waste and/or combined waste of higher ~~activity~~ radioactivity.

(Eliminate the word: activity)

Response #21-3:

Correction of deleting the word "activity" has been made. There is no material impact on the Draft Permit requirements or conditions by this change.

Comment #21-4
Page 9, 2. (c) 2nd sentence change:

Any treatment or storage of mixed wastes, combined wastes or hazardous wastes not specifically authorized in this Permit and/or by the tiered permit process, is strictly prohibited.

(Add: and/or by the tiered permit process,)

Response #21-4:

DTSC is aware that SONGS currently operates hazardous waste treatment units under DTSC's Tiered Permitting System. The Hazardous Waste Facility Permit represents the top tier of DTSC's permitting system, while Conditional Authorization and Conditional Exemption permits are referred to as lower tiered units. The lower tiered permits are administered by the Certified Unified Program Agency (CUPA), which for San Diego County is the San Diego County Department of Environmental Health. DTSC has made the following change to the standard permit language:

(c) The Permittee is permitted to store mixed waste and combined waste generated at the Main Site in accordance with the conditions of this Permit. Any treatment or storage of mixed wastes, combined wastes or hazardous wastes not specifically authorized in this Permit or otherwise authorized by DTSC under Health and Safety Code section 25201 is strictly prohibited.

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Comment #21-5
Page 11, under 4 (b)

The Permittee shall submit the certification to the Branch Chief, Standardized Permitting and Corrective Action Branch and shall record and maintain onsite such certification in the facility Operating Record

(Action: This should be moved or eliminated) This requirement can either be achieved via the annual report or incorporated into requirement v.2. The certification requirement is also signed each and every time a mixed waste shipment is made on the manifest.

Response #21-5:

The referenced language and requirements are standard to all Hazardous Waste Facility Permits. DTSC deems that no change to the standard permit language is necessary.

Comment #21-6
Page 11, (5) WASTE MINIMIZATION CONDITIONS:

The SB14 looks at hazardous waste which only a small portion is mixed or combined waste.

(Addition: Add sentence to section)

Response #21-6:

Waste minimization requirements potentially apply to all facilities in California. Waste Minimization Plans and Reports are only mandated for facilities generating 12,000 kilograms and greater of hazardous waste, or 12 kilograms and greater of extremely hazardous waste a year. The referenced language and requirements are standard to all Hazardous Waste Facility Permits. DTSC deems that no change to the standard permit language is necessary.

Comment #21-7
Page 13, 1st sentence change:

~~**A 1900-gallon portable tank, used for waste oil storage under Conditional Exemption, is located in Section "A".**~~

(Eliminate the first sentence; this is not correct)

Response #21-7:

The referenced sentence has been deleted since a 4,900-gallon steel tank located in Section A had been removed. There is no material impact on the Draft Permit requirements or conditions by this deletion.

Comment #21-8
Page 13, 2nd sentence change:
A portable oil separator (cone-shaped tank), operating under Conditional Authorization, is located in ~~Section "B"~~ another building.

(Changes: eliminate "Section B" and add "another building"

Response #21-8:

The referenced sentence has been revised. The oil separator is not in Section B. However, currently there is an empty 1,900-gallon tank in Section B. The purpose of the tank is to store temporarily emergency waste liquid. There is no material impact on the Draft Permit

requirements or conditions. The revision reads “A 1,900-gallon empty tank is in Section B for emergency use to store spillage wastewater.”

Comment #21-9
Page 13, 3rd sentence changes:

Each of the ~~three~~ two sections (A and B) has an 800 gallon sump. ~~and is separated by a minimum 6” high berm to provide secondary containment.~~ Section “C” has a 400-gallon sump. All three sections are surrounded by a minimum 6” high berm to provide secondary containment.

(Changes: change “three” to “two”, and add “(A and B)”, and add new sentences, “Section “C” has a 400-gallon sump. All three sections are surrounded by a minimum 6” high berm to provide secondary containment.”)

Response #21-9:

The comment is correct per Section 4.1 of the Operation Plan. The correction has been made. Sections A and B, each has an 800-gallon sump, and section C has a 450-gallon sump, instead of 800 gallons. The 6” curb surrounding Sections A, B and C provides a 60,000-gallon containment capacity, more than required capacity. The reduction of 350-gallon containment capacity in Section C sump, comparing to the 60,000-gallon containment is insignificant. Therefore the correction will not have any material impact on the permit.

Comment #21-10
Page 13, 4th sentence change:

The total secondary containment capacity for all three sections is more than ~~40,000~~ 60,000 gallons.

(Change: 40,000 to 60,000 gallons)

Response #21-10:

See Response #21-2. The correction has been made. There is no material impact on the Draft Permit requirements or conditions by this correction.

Comment #21-11
Page 13, under MAXIMUM CAPACITY change:
~~Maximum capacity for each section (A or B) of the SYF-BP is limited to a total of 23,075 gallons of mixed waste and combined waste in drums, containers or 3.5 cubic yard boxes (see Table 8).~~

(Change to: The maximum mixed waste and combined waste capacity limit (gals) for section A and B is 46,150 gallons. Section A is limited to 16,500 gallons and Section B is limited to 29,650 gallons. Types and quantities of containers may vary but at no time will the amount exceed 46,150 gallons. For each metal box that exceeds the quantities listed

in Table 8, 220 gallons (or 4x55 gallons drums) will be reduced from the total drum quantities
number. Smaller boxes can be used but each box will constitute 220 gallons of solidified waste.)

Response #21-11:

The description makes references to Tables 1 and 8 of the draft Hazardous Waste Facility Permit. These tables provide the hazardous waste volume limits, and the types of containers. The total allowed storage capacity in Section A and Section B is 46,150 gallons. Since Section B is larger than Section A in area (50' by 80', 30' by 60' respectively), more storage capacity will be assigned to Section B. Therefore revision has been made to reflect that section A is limited to 16,500 gallons and Section B is limited to 29,650 gallons. The text has been revised as follows:

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> **"**The maximum mixed waste and combined waste capacity limit for Section A and B is 46,150 gallons. Section A is limited to 16,500 gallons and Section B is limited to 29,650 gallons. Types and quantities of containers may vary but the total waste volume in storage at any time shall not exceed 46,150 gallons (See Table 8)"

Both the footnote to Table 8 in the Draft Permit, and Section 4.1 of the Operation Plan indicated that any combination of container types is limited to the storage unit's waste volume. In Table 8, the numbers listed in the column of "Types and Quantities of Containers" is only illustration of typical storage containers used. SONGS, however may use different types and numbers of containers when necessary, but total capacity must not be exceeded.

Table 8 has been revised as follows:

- Column heading has been changed to remove reference to container quantities
- Maximum container quantities for each storage area has been removed.

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The Footnote for Table 8 has been revised as follows:

The first sentence has been deleted. The footnotes have been changed to read "

Note: * ~~Designates maximum number of specified container types used to store mixed waste and combined waste.~~ Other types of containers may be used, including 40 cubic yard (yd^3) roll-off bins in the SYF-BP. Any combination of container types is limited to the storage unit's waste volume limit.

** ~~The~~ A 3.5 yd^3 or 1.75 yd^3 metal box represents an equivalent of 220 gallons of solidified mixed waste and combined waste.

The proposed change is intended to help clarify the facility's operational flexibility in storing in 55-gallon drums or a variety of container types such as roll-off bins, metal boxes, 30-gallon and 5-gallon containers.

Since the number and size of containers may vary, Special Condition V(d) on the maximum permissible number and type of containers used to store mixed waste and combined waste has been deleted from the Draft Permit.

There is no material impact on the Draft Permit requirements or conditions by this change.

Comment #21-12
Page 13, under WASTE TYPES changes:

All mixed waste or combined wastes are to be stored in sealed containers. All waste within a 3.5 cubic yard or 1.75 cubic yard box will be solid or in a solidified form. More than ~~50%~~ 20% of the waste generated will be in solid or solidified form.

(Change: Add sentence, " All waste within a 3.5 cubic yard or 1.75 cubic yard box will be solid or in a solidified form", and change 50% to 20%.)

Response #21-12:

The percentage of waste in solid form varies. This sentence was only intended to be descriptive and not to specify a fixed solidified percentage. The sentence beginning with "More than…" has been removed to avoid unnecessary confusion. There was a typographical error in the number of RCRA waste codes. It should be 13, not 14 codes. The paragraph has been revised to read "All mixed waste or combined waste are to be stored in sealed containers. There may be multiple constituents in the wastes such that several waste codes may be packaged in the same container. Combined waste with any of thirty-one California waste codes listed in Table 2 may be stored in the SYF-BP. Mixed waste with any of thirteen RCRA waste codes listed in Table 3 may be stored in the SYF-BP."

There is no material impact on the Draft Permit requirements or conditions.

Comment #21-13
Page 15, under UNIT SPECIFIC SPECIAL CONDITIONS # (3) change:

~~(3) Maximum number and type of containers used to store mixed waste and combined waste are designated in Table 8.~~

(Change to: The maximum mixed waste and combined waste capacity limit (gals) for section A and B is 46,150 gallons. Section A is limited to 16,500 gallons and Section B is limited to 29,650 gallons. Types and quantities of containers may vary but at no time will the amount exceed 46,150 gallons. For each metal box that exceeds the quantities listed in Table 8, 220 gallons (or 4x55 gallons drums) will be reduced from the total drum quantities number. Smaller boxes can be used but each box will constitute 220 gallons of solidified waste.)

Response #21-13:

See Response #21-11 on Table 8 which has been revised.

Condition #3 makes reference to Table 8 which summarizes the storage limits for each of the three mixed waste storage units. The proposed language does not change the allowed total capacity of 46,150 gallons and is a restatement of the permit limits reflected in Table 8.

Condition #3 has been revised to read as
"The maximum mixed waste and combined waste capacity limit for Section A and B is 46,150 gallons. Section A is limited to 16,500 gallons and Section B is limited to 29,650 gallons. Types and quantities of containers may vary but the total waste volume in storage at any time shall not exceed 46,150 gallons (See Table 8). Each metal box used is equivalent to 220 gallons (or four 55-gallons drums). "

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There is no material impact on the Draft Permit requirements or conditions.

Comment #21-14
Page 17, under MAXIMUM CAPACITY change:

~~Maximum capacity is limited to 8,050 gallons of mixed waste and combined waste in drums, containers or 3.5 cubic yard boxes (see Table 8).~~

Change to: The maximum mixed waste and combined waste capacity limit (gals) for the LSAW is 8,050 gallons. Types and quantities of containers may vary but at no time will the amount exceed 8,050 gallons. For each metal box that exceeds the quantities listed in Table 8, 220 gallons (or 4x55 gallons drums) will be reduced from the total drum quantities number. Smaller boxes can be used but each box will constitute 220 gallons of solidified waste.)

Response #21-14

See Response #21-11 on Table 8.

The description makes reference to Table 8 which summarizes the storage limits for each of the three mixed waste storage units. The proposed language does not change the allowed capacity of 8,050 gallons and is a restatement of the permit limits reflected in Table 8.

The revision has been made to read "The maximum mixed waste and combined waste capacity limit for the LSAW is 8,050 gallons. Types and quantities of containers may vary but the total waste volume in storage at any time shall not exceed 8,050 gallons (see Table 8)."

There is no material impact on the Draft Permit requirements or conditions.

Comment #21-15
Page 17, under WASTE TYPES change:

All mixed waste or combined wastes are to be stored in sealed containers. All waste within a 3.5 cubic yard or 1.75 cubic yard box will be solid or in a solidified form. More than ~~50%~~ 20% of the waste generated will be in solid or solidified form.

(Change: Add sentence, " All waste within a 3.5 cubic yard or 1.75 cubic yard box will be solid or in a solidified form", and change 50% to 20%.)

Response #21-15:

See Response #21-12. The paragraph has been revised to read "All mixed waste or combined waste are to be stored in sealed containers. All waste within a 3.5 cubic yard or 1.75 cubic yard box shall be solid or in a solidified form. There may be multiple constituents in the wastes such that several waste codes may be packaged in the same container. Combined waste with any of thirty-one California waste codes listed in Table 4 may be stored in the LSAW . Mixed waste with any of thirteen-RCRA waste codes listed in Table 5 may be stored in the LSAW . See waste stream description in Appendix A."

There is no material impact on the Draft Permit requirements or conditions by these changes.

Comment #21-16
Page 18, Table 5 changes:

(Changes: Add D002, under RCRA Waste Codes; and Corrosive liquid/solid sludge under Description to Table 5.)

Response #21-16:

The LSAW allows for the storage of corrosive solutions via the California waste codes listed as 122, 123, 131, 791, 792 in Table 4. However, the federal equivalent code D002 was not included in Table 5. To correct this DTSC has added D002 to Table 5. The unit now can handle 13 RCRA waste codes, instead of 12 RCRA waste codes.

There is no material impact on the Draft Permit requirements or conditions.

Comment #21-17
Page 18, under UNIT SPECIFIC SPECIAL CONDITIONS #(1), changes:

(1) Spill control pallets and/or over packs shall be used to provide added secondary containment and separation for corrosive waste.

(Change: Add, "and/or over packs")

Response #21-17:

The proposed language is accepted as it better clarifies the activity. The over packs will provide added separation. The correction has been made. There is no material impact on the Draft Permit requirements or conditions.

Comment #21-18
Page 18, under UNIT SPECIFIC SPECIAL CONDITIONS #(2) changes:

~~**(2) Maximum number and type of containers used to store mixed waste and combined waste are designated in Table 8.**~~

(Change to: The maximum mixed waste and combined waste capacity limit (gals) for the LSAW is 8,050 gallons.
Types and quantities of containers may vary but at no time will the amount exceed 8,050 gallons. For each metal box that exceeds the quantities listed in Table 8, 220 gallons (or 4x55 gallons drums) will be reduced from the total drum quantities number. Smaller boxes can be used but each box will constitute 220 gallons of solidified waste.)

Response #21-18:

Please see Response #21-11 on Table 8.

Condition #2 makes reference to Table 8 which summarizes the storage limits for each of the three mixed waste storage units. The proposed language is a restatement of the permit limits reflected in Table 8. The revision has been made to read "The maximum mixed waste and combined waste capacity limit for the LSAW is 8,050 gallons. Types and quantities of containers may vary but the total waste volume in storage at any time shall not exceed 8,050 gallons (see Table 8). Each metal box used is equivalent to 220 gallons (or four 55-gallons drums)."

There is no material impact on the Draft Permit requirements or conditions.

Comment #21-19
Page 19, under ACTIVITY DESCRIPTION change:

Containerized mixed waste and combined waste, in sealed containers with radiation levels above 1 REM/hr are placed in the HSAW storage area depending on their waste characteristics and available storage space. To potentially reduce dose, mixed waste and combined waste with less than 1 REM/hr may be stored in the HSAW.

(Change: Add sentence, "To potentially reduce dose, mixed waste and combined waste with less than 1 REM/hr may be stored in the HSAW.")

Response #21-19:

The comment is to describe that SONGS stores mixed waste in HSAW even when the radioactivity is below 1 REM/hr. This is to reduce SONGS worker exposure to radioactivity to as low as reasonably achievable (ALARA) and to provide worker safety as much as practical.

A sentence has been added to read "To potentially reduce worker exposure to radioactivity to as low as reasonably achievable, mixed waste and combined waste with less than 1 REM/hr may be stored in HSAW." There is no material impact on the Draft Permit requirements or conditions.

Comment #21-20
Page 20, under MAXIMUM CAPACITY change:

~~**Maximum capacity is limited to 8,050 gallons of mixed waste and combined waste in drums, containers or 3.5 cubic yard boxes (see Table 8).**~~

(Change to: The maximum mixed waste and combined waste capacity limit (gals) for the HSAW is 8,050 gallons. Types and quantities of containers may vary but at no time will the amount exceed 8,050 gallons. For each metal box that exceeds the quantities listed in Table 8, 220 gallons (or 4x55 gallons drums) will be reduced from the total drum quantities number. Smaller boxes can be used but each box will constitute 220 gallons of solidified waste.)

Response #21-20:

See Response #21-11 on Table 8. The description makes reference to Table 8 which summarizes the storage limits for each of the three mixed waste storage units. The proposed language is a restatement of the permit limits reflected in Table 8.

The revision has been made to read "The maximum mixed waste and combined waste capacity limit for the HSAW is 8,050 gallons. Types and quantities of containers may vary but the total waste volume in storage at any time shall not exceed 8,050 gallons (see Table 8)."

There is no material impact on the Draft Permit requirements or conditions.

Comment #21-21
Page 20, under WASTE TYPES changes:

All mixed waste or combined wastes are to be stored in sealed containers. All waste within a 3.5 cubic yard or 1.75 cubic yard box will be solid or in a solidified form. More than ~~50%~~ 20% of the waste generated will be in solid or solidified form.

(Change: Add sentence, " All waste within a 3.5 cubic yard or 1.75 cubic yard box will be solid or in a solidified form", and change 50% to 20%.)

Response #21-21:

Please see Response #21-12. The paragraph has been revised to read "All mixed waste or combined waste are to be stored in sealed containers. There may be multiple constituents in the wastes such that several waste codes may be packaged in the same container. Combined waste with any of thirty-one California waste codes listed in Table 6 may be stored in the HSAW. Mixed waste with any of thirteen RCRA waste codes listed in Table 7 may be stored in the HSAW. See waste stream description in Appendix A."

Comment #21-22
Page 21, under Table 7 changes:

(Changes: Add D002, under RCRA Waste Codes; and Corrosive liquid/solid sludge under Description to Table 5.)

Response #21-22:

The HSAW allows for the storage of corrosive solutions via the California waste codes listed as 122, 123, 131, 791, 792 in Table 6. However, the federal equivalent code D002 was not included in Table 7. The waste code has been added to Table 7. There is no material impact on the Draft Permit requirements or conditions.
Comment #21-23

Page 21, under UNIT SPECIFIC CONDITIONS, #(2) changes:

~~**(2) Maximum number and type of containers used to store mixed waste and combined waste are designated in Table 8.**~~

(Change to: The maximum mixed waste and combined waste capacity limit (gals) for the HSAW is 8,050 gallons. Types and quantities of containers may vary but at no time will the amount exceed 8,050 gallons. For each metal box that exceeds the quantities listed in Table 8, 220 gallons (or 4x55 gallons drums) will be reduced from the total drum quantities number. Smaller boxes may be used but each box will constitute 220 gallons of solidified waste.)

Response #21-23:

See Response #21-11 on Table 8. The condition makes reference to Tables 1 and 8 which summarize the storage limits for each of the three mixed waste storage units. The proposed language is a restatement of the permit limits reflected in Table 8. The revision has been made to read "The maximum mixed waste and combined waste capacity limit for the HSAW is 8,050 gallons. Types and quantities of containers may vary but the total waste volume in storage at any time shall not exceed 8,050 gallons (see Table 8). Each metal box used is equivalent to 220 gallons (or four 55-gallons drums)."

There is no material impact on the Draft Permit requirements or conditions.

Comment #21-24
Page 21, under UNIT SPECIFIC SPECIAL CONDITIONS #(3), changes:

(3) Spill control pallets and/or over packs shall be used to provide added secondary containment and separation for corrosive waste.

(Change: Add: condition #3, "(3) Spill control pallets and/or over packs shall be used to provide added secondary containment and separation for corrosive waste.")

Response #21-24:

Condition has been added to be consistent with the operation condition for LSAW. The added permit condition ensures better spill control and there is no material impact on the Draft Permit requirements or conditions.

Comment #21-25
Page 22, Table 8, note changes:

***Types and quantities of containers may vary but at no time will the total volume be exceeded. ~~Designates maximum number of specified container types used to store mixed waste and combined waste.~~ Any combination of container types is limited to the storage unit's waste volume limit. For each metal box that exceeds the quantities listed in Table 8; a total of 220 gallons (4x 55-gal drums) will be reduced from the total drum quantities number, but ensuring that the waste volume limit for the storage facility is never exceeded.**

**** The 3.5 yd^3 box represents and equivalent of 220 gallons of solidified mixed waste and combined waste. Smaller boxes may be used but each box will constitute 220 gallons of solidified waste.**

(Change: Add, "Types and quantities of containers may vary but at no time will the total volume be exceeded." And delete, "~~Designates maximum number of specified container types used to store mixed waste and combined waste.~~ " and add, "For each metal box that exceeds the quantities listed in Table 8; a total of 220 gallons (4x 55-gal drums) will be reduced from the total drum quantities number, but ensuring that the waste volume limit for the storage facility is never exceeded.". Also add to ** section, "Smaller boxes may be used but each box will constitute 220 gallons of solidified waste.")

Response #21-25

See Response #21-11 on Table 8. The proposed change does not change the allowed total storage capacity and the new language is a restatement of the footnotes, which clarifies and better elaborates on the intended operational flexibility. There is no material impact on the Draft Permit requirements or conditions.

Comment #21-26
Page 23, under V 1(d) changes:

(d) The maximum permissible number and type of containers used to store mixed waste and combined waste are designated in Table 8.

(OK provided the following notes are added to the Table 8: If this is a problem than Table 8; 3.5 cubic yard box numbers need to change in the SYF-BP to 100, thus reducing the 55-gallon drum number to 420. Also note that smaller boxes may be used, but 220 gallon conversion factors will be used for these as well.)
Types and quantities of containers may vary but at no time will the total volume be exceeded. ~~Designates maximum number of specified container types used to store mixed waste and combined waste.~~ Any combination of container types is limited to the storage unit's waste volume limit. For each metal box that exceeds the quantities listed in Table 8; a total of 220 gallons (4x 55-gal drums) will be reduced from the total drum quantities number, but ensuring that the waste volume limit for the storage facility is never exceeded.

**** The 3.5 yd^3 box represents and equivalent of 220 gallons of solidified mixed waste and combined waste. Smaller boxes may be used but each box will constitute 220 gallons of solidified waste.**

Response #21-26

See Response #21-11 on Table 8. The condition V.1(d) has been deleted as it repeated the special conditions listed under each unit. There is no material impact on the Draft Permit requirements or conditions by this change.

Comment #21-27
Page 24, under 2(e) changes:

~~**A permit modification shall be required prior to waste from any waste stream or waste code not identified in Table 9 exceeding the one-year storage limitation.**~~
A permit modification shall be required prior to waste from any waste stream or waste code not identified within this permit, which will exceed the one-year storage limitation.

(Change: delete "~~A permit modification shall be required prior to waste from any waste stream or waste code not identified in Table 9 exceeding the one-year storage limitation.~~" And add, " A permit modification shall be required prior to waste from any waste stream or waste code not identified within this permit, which will exceed the one-year storage limitation.")

Response #21-27:

Appendix A in the Draft Permit is a complete list of all mixed and combined waste currently authorized for storage at SONGS. Table 9 in the Draft Permit listed waste streams that SONGS had stored for greater than one-year, as well as other waste streams potentially needing storage extensions due to limited off-site treatment and disposal capacity.

Since the public notice of the draft Hazardous Waste Facility Permit, SONGS has been able to ship, for off-site treatment, all wastes stored in excess of one-year. Currently there is no waste needing extended storage. Table 9 has been deleted.

Additionally, Condition V.2(e) has been deleted because it is unnecessary and Condition V.2.(f) has been modified accordingly (see Response #21-28).

The California Code of Regulations requires SONGS to submit a permit modification request to DTSC before SONGS may store any waste streams or waste codes not listed in Appendix A in the permitted units. Condition V.2.(f) has been renumbered V.2(e)

~~For any new waste streams, or waste codes not identified in Appendix A, SONGS shall submit a permit modification request for DTSC's approval per Section 66270.42, Title 22, California Code of Regulations, prior to storing any new waste streams or waste codes for greater than one year. The public will have opportunities to comment on the DTSC's environmental analysis on the new waste stream.~~

Comment #21-28
Page 24, (f) (3) comment:
What is this "application"? or can this be accomplished via the semi-annual inventory submittals?

Response #21-28:

The application referred to in section (f)(3) of Part V Special Conditions refers to the Storage Extension Request. The Storage Extension Request is to identify and evaluate the waste, the quantity of waste and the difficulty in finding adequate disposal options.

Condition V.2. f (3) was moved up into (f) because condition (3) is not something that is to be included in the request. Condition V.2.(f) has been revised to read "The Permittee is required to submit a Storage Extension Request to DTSC no later than sixty (60) days prior to exceeding the one year storage limitation for any waste placed into the designated storage areas. Within 45 days of the receipt of the extension request ~~extesnion~~, DTSC shall inform the Permittee in writing if ~~that~~ the request is deficient and identify the specific information required. DTSC shall make a decision on the extension request within 120 days of the filing of a completed request. The Permittee shall be deemed to be in compliance with the storage time limit while the application is pending review by DTSC, ~~unless the extension is considered to be a permit modification.~~ The Storage Extension Request shall include:

(1) The description of waste streams, waste codes, quantities, one-year storage expiration date, projected shipment date, and container identification of each waste container that will exceed the one year storage limitation;

(2) The justification or statement of basis for requesting extended storage. The Permittee shall demonstrate the efforts being made to comply with the one-year storage requirement.

DTSC has substituted "if" for "that" in the second sentence because not all submissions are expected to be deficient. To promote efficient enforcement, the added sentence clarifies SONGS compliance status should DTSC's review of a timely submission by SONGS extend past the one year storage limit. DTSC revised the "request extension" to "extension request" to correct typographical error. DTSC deleted "unless the extension is a permit modification" because it is unnecessary. The California Code of Regulations requires SONGS to submit a permit modification request to DTSC before SONGS may store any waste streams or waste codes not listed in Appendix A in the permitted units.

There is no material impact on the Draft Permit requirements or conditions.

Comment #21-29
Page 25, Table 9 changes:

Delete all of Table 9 and refer to Appendix A. If the Table 9 must be mentioned than all dose rates should be eliminated. In actuality as the dose rate increases for any waste stream the disposal options decrease. If a waste stream identified in Tables 2 through 7

had a high dose or high curie content than the need for an extension due to no disposal facility could be required.

If Table 9 needs to be used also

Page 25, table 9 corrections:

For #3 for freon filters add F002

Page 25, table 9 corrections

For #5 for Hydrazine add U133

Page 25, table 9 add:

#10 Aqueous liquids w/metals - D005, D006, D007, D008, D009, D010, D011 - 181, 551

Page 25, table 9 add:

#11 Solids with metals – D005, D006, D007, D008, D009, D010, D011 – 181, 122

Page 25, table 9 add:

#12 Corrosive Wastes - D002 – 181, 122

Response #21-29:

Table 9 was to describe all waste streams allowed in the storage areas. The information in Table 9 was similar to Appendix A, therefore, Table 9 has been deleted. The reference to Table 9 in Special Condition V.2.(b) of the Draft Permit has been deleted.

THIS IS THE END OF THE COMMENTS FROM SCE-SONGS.