



Puget Sound Naval Shipyard and Intermediate Maintenance Facility Draft Permit Renewal

- Public comment period Aug. 16 - Sept. 30, 2021
- Several changes since the 2006 renewal

Public comment invited

The Washington State Department of Ecology (Ecology) invites the public to comment on the draft Puget Sound Naval Shipyard and Intermediate Maintenance Facility's (PSNS & IMF's) Mixed Waste Storage Facility (MWSF) Dangerous Waste permit renewal.

The permittees are:

United States Department of the Navy (Owner)
1400 Farragut Ave.
Bremerton, WA 98314-2088

Puget Sound Naval Shipyard and Intermediate Maintenance Facility (Operator)
1400 Farragut Ave.
Bremerton, WA 98314-2088

Overview of the MWSF

The MWSF has been in operation since 1996. It stores containers of radiologically contaminated dangerous waste (mixed waste). It is designed for storage of mixed wastes for greater than 90 days.

The MWSF stores containers of waste generated from work on nuclear-powered naval vessels and radiological work performed inside the PSNS & IMF boundary. The MWSF also stores waste generated by PSNS & IMF personnel at offsite facilities owned by the US Navy.

Overview of MWSF construction

The MWSF does not conduct treatment or disposal of any mixed waste. Wastes stored at the MWSF are awaiting shipment for treatment and/or final disposition.

The MWSF is a 54-by-42-foot concrete building with two rooms, a small mechanical room and the main storage bay. The building has two personnel access doors and a large roll-up door. Any of the doors can be used for placement or removal of mixed waste containers. The roof and walls are maintained to prevent water intrusion into the building. The concrete floor of the main storage bay has the following characteristics:

- It is constructed to handle the combined weight of all stored containers and operating equipment.
- It acts as secondary containment for non-ignitable wastes (ignitable waste discussed below).
- It is designed so all portions of the floor slope to the middle where a blind sump is located, and it has a berm around its outer edges.
- The floor surface is coated with chemically resistant material to protect the concrete and prevent infiltration or absorption of any waste spills. This coating is compatible with all waste types in storage in the building.

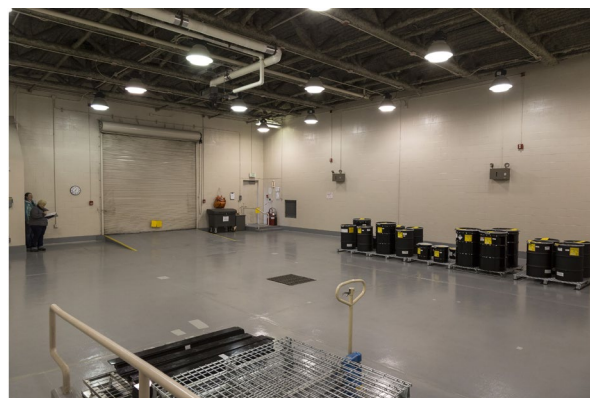


Figure 1 Interior of MWSF

Overview of waste analysis

Wastes acceptable for storage at the MWSF include those exhibiting ignitability, corrosivity, and toxicity characteristics. This includes small amounts of flammable liquids, heavy metals, spent solvents, state listed hazardous wastes, and state listed PCB wastes.

PSNS & IMF is required to ensure that all wastes are compatible with the containers and containment systems they are stored in. All wastes stored in the same containment system inside the MWSF must be compatible with each other.

Overview of container management

PSNS & IMF personnel are required to maintain the following safe container management practices at the MWSF:

- Containers are in good condition and are kept closed when not in use.
- All containers are stored in a sealed, compatible secondary containment system to contain any spills that may occur.
- All containers are clearly marked to show the identification and hazards of the waste and date of storage of the container.
- PSNS & IMF personnel perform weekly inspections to ensure proper storage of containers in the MWSF.
- PSNS & IMF personnel involved with managing MWSF mixed waste are trained to perform their jobs.



Figure 2 Example of typical contents of a container placed in the MWSF

Overview of security and emergency preparedness

The PSNS & IMF site is surrounded by layers of fencing and points of access control. Access gates are manned, and the entire site is under 24-hour surveillance. The MWSF itself is a windowless building with locked doors. Hazard signs are placed at all entrances. PSNS & IMF has a contingency plan in place to respond to leaks, spills, fires, or any identified hazard affecting the MWSF. The MWSF is equipped with alarms and emergency equipment to alert personnel of danger and allow response to any hazards.

Overview of closure

PSNS & IMF has a closure plan in place to close the MWSF. The closure plan includes a schedule for closure and an estimated date of closure set for 2055. The date of closure is based on the expected length of time it will be needed for storage of PSNS & IMF generated mixed waste.

Closure procedures include removal of all mixed waste containers; decontamination of surfaces and equipment; sampling, if necessary, in areas where spills have occurred; and a final IQRPE inspection and report. Ecology uses this report as part of our review to determine if clean closure has been met.

Overview of changes from 2006 permit

The permittees plan changes to MWSF related to storage capacities, acceptable waste codes, emergency equipment, and planned closure activities. These changes will be included in the permit renewal:

- The maximum storage capacity configurations for the MWSF have been reduced to allow aisle spacing requirements to be met for all containers in storage.
- PSNS & IMF will store containers with ignitable waste in a separate storage cabinet designed for that type of waste. This ensures separation and segregation requirements can be met for incompatible wastes.
- The fire alarm control system has been upgraded and moved inside the MWSF.

- Sampling activities will not be needed for clean closure of the MWSF as long as the PSNS & IMF operating record demonstrates that no spills have occurred in the MWSF and that PSNS & IMF have maintained the MWSF floor coating throughout the operating life of the facility.
- Waste streams are identified through generator process knowledge instead of sampling.
- PSNS will use surrogate sampling to confirm the designation of waste streams when necessary.



Figure 3 Exterior of MWSF

Reviewing the proposed changes

Ecology invites you to review and comment on this draft permit for the PSNS & IMF MWSF. See page 1 for comment period dates and information on how to submit comments.

Copies of the application for the proposed permit and supporting documentation will be available during the public comment period online at Ecology's website at Ecology.wa.gov/Waste-Toxics/Nuclear-waste/Public-comment-periods. The documents will also be available at the PSNS & IMF information repositories listed below.

Ecology will consider and respond to all significant comments received during the public comment period. We will document our responses and issue a response to comments document when we make our final permitting decision.

PSNS & IMF Information Repositories and Document Review Locations

Ecology Nuclear Waste
Program
Resource Center
3100 Port of Benton Blvd.
Richland, WA 99354

Downtown Bremerton
Kitsap Regional Library
612 5th St.
Bremerton, WA 98337
360-377-3955

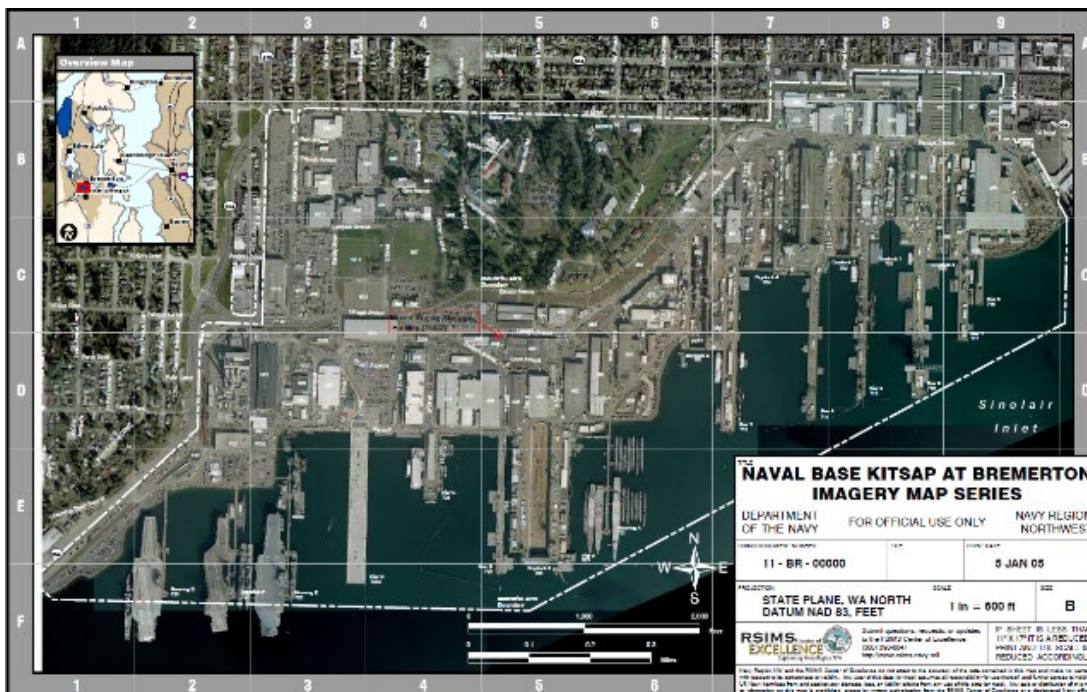


Figure 4 Satellite Map of the PSNS & IMF showing the location of the MWSF from the 2006 Permit



3100 Port of Benton Blvd
Richland WA 99354

PSNS and IMF permit renewal

Public comment period Aug. 16 – Sept. 30. 2021

Electronic submission (preferred):
PSNS and IMF permit renewal

Mail or hand delivery

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Richland, WA 99354

A public hearing is not scheduled, but if there is enough interest, we will consider holding one. To request a hearing or for more information, contact:

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509 372 7950
Hanford@ecy.wa.gov

To request an ADA accommodation, contact Ecology by phone at 509 372 7950, email at Daina.McFadden@ecy.wa.gov, or visit <https://ecology.wa.gov/accessibility>. For Relay Service or TTY call 711 or 877 833 6341.