Department of Energy
Richland Operations Office
P.O. Box 550
Richland, Washington 99352

15-ESQ-0091

JUL 09 2015

Ms. S. L. Dahl-Crumpler
Nuclear Waste Program
Washington State Department of Ecology
3100 Port of Benton Boulevard
Richland, Washington 99354

Dear Ms. Dahl-Crumpler:

CONTRACT DELIVERABLE CD1011, "CLASS 1 MODIFICATIONS TO THE HANFORD FACILITY RESOURCE CONSERVATION AND RECOVERY ACT PERMIT, QUARTER ENDING JUNE 30, 2015"

In accordance with Hanford Facility Resource Conservation and Recovery Act Permit (Permit) Condition I.C.3, enclosed for your notification is a Class 1 Modification for the quarter ending June 30, 2015. Included with this submittal is equivalent material substitution information for the Liquid Effluent Retention Facility and 200 Area Effluent Treatment Facility.

The modification updates information in Part III of Permit Revision 8C. The modification pertains to the Liquid Effluent Retention Facility, the 200 Area Effluent Treatment Facility, and the Waste Treatment and Immobilization Plant. The Class 1 Modification is being made to ensure that activities are conducted in compliance with the Permit. A record of the modification is maintained in the Hanford Facility Operating Record.

If you have any questions, please contact me, or your staff may contact Jeffrey A. Frey, Acting Assistant Manager for Safety and Environment, on (509) 376-7727.

Sincerely,

Stacy Charboneau
Manager

ESQ:ACM

Enclosure

cc w/encl: See page 2

cc w/encl:
J. L. Cantu, Ecology (CD ROM)
R. G. Hastings, ORP (CD ROM)
Admin. Record, TSD: H-0-1, H-0-8, S-2-8, T-2-8. (Hard Copy & CD ROM)
Ecology NWP Library (Hardcopy & CD ROM)
Environmental Portal, LMSI, A3-95 (CD ROM)
Gonzaga University, Foley Center Library (CD ROM)
HF Operating Record (J. K. Perry, MSA, A3-01) (CD ROM)
Portland State University, Govt. Info. (CD ROM)
UW, Suzzallo Library, Govt. Pub. Dept. (CD ROM)
WSU-TC Rdg Rm CIC, (CD ROM)

cc w/o encl:
D. J. Alexander, Ecology
B. M. Barnes, CHPRC
L. E. Borneman, WRPS
A. S. Carlson, Ecology
B. L. Curn, URS
K. A. Hadley, WCH
J. A. Hedges, Ecology
M. E. Jones, Ecology
P. W. Martin, CHPRC
J. D. McDonald, Ecology
S. Murdock, BNI
B. Peck, BNI
J. R. Seaver, CHPRC
R. R. Skinnarland, Ecology
H. T. Tilden, PNNL
M. B. Wilson, MSA

ENCLOSURE

CLASS 1 MODIFICATIONS FOR QUARTER ENDING JUNE 30, 2015
Ms. S. L. Dahl-Crumpler, Ecology

Consisting of 71 pages,
including this cover page

Hanford Facility RCRA Permit Change Notice

Part III, Operating Unit Group 3

Liquid Effluent Retention Facility & 200 Area Effluent Treatment Facility

Index

Submitted by WRPS Co-Operator: Reviewed by DOE-ORP Program Office:

6/10/15 6/10/15

D. Kent Smith Date Thomas W. Fletcher Date

Hanford Facility RCRA Permit Change Notice

Unit: Liquid Effluent Retention Facility & 200 Area Effluent Treatment Facility	Permit Part: Part III, Operating Unit Group 3

Description of Modification:

Part III, Operating Unit Group 3 Permit Conditions

- Updated the dates under the List of Addenda to reflect modification dates:

  Addendum A Part A Form, dated March 31, 2015~~2014~~

  Addendum B Waste Analysis Plan, dated June 30, 2015~~March 31, 2013~~

  Addendum D~~Chapter 5.0~~ Groundwater Monitoring ~~(DOE/RL-2013-46, Rev. 0), dated~~ approved April 29, 2014

  Addendum G Personnel Training, dated June 30, 2015~~2012~~

  Addendum J Contingency Plan, dated June 30, 2015~~March 31, 2012~~

- Permit Condition III.3.B.3.b: added reference to Figure C.4 to clarify the areas permitted for storage, which was inadvertently omitted from the Permit Condition.
- Permit Conditions III.3.C.3, III.3.C.5, III.3.D.1, III.3.O.1.a.1, and III.3.Q.6: modified references to Permit Condition II.I.2 (Facility Operating Record), because that Permit Condition no longer exists in Revision 8C, dated April 28, 2014. The modified references refer to the appropriate Permit Conditions listed under II.I, Facility Operating Record.

WAC 173-303-830 Modification Class [1 2]	Class 1	Class [1]1	Class 2	Class 3
Please mark the Modification Class:	X			

Enter relevant WAC 173-303-830, Appendix I Modification citation number: A.1

Enter wording of WAC 173-303-830, Appendix I Modification citation: Administrative and informational changes.

Modification Approved: [✓] Yes [ ] No (state reason for denial)

Reason for denial:

Reviewed by Ecology:

S. L. Dahl-Crumpler   Date 6/15/15

PART III, OPERATING UNIT GROUP 3 PERMIT CONDITIONS

Liquid Effluent Retention Facility & 200 Area Effluent Treatment Facility

Unit Description:

The Liquid Effluent Retention Facility (LERF) and 200 Area Effluent Treatment Facility(200 Area ETF) consists of an aqueous waste treatment system that provides treatment, storage integral to the treatment process, and storage of secondary wastes from the treatment process for a variety of aqueous mixed waste. The 200 Area ETF is located in the 200 East Area. Aqueous wastes managed by the 200 Area ETF include process condensate from the LERF and 200 Area ETF and other aqueous waste generated from onsite remediation and waste management activities.

The LERF consists of three lined surface impoundments, or basins. Aqueous waste from LERF is pumped to the 200 Area ETF for treatment in a series of process units, or systems, that remove or destroy essentially all of the dangerous waste constituents. The treated effluent is discharged to a State-Approved Land Disposal Site (SALDS) north of the 200 West Area, under the authority of a Washington State Waste Discharge Permit (Ecology 2000) and 200 Area ETF Delisting (40 CFR 261, Appendix IX, Table 2). Construction of the LERF began in 1990. Waste management operations began at LERF in April 1994. Construction of the 200 Area ETF began in 1992. Waste management operations began at 200 Area ETF in November of 1995.

This Chapter provides unit-specific Permit conditions applicable to the dangerous waste management units for LERF and 200 Area ETF.

List of Addenda Specific to Operating Unit Group 3

Addendum A	Part A Form, dated March 31, 2015~~2014~~
Addendum B	Waste Analysis Plan, dated June 30, 2015~~March 31, 2013~~
Addendum C	Process Information, dated December 31, 2014
Addendum D~~Chapter 5.0~~	Groundwater Monitoring ~~(DOE/RL-2013-46, Rev. 0), dated~~ approved April 29, 2014
Addendum E	Security Requirements, dated, June 30, 2011
Addendum F	Preparedness and Prevention, dated April 8, 2014
Addendum G	Personnel Training, dated June 30, 2015~~2012~~
Addendum H	Closure Plan, dated June 30, 2011
Addendum I	Inspection Requirements, dated April 8, 2014
Addendum J	Contingency Plan, dated June 30, 2015~~March 31, 2012~~

Definitions

State and federal delisting actions: The state delisting action pursuant to WAC 173-303-910(3), August 8, 2005, and the federal delisting action appearing in 40 CFR 261, Appendix IX, Table 2 applicable to the United States, Department of Energy, Richland, Washington.

Acronyms

LERF and 200 Area ETF 200-Area Liquids Processing Facility

III.3.A COMPLIANCE WITH UNIT-SPECIFIC PERMIT CONDITIONS

III.3.A.1 The Permittees will comply with all Permit Conditions in this Chapter and its Addendums and Chapters with respect to dangerous waste management and dangerous waste management units in LERF and 200 Area ETF, in addition to requirements in Permit Part I and Part II.

III.3.B GENERAL WASTE MANAGEMENT

III.3.B.1 The Permittees are authorized to accept dangerous and/or mixed waste for treatment in dangerous waste management units that satisfies the waste acceptance criteria in Permit Addendum B according to the waste acceptance procedures in Permit Addendum B. [WAC 173-303-300]

III.3.B.2 The Permittees are authorized to manage dangerous and/or mixed wastes physically present in the dangerous waste management units in LERF and 200 Area ETF as of the effective date of this Permit according to the requirements of Permit Condition III.15.B.1.

III.3.B.3 The Permittees are authorized to treat and/or store dangerous/mixed waste in the dangerous waste management units in LERF and 200 Area ETF according to the following requirements:

III.3.B.3.a The Permittees are authorized to treat, and store as necessary in support of treatment, dangerous waste in the 200 Area ETF tank systems identified in Permit Addendum C, Section C.2, and Section C.4 according to the Permit Conditions of this Chapter.

III.3.B.3.b The Permittees are authorized to store and treat those dangerous and/or mixed waste identified in Permit Addendum C, Section C.3, in containers according to the requirements of this Chapter. All container management activities pursuant to this Permit Condition will take place within the container storage areas or within the 200 Area ETF process area identified in Permit Addendum C, Figures C.3, and C.4.

III.3.B.3.c Treatment in containers authorized by Permit Condition III.3.B.3.b is limited to decanting of free liquids, and addition of sorbents to free liquids. The Permittees will ensure that sorbents are compatible with wastes and the containers. Sorbents will be compliant with the requirements of WAC 173-303-140(4)(b)(iv), incorporated by reference.

III.3.B.3.d The Permittees are authorized to treat aqueous waste in LERF Basins (Basins 42, 43 and 44) subject to the following requirements:

III.3.B.3.d.1 Following treatment in a LERF basin, aqueous wastes must be treated in 200 Area ETF according to Permit Conditions III.3.B.3.a through c.; [40 CFR 268.4(2)(iii), incorporated by reference by WAC 173-303-140]

III.3.B.3.d.2 The Permittees must ensure that for each basin, either supernatant is removed on a flow-through basis, to meet the requirement of 40 CFR 268.4(a)(2)(ii) incorporated by reference by WAC 173-303-140, or incoming waste is shown to not contain solids by either: (1) sampling results showing the waste does not contain detectable solids, or (2) filtering through a 10 micron filter;[WAC 173-303-815(2)(b)(ii)]

III.3.B.4 The Permittees will maintain the physical structure of the LERF and 200 Area ETF as documented in the applicable sections of Permit Addendum C, Section C.2. [WAC 173-303-630(7), WAC 173-303-640(3), WAC 173-303-640(4)]

III.3.B.5 The Permittees are authorized to use treated effluent for recycle/makeup water purposes at the 200 Area ETF as outlined in Permit Addendum C, Section C.2.5.5, and the letters dated August 19, 2005, EPA Region 10 to Keith A. Klein; and August 8, 2005, Department of Ecology to Keith A. Klein. [WAC 173-303-815 (2)(b)(ii)]

III.3.B.6 The Permittees will maintain and operate systems for the 200 Area ETF documented in Permit Addendum C, Section C.2.5 as necessary for proper operation of the 200 Area ETF, compliance with the conditions of this Permit, and protection of human health and the environment. For purposes of this Permit Condition, the Monitor and Control System documented in Permit Addendum C, Section C.2.5.1, is considered to include all indicators, sensors, transducers, actuators and other control devices connected to but remote from the centralized monitor and control system (MCS) computer.

III.3.B.7 The Permittees must complete the following requirements prior to acceptance for treatment in 200 Area ETF aqueous waste streams with listed waste numbers subject to the requirements of the State and Federal delisting: [WAC 173-303-815(2)(b)(ii)]

III.3.B.7.a The Permittees will prepare a written waste processing strategy according to the requirements of the State and Federal Delisting Actions Conditions (1)(a)(ii) and (1)(b), incorporated by reference, and Permit Addendum B, Section B.2.2.2.

III.3.B.7.b The waste processing strategy required by Permit Condition III.3.B.7.a, must document the proposed processing configuration for the 200 Area ETF, operating conditions for each processing unit, and the expected treated effluent characteristics based on the process model and treatability envelope data required by State and Federal Delisting Conditions (1)(a)(ii) and (1)(b).

III.3.B.7.c The written waste processing strategy required by Permit Condition III.3.B.7.a must demonstrate that the projected treated effluent characteristics satisfy the delisting exclusion limits in State and Federal Delisting Condition (5) of the state and federal delisting actions, and the discharge limits of the State Discharge Permit ST-4500.

III.3.B.7.d The Permittees will place a copy of the written waste processing strategy required by Permit Condition III.3.B.7.a in the Hanford Facility Operating Record, LERF and 200 Area ETF file as part of the documentation of waste streams accepted for management at the 200 Area ETF.

III.3.B.8 Treatment of aqueous waste streams in the 200 Area ETF with listed waste numbers that are subject to the requirements of the state and federal delisting actions must comply with the requirements of State and Federal Delisting Condition (1)(c), incorporated by reference. [WAC 173-303-815 (2)(b)(ii)]

III.3.B.9 The Permittees will manage treated effluent in the final verification tanks according to the requirements of the State and Federal Delisting Conditions (3) and (5), incorporated by reference. [WAC 173-303-815 (2)(b)(ii)]

III.3.B.10 The Permittees will manage treated effluent from the 200 Area ETF according to the requirements of the State Waste Discharge Permit ST 4500 and State and Federal Delisting Condition (7). [WAC 173-303-815(2)(b)(ii)]

III.3.B.11 The Permittees will ensure compliance with treatment standards (40 CFR 268, incorporated by reference by WAC 173-303-140) applicable to treated effluent prior to discharge to the State Authorized Land Disposal Site (SALDS), the delisting criteria at 40 CFR 261, Appendix IX, Table 2, and the corresponding state-approved delisting (dated August 8, 2005, all incorporated by reference). Sampling and analysis necessary for these demonstrations must meet the corresponding requirements in Permit Addendum B. [WAC 173-303-140, WAC 173-303-815 (2)(b)(ii)]

III.3.C WASTE ANALYSIS

III.3.C.1 The Permittees will comply with requirements in Permit Addendum B for sampling and analysis of all dangerous and/or mixed waste required by conditions in this Chapter. [WAC 173-303-300]

III.3.C.2 The Permittees will have an accurate and complete waste profile as described in Permit Addendum B, Section B.2.1.2, for every waste stream accepted for management in LERF and 200 Area ETF dangerous waste management units. [WAC 173-303-380 (1)(a), (b)]

III.3.C.3 The Permittees will place a copy of each waste profile required by Permit Condition III.15.C.2 in the Hanford Facility Operating Record, LERF and 200 Area ETF file required by Permit Condition II.I.1.j~~II.I.2~~. [WAC 173-303-380 (1)(a), (b)]

III.3.C.4 The Permittees will make a copy of the waste profile required by Permit Condition III.15.C.2 available upon request. [WAC 173-303-380 (1)(a), (b)]

III.3.C.5 Records and results of waste analysis described in this Permit will be maintained in the Hanford Facility Operating Record, LERF and 200 Area ETF file required by Permit Condition II.I.1.b~~II.I.2~~. [WAC 173-303-380 (1)(a), (b)]

III.3.D RECORDKEEPING AND REPORTING

III.3.D.1 The Permittees will place the following into the Hanford Facility Operating Record, LERF and 200 Area ETF file required by Permit Condition II.I.1~~II.I.2~~:

III.3.D.1.a Records required by WAC 173-303-380 (1)(k), and -(o) incorporated by reference.

III.3.D.1.b Records and results of waste analysis, waste determinations (as required by Subpart CC) and trial tests required by WAC 173-303-300, General waste analysis, and by 40 CFR §264.1034,§264.1063, §264.1083, §265.1034, §265.1063, §265.1084, §268.4(a), and §268.7; [WAC 173-303-310(2)]

III.3.D.1.c An inspection log, summarizing inspections conducted pursuant to Permit Condition III.3.H.1; [WAC 173-303-380(1)(e)]

III.3.D.1.d Records required by the State and Federal Delisting Condition (6), incorporated by reference; [WAC 173-303-815 (2)(b)(ii)]

III.3.E SECURITY

III.3.E.1 The Permittees comply with the Security requirements specific to the LERF and 200 Area ETF in Addendum E and Permit Attachment 3 as required by Permit Condition II.M. [WAC 173-303-310(2)]

III.3.F PREPAREDNESS AND PREVENTION

III.3.F.1 The Permittees will comply with the Preparedness and Prevention requirements specific to LERF and 200 Area ETF in Addendum F. [WAC 173-303-340]

III.3.G CONTINGENCY PLAN

III.3.G.1 The Permittees will comply with Addendum J, Contingency Plan, in addition to the requirements of Permit Condition II.A when applicable. [WAC 173-303-350]

III.3.H INSPECTIONS

III.3.H.1 The Permittees will comply with Addendum I in addition to the requirements of Permit Condition II.X. [WAC 173-303-320]

III.3.I TRAINING PLAN

III.3.I.1 The Permittees will include the training requirements described in Addendum G of this Chapter specific to the dangerous waste management units and waste management activities at LERF and 200 Area ETF into the written training plan required by Permit Condition II.C.

III.3.J GENERAL REQUIREMENTS

III.3.J.1 The Permittees will comply with the requirements of WAC 173-303-395(1), incorporated by reference, for prevention of reaction of ignitable, reactive, or incompatible wastes.

III.3.K CLOSURE

III.3.K.1 The Permittees will close dangerous waste management units in the LERF and 200 Area ETF in accordance with Addendum H, Closure Plan, and Permit Condition II.J. [WAC 173-303-610(3)(a)]

III.3.L POST CLOSURE – RESERVED

III.3.M CRITICAL SYSTEMS – RESERVED

III.3.N RESERVED

III.3.O CONTAINERS

III.3.O.1 Container Storage and Treatment Unit Standards

III.3.O.1.a As part of or in addition to the requirements of Permit Condition III.3.B.2, the Permittees will ensure the integrity of container storage secondary containment and the chemically resistant coating described in Addendum C, Section C.3.4.1 as necessary to ensure any spills or releases to secondary containment do not migrate to the underlying concrete or soils.

III.3.O.1.a.1 Include documentation of any damage and subsequent repairs in the Hanford Facility Operating Record, LERF and 200 Area ETF file required by Permit Condition II.I.1~~II.I.2~~.

III.3.O.2 Container Management Standards

III.3.O.2.a The Permittees will maintain and manage wastes in accordance with the requirements of Addendum C, Section 4.3.2, and Section 4.3.2. [WAC 173-303-630(2)]

III.3.O.2.b The Permittees will label containers in accordance with the requirements of Addendum C, Section C.3.2, and Section C.3.3. [WAC 173-303-630(3)]

III.3.O.2.c The Permittees will comply with the requirements for managing wastes in containers in WAC 173-303-630(5), incorporated by reference.

III.3.O.2.d The Permittees will ensure wastes are compatible with containers and with other wastes stored or treated in containers within the 200 Area ETF according to the requirements of Addendum C, Section C.3.4.3. [WAC 173-303-630(4), WAC 173-303-630(9)]

III.3.O.2.e The Permittees may treat wastes in containers via decanting of free liquids and addition of sorbents. The Permittees may not use addition of sorbents for purposes of changing the treatability group of a waste with respect to the land disposal restriction standards of 40 CFR 268, incorporated by reference by WAC 173-303-140.

III.3.O.2.f The Permittees will remove any accumulated liquids from container storage areas in 200 Area ETF according to the requirements of Addendum C, Section C.3.4.2, to ensure containers are not in contact with free liquids and to prevent overflow of the container storage area secondary containment.

III.3.O.2.g The Permittees will comply with the requirements for air emissions from containers in Addendum C, Section C.6.3.2. [WAC 173-303-692]

III.3.P TANK SYSTEMS

III.3.P.1 Tank System Requirements

III.3.P.1.a The Permittees will develop a schedule for conducting integrity assessments (IA). The schedule will meet the requirements of Addendum C, Section C.4.2, and consideration of the factors in WAC 173-303-640(2)(e) or WAC 173-303-640(3)(b) as applicable:

III.3.P.1.b The Permittees will maintain a copy of the schedule required by Permit Condition III.3.P.1.a, in the Hanford Facility Operating Record, LERF and 200 Area ETF file, and conduct periodic integrity assessments according to the schedule. The Permittees will document results of integrity assessments conducted according to the IA in the Hanford Facility Operating Record, LERF and 200 Area ETF file.

III.3.P.1.c For existing tank systems, if a tank system is found to be leaking, or is unfit for use, the Permittees must follow the requirements of WAC 173-303-640(7), incorporated by reference. [WAC 173-303-640(3)(b)]

III.3.P.2 Tank System Operating Requirements

III.3.P.2.a The Permittees will comply with the requirements of WAC 173-303-640(5)(a), incorporated by reference.

III.3.P.2.b The Permittees will comply with the requirements of Addendum C, Section C.4.5.2. [WAC 173-303-640(5)(b)]

III.3.P.2.c The Permittees will comply with the requirements of Addendum C, Section C.4.6. [WAC 173-303-640(5)(d)]

III.3.P.2.d The Permittees will comply with the requirements of WAC 173-303-640(7), incorporated by reference, in response to spills or leaks from tanks systems at 200 Area ETF. [WAC 173-303-640(5)(c)]

III.3.P.2.e The Permittees will ensure that the Waste Processing Strategy required by Permit Condition III.3.B.7.a, provides for the immediate treatment or blending of waste accepted for management at the 200 Area ETF such that the resulting waste or mixture is no longer reactive or ignitable when further managed in 200 Area ETF tank systems. [WAC 173-303-640(9)]

III.3.P.2.f The Permittees will comply with the requirements of WAC 173-303-640(10), incorporated by reference.

III.3.Q SURFACE IMPOUNDMENTS

III.3.Q.1 The Permittees will maintain the three LERF basins according to the requirements of WAC 173-303-650 (2)(f), incorporated by reference.

III.3.Q.2 The Permittees will operate the LERF basins according to the requirements of Addendum C, Section C.5.3, and Addendum I, Section I.2.2.3.1 to prevent over-topping. [WAC 173-303-650 (2)(c)]

III.3.Q.3 The Permittees will develop and maintain, and operate the LERF basins to ensure that any flow of waste into the impoundment can be immediately shut off in the event of overtopping or liner failure. [WAC 173-303-650 (2)(d)]

III.3.Q.4 The Permittees will comply with the requirements of WAC 173-303-650 (2)(g), incorporated by reference.

III.3.Q.5 The Permittees will comply with the requirements of WAC 173-303-650 (4)(b), incorporated by reference.

III.3.Q.6 The Permittees will comply with the requirements of WAC 173-303-650 (4)(c), incorporated by reference. The certification required by this Permit Condition must be provided to Ecology no later than seven calendar days after the date of the certification. A copy of the certification will be placed in the Hanford Facility Operating Record, LERF and 200 Area ETF file required by Permit Condition II.I.1~~II.I.2~~. [WAC 173-303-650 (4)(c)]

III.3.Q.7 The Permittees will comply with the requirements of WAC 173-303-650(5)(b), incorporated by reference, in response to events in WAC 173-303-650(5)(a), incorporated by reference.

III.3.Q.8 The Permittees will comply with the requirements of WAC 173-303-650(5)(d) for any LERF basin that has been removed from service in accordance with Permit Condition III.3.Q.7 that the Permittees will restore to service. [WAC 173-303-650(5)(d)]

Hanford Facility RCRA Permit Change Notice

Unit:	Permit Part
Liquid Effluent Retention Facility & 200 Area Effluent Treatment Facility	**Part III, Operating Unit Group 3**

Description of Modification:

Addendum B, Waste Analysis Plan

- Corrected page numbering throughout document to be consistent with the rest of the Permit, and regenerated the Table of Contents.
- Section B.2.1, Waste Information: modified reference to Permit Condition II.I.2 (Facility Operating Record), because that Permit Condition no longer exists in Revision 8C, dated April 28, 2014. The modified reference refers to Permit Condition II.I.1.j for Facility Operating Record requirements.
- Changed the CH2M Hill Plateau Remediation Contractor (CHPRC) job title/position "Environmental Compliance Officer (ECO)" to the equivalent Washington River Protection Solutions (WRPS) "Environmental Field Representative" job title/position.

WAC 173-303-830 Modification Class [1,2]	Class 1	Class [1]1	Class 2	Class 3
Please mark the Modification Class:	X			

Enter relevant WAC 173-303-830, Appendix I Modification citation number: B.5.b

Enter wording of WAC 173-303-830, Appendix I Modification citation: General Facility Standards, Changes in the Training plan, other changes.

Modification Approved: ☑ Yes ☐ No (state reason for denial)	Reviewed by Ecology:
Reason for denial:	S. L. Dahl-Crumpler — Date: 6-15-15

Addendum B Waste Analysis Plan

Figures

Tables

B WASTE ANALYSIS PLAN

Metric Conversion Chart

Into metric units			Out of metric units		
If you know	Multiply by	To get	If you know	Multiply by	To get
Length			Length		
inches	25.40	millimeters	millimeters	0.0393	inches
inches	2.54	centimeters	centimeters	0.393	inches
feet	0.3048	meters	meters	3.2808	feet
yards	0.914	meters	meters	1.09	yards
miles	1.609	kilometers	kilometers	0.62	miles
Area			Area		
square inches	6.4516	square centimeters	square centimeters	0.155	square inches
square feet	0.092	square meters	square meters	10.7639	square feet
square yards	0.836	square meters	square meters	1.20	square yards
square miles	2.59	square kilometers	square kilometers	0.39	square miles
acres	0.404	hectares	hectares	2.471	acres
Mass (weight)			Mass (weight)		
ounces	28.35	grams	grams	0.0352	ounces
pounds	0.453	kilograms	kilograms	2.2046	pounds
short ton	0.907	metric ton	metric ton	1.10	short ton
Volume			Volume		
fluid ounces	29.57	milliliters	milliliters	0.03	fluid ounces
quarts	0.95	liters	liters	1.057	quarts
gallons	3.79	liters	liters	0.26	gallons
cubic feet	0.03	cubic meters	cubic meters	35.3147	cubic feet
cubic yards	0.76456	cubic meters	cubic meters	1.308	cubic yards
Temperature			Temperature		
Fahrenheit	subtract 32 then multiply by 5/9ths	Celsius	Celsius	multiply by 9/5ths, then add 32	Fahrenheit
Force			Force		
pounds per square inch	6.895	kilopascals	kilopascals	1.4504×10^{-4}	pounds per square inch

Source: *Engineering Unit Conversions*, M. R. Lindeburg, P.E., Second Ed., 1990, Professional Publications, Inc., Belmont, California.

B.1 INTRODUCTION

In accordance with the regulations set forth in the Washington State Department of Ecology (Ecology) *Dangerous Waste Regulations*, Washington Administrative Code (WAC) 173-303-300, this waste analysis plan (WAP) has been prepared for operation of the Liquid Effluent Retention Facility (LERF) and the 200 Area Effluent Treatment Facility (200 Area ETF) located in the 200 East Area on the Hanford Site, Richland, Washington.

The purpose of this WAP is to ensure that adequate knowledge as defined in WAC 173-303-040, is obtained for dangerous and/or mixed waste accepted by and managed in LERF and 200 Area ETF. This WAP documents the sampling and analytical methods, and describes the procedures used to obtain this knowledge. This WAP also documents the requirements for generators sending aqueous waste to the LERF or 200 Area ETF for treatment. Throughout this WAP, the term generator includes any Hanford Site source, including treatment, storage, and disposal (TSD) units, whose process produces an aqueous waste.

LERF consists of three surface impoundments which provide treatment and storage. The 200 Area ETF includes a tank system, which provides treatment and storage, and a container management area, which provides container storage and treatment. Additionally, this WAP discusses the sampling and analytical methods for the treated effluent (treated aqueous waste) that is discharged from 200 Area ETF as a non-dangerous, delisted waste to the State Approved Land Disposal Site (SALDS). Specifically, the WAP contains sampling and analysis requirements including quality assurance/quality control requirements, for the following:

- Influent Waste Acceptance Process - determines the acceptability of a particular aqueous waste at the LERF or 200 Area ETF pursuant to applicable Permit conditions, regulatory requirements, and operating capabilities prior to acceptance of the waste at the LERF or 200 Area ETF for treatment or storage. This includes documenting that wastes accepted for treatment at ETF are within the treatability envelope required by the Final Delisting 200 Area ETF, Permit Condition 1.a.i. Refer to Section B.2.
- Special Management Requirements - identifies the special management requirements for aqueous wastes managed in the LERF or 200 Area ETF. Refer to Section B.3.
- Influent Aqueous Waste Sampling and Analysis - describes influent sampling and analyses used to characterize an influent aqueous waste to ensure proper management of the waste and for compliance with the special management requirements. Also includes rationale for analyses. Refer to Section B.4.
- Treated Effluent Sampling and Analysis - describes sampling and analyses of treated effluent (i.e., treated aqueous waste) for compliance with Washington State Waste Discharge Permit, No. ST 4500 (Ecology 2000); and Final Delisting 200 Area ETF [40 CFR 261, Appendix IX, Table 2 and the corresponding State Final Delisting issued pursuant to WAC 173-303-910(3) limits. Also includes rationale for analyses. Refer to Section B.5.
- 200 Area ETF Generated Waste Sampling and Analysis - describes the sampling and analyses used to characterize the secondary waste streams generated from the treatment process and to characterize waste generated from maintenance and operations activities. Also includes rationale for analyses. Characterization and designation of wastes generated from maintenance and operations activities are conducted pursuant to WAC 173-303-170 and are not subject to the permit requirements of WAC 173-303-800. These descriptions are included in this WAP for purposes of completeness, but are not enforceable conditions of this WAP or the permit. Refer to Section B.6.
- Quality Assurance and Quality Control - ensures the accuracy and precision of sampling and analysis activities. Refer to Section B.7.

This WAP meets the specific requirements of the following:

- Land Disposal Restrictions Treatment Exemption for the LERF under 40 CFR 268.4, U.S. Environmental Protection Agency (EPA), December 6, 1994 (EPA 1994)
- Final Delisting 200 Area ETF [40 CFR 261, Appendix IX, Table 2
- Corresponding State Final Delisting issued pursuant to WAC 173-303-910(3)
- Washington State Waste Discharge Permit (No. ST 4500), as amended
- Hanford Facility Dangerous Waste Permit (Permit) WA7890008967, as amended.

The Permit conditions of the Washington State Waste Discharge Permit (No. ST 4500) are included in this WAP for completeness, as well as generator requirements for designation of wastes generated by LERF and 200 Area ETF from operation and maintenance activities. The Washington State Waste Discharge Permit (No. ST 4500) Conditions are not within the scope of RCRA or WAC 173-303 or subject to the permit requirements of WAC 173-303-800. Therefore, revisions of this WAP that are not governed by the requirements of WAC 173-303 will not be considered as a modification subject to review or approval by Ecology. Any other revisions to this WAP will be incorporated through the Permit modification process as necessary to demonstrate compliance with requirements of this Permit, including Permit Conditions I.E.7 and I.E.8.

B.1.1 Liquid Effluent Retention Facility and Effluent Treatment Facility Description

The LERF and 200 Area ETF comprise an aqueous waste treatment system located in the 200 East Area. Both LERF and 200 Area ETF may receive aqueous waste through several inlets. 200 Area ETF can receive aqueous waste through three inlets. First, 200 Area ETF can receive aqueous waste directly from the LERF. Second, aqueous waste can be transferred from the Load-in Station to 200 Area ETF. Third, aqueous waste can be transferred from containers (e.g., carboys, drums) to the 200 Area ETF through either the Secondary Waste Receiving Tanks or the Concentrate Tanks. The Load-in Station is located just east of 200 Area ETF and currently consists of three storage tanks and a pipeline that connects to either LERF or 200 Area ETF through fiberglass pipelines with secondary containment.

The LERF can receive aqueous waste through four inlets. First, aqueous waste can be transferred to LERF through a dedicated pipeline from the 200 West Area. Second, aqueous waste can be transferred through a pipeline that connects LERF with the 242-A Evaporator. Third, aqueous waste also can be transferred to LERF from a pipeline that connects LERF to the Load-in Station at 200 Area ETF. Finally, aqueous waste can be transferred into LERF through a series of sample ports located at each basin.

The LERF consists of three lined surface impoundments with a nominal capacity of 29.5 million liters each. Aqueous waste from LERF is pumped to 200 Area ETF through a double walled fiberglass pipeline. The pipeline is equipped with leak detection located in the annulus between the inner and outer pipes. Each basin is equipped with six available sample risers constructed of 6-inch-perforated pipe. A seventh sample riser in each basin is dedicated to influent waste receipt piping, and an eighth riser in each basin contains liquid level instrumentation. Each riser extends along the sides of each basin from the top to the bottom of the basin. Detailed information on the construction and operation of the LERF is provided in Addendum C, Process Information.

200 Area ETF is designed to treat the contaminants anticipated in process condensate from the 242-A Evaporator and other aqueous wastes from the Hanford Site. Section B.1.2 provides more information on the sources of these wastes.

The capabilities of 200 Area ETF were confirmed through pilot plant testing. A pilot plant was used to test surrogate solutions that contained constituents of concern anticipated in aqueous wastes on the Hanford Site. The pilot plant testing served as the basis for a demonstration of the treatment capabilities of 200 Area ETF in the *200 Area Effluent Treatment Facility Delisting Petition* (DOE/RL-92-72).

200 Area ETF consists of a primary and a secondary treatment train (Figure B.1). The primary treatment train removes or destroys dangerous and mixed waste components from the aqueous waste. In the secondary treatment train, the waste components are concentrated and dried into a powder. This waste is containerized, and transferred to a waste treatment, storage, and/or disposal (TSD) unit.

Each treatment train consists of a series of operations. The primary treatment train includes the following:

- surge tank
- Filtration
- Ultraviolet light oxidation (UV/OX)
- pH adjustment
- Hydrogen peroxide decomposition
- Degasification
- Reverse osmosis (RO)
- Ion exchange
- Final pH adjustment and verification

The secondary treatment train uses the following:

- Secondary waste receiving
- Evaporation (with mechanical vapor recompression)
- Concentrate staging
- Thin film drying
- Container handling
- Supporting systems

A dry powder waste is generated from the secondary treatment train, from the treatment of an aqueous waste. The secondary waste treatment system typically receives and processes by-products generated from the primary treatment train. However, in an alternate operating scenario, some aqueous wastes may be fed to the secondary treatment train before the primary treatment train.

The treated effluent is contained in verification tanks where the effluent is sampled to confirm that the effluent meets the delisting criteria. Under 40 CFR 261, Appendix IX, Table 2, the treated effluent from 200 Area ETF is considered a delisted waste; that is, the treated effluent is no longer a listed dangerous waste subject to the hazardous waste management requirements of RCRA provided that the delisting criteria are satisfied and the treated effluent does not exhibit a dangerous characteristic. The treated effluent is discharged under the Washington State Waste Discharge Permit (No. ST 4500) as a nondangerous, delisted waste to the SALDS, located in the 600 Area, north of the 200 West Area. A portion of the treated wastewater from the Verification Tanks is recycled as service water throughout the facility; for example, it is used to dilute bulk acid and caustic to meet processing needs, thereby reducing the demand for process water.

B.1.2 Sources of Aqueous Waste

200 Area ETF was intended and designed to treat a variety of mixed wastes. However, process condensate from the 242-A Evaporator was the only mixed waste initially identified for storage and treatment in the LERF and 200 Area ETF. As cleanup activities at Hanford progress, many of the aqueous wastes generated from site remediation and waste management activities are sent to the LERF and 200 Area ETF for treatment and storage. A brief discussion of waste streams that may be managed by LERF and 200 Area ETF in the future may be found in the 200 Area ETF Delisting Petition (DOE/RL-92-97). Prior to management of any new waste streams, it may be necessary to modify this WAP through the permit modification process to ensure that adequate knowledge of such new waste streams is available prior to management of them in LERF and 200 Area ETF.

The 242-A process condensate is a dangerous waste because it is derived from a listed, dangerous waste stored in the Double-Shell Tank (DST) System. The DST waste is transferred to the 242-A Evaporator where the waste is concentrated through an evaporation process. The concentrated slurry waste is returned to the DST System, and the evaporated portion of the waste is recondensed, collected, and transferred as process condensate to the LERF.

Other aqueous wastes that are treated and stored at the LERF and 200 Area ETF include, but are not limited to the following Hanford wastes:

- Contaminated groundwater from pump-and-treat remediation activities such as groundwater from the 200-UP-1 Operable Unit;
- Purgewater from groundwater monitoring activities;
- Water from deactivation activities, such as water from the spent fuel storage basins at deactivated reactors (e.g., N Reactor);
- Laboratory aqueous waste from unused samples and sample analyses;
- Leachate from landfills, such as the Environmental Restoration Disposal Facility;
- Any dilute waste, which may be accepted for treatment and within the scope of wastewaters that maybe delisted under terms of the revised delisting (40 CFR 261, Appendix IX, Table 2).

Most of these aqueous wastes are accumulated in batches in a LERF basin for interim storage and treatment through pH and flow equalization before final treatment in 200 Area ETF. However, some aqueous wastes, such as 200-UP-1 Groundwater, maybe treated on a flow through basis in LERF en route to 200 Area ETF for final treatment. The constituents in these aqueous wastes are common to the Hanford Site and were considered in pilot plant testing or in vendor tests, either as a constituent or as a family of constituents. According to the 200 Area ETF Delisting, Permit Condition 1.a.i, all wastes accepted for treatment at 200 Area ETF must be within a specified treatability envelope that ensures that wastes will be within the treatment capability of 200 Area ETF.

B.2 INFLUENT WASTE ACCEPTANCE PROCESS

Throughout the acceptance process, there are specific criteria required for an influent waste (i.e., aqueous waste) to be accepted at the LERF and/or 200 Area ETF. These criteria are identified in the following sections and summarized in Table B.2. The process of accepting a waste into the LERF and 200 Area ETF systems involves a series of steps, as follows.

- Waste information: The generator of an aqueous waste works with LERF and 200 Area ETF personnel to provide characterization data of the waste stream (Section B.2.1).
- Waste management decision process: LERF and 200 Area ETF management decision is based on a case-by-case evaluation of whether an aqueous waste stream is acceptable for treatment or storage at LERF and the 200 Area ETF. The evaluation has two categories:
  - Regulatory acceptability: a review to determine if there are any, regulatory concerns that would prohibit the storage or treatment of an aqueous waste in the LERF or 200 Area ETF; e.g., treatment would meet permit conditions that would comply with applicable regulations.
  - Operational acceptability: an evaluation to determine if there are any operational concerns that would prohibit the storage or treatment of an aqueous waste in the LERF or 200 Area ETF and storage of treatment residuals; e.g., determine treatability and compatibility or safety considerations (Section B.2.2.2).

B.2.1 Waste Information

When an aqueous waste stream is identified for treatment or storage in the LERF or 200 Area ETF, the generator is required to characterize the waste stream according to the requirements in Section B.2.1.1 and document the results of characterization on an aqueous waste profile sheet. This requirement is the first waste acceptance criterion. The LERF and 200 Area ETF personnel work with the generators to ensure that the necessary information is collected for the characterization of a waste stream (i.e., the appropriate analyses or adequate knowledge), and that the information provided on the waste profile sheet is complete. The completed waste profile sheet is maintained in the Hanford Facility Operating Record, LERF and 200 Area ETF File according to Permit Condition II.I.1.j~~II.I.2~~.

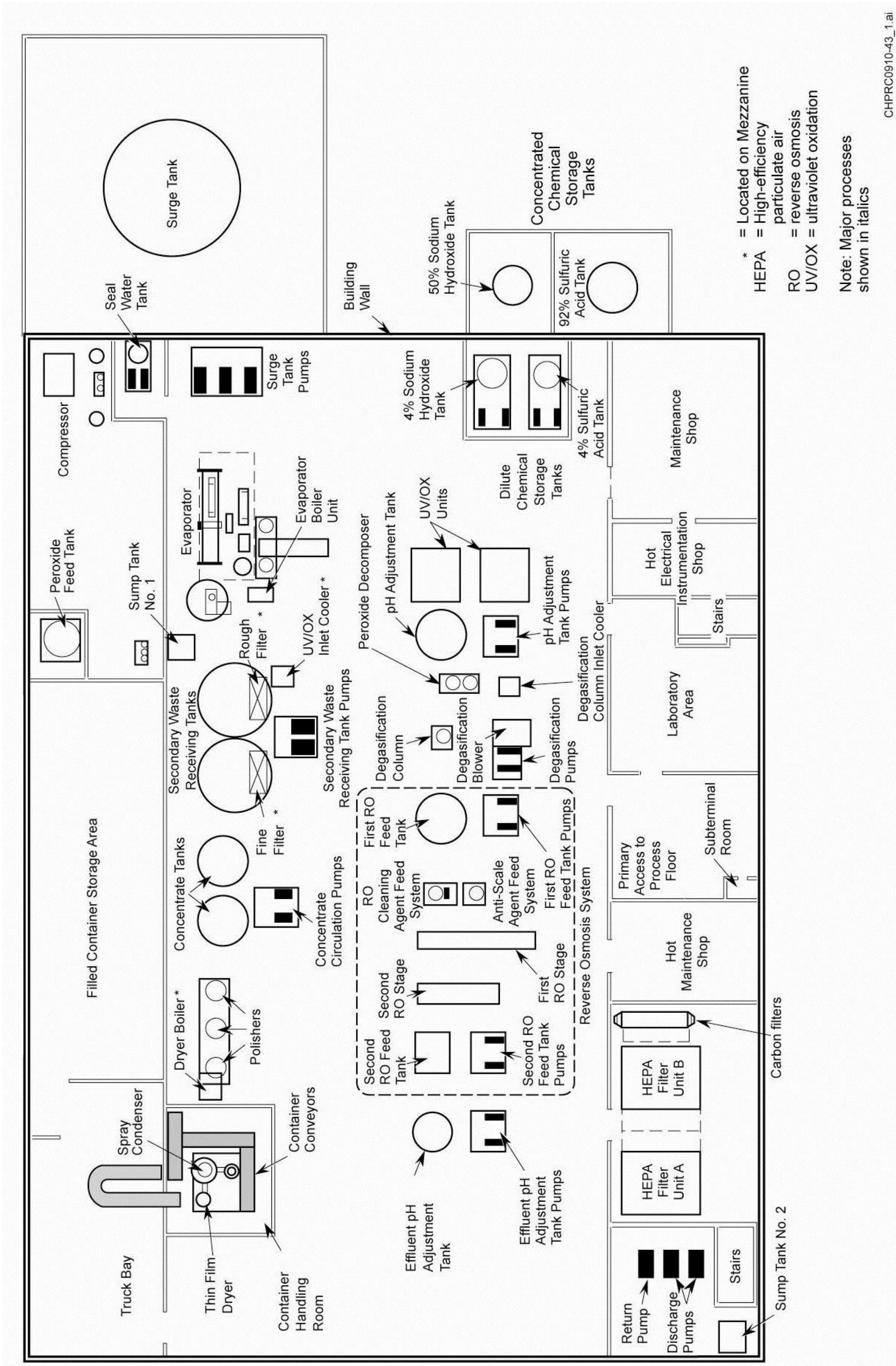
B.2.1.1 Waste Characterization

Because the constituents in the individual aqueous waste streams vary, each waste stream is characterized and evaluated for acceptability on a case-by-case basis. The generator is required to designate an aqueous waste, which generally will be based on analytical data. However, a generator may use knowledge to substantiate the waste designation, or for general characterization information. Examples of acceptable knowledge include the following:

- Documented data or information on processes similar to that which generated the aqueous waste stream
- Information/documentation that the waste stream is from specific, well documented processes, e.g., F-listed wastes
- Information/documentation that sampling/analyzing a waste stream would pose health and safety risks to personnel
- Information/documentation that the waste stream does not lend itself to collecting a laboratory sample for example, wastewater collected (e.g., sump, tank) where the source water characterization is documented. Typically, these circumstances occur at decommissioned buildings or locations, not at operating units.

When a generator performs characterization of a dangerous and/or mixed waste stream based on knowledge, LERF and 200 Area ETF personnel review the knowledge as part of the waste acceptance process to ensure the knowledge satisfies the definition of *knowledge* in WAC 173-303-040. Specifically, LERF and 200 Area ETF personnel review the generator's processes to verify the integrity of the knowledge, and determine whether the knowledge is current and consistent with requirements of this is WAP. LERF and 200 Area ETF management or their designee determines the final decision on the adequacy of the knowledge. The persons reviewing generator process knowledge and those making decisions on the adequacy of knowledge are trained according to the requirements of Addendum G, Personnel Training.

Figure B.1. 200 Area Effluent Treatment Facility Floor Plan



The generator is also responsible for identifying Land Disposal Restrictions (LDRs) treatment standards applicable to the influent aqueous waste as part of the characterization, as required under 40 CFR 268.40 incorporated by reference by WAC 173-303-140. Because the 200 Area ETF main treatment train is a Clean Water Act, equivalent treatment unit [40 CFR 268.37(a)] incorporated by reference by WAC 173-303-140, generators are not required to identify underlying hazardous constituents for characteristic wastes pursuant to 40 CFR 268.9, incorporated by reference by WAC 173-303-140, for wastewaters (i.e., <1 percent total suspended solids and <1 percent total organic carbon). The 200 Area ETF secondary waste (e.g., powder) reflects a change in LDR treatability group (i.e., wastewater to non-wastewater) so there is a new LDR point of generation, at which point any characteristic and associated underlying hazardous constituents must be identified. Therefore, generators of a non-wastewater may be required to identify underlying hazardous constituents for characteristic wastes pursuant to 40 CFR 268.9, incorporated by reference by WAC 173-303-140.

When analyzing an aqueous waste stream for LERF and 200 Area ETF waste acceptance characterization, a generator is required to use the target list of parameters identified in Table B.3, of this WAP. This requirement is in addition to any analysis required for purposes of designation under WAC 173-303-070. These data are used by LERF and 200 Area ETF to verify the treatability of an aqueous waste stream, and to develop a treatment plan for the waste after acceptance. Refer to Table B.6, for the corresponding analytical methods. The generator may use knowledge in lieu of some analyses, as determined by LERF and 200 Area ETF management or their designee, if the knowledge satisfies the definition of *knowledge* in WAC 173-303-040.). For example if a generator provides information that the process generating an aqueous waste does not include or involve organic chemicals, analyses for organic compounds likely would not be required. Additional analyses could be required if historical information and/or knowledge indicate that an aqueous waste contains constituents not included in the target list of parameters.

The characterization and historical information are documented in the waste profile sheet, which is discussed in the following section and is part of the Hanford Facility Operating Record, LERF and 200 Area ETF File according to Permit Condition II.I.

B.2.1.2 Aqueous Waste Profile Sheet

The waste profile sheet documents the characterization of each new aqueous waste stream. The profile includes a detailed description of the source, volume, waste designation and applicable LDR treatment standards, and physical nature (wastewater or non-wastewater) of the aqueous waste. For an aqueous waste to be accepted for treatment or storage in the LERF or 200 Area ETF, each new waste stream generator is required to complete and provide this form to LERF and 200 Area ETF management. Each generator also is required to provide the analytical data and/or knowledge used to designate the aqueous waste stream according to WAC 173-303-070 and to determine the chemical and physical nature of the waste.

The LERF and ETF management determine whether the information on the waste profile sheet is sufficient according to the criteria above. The LERF and 200 Area ETF management use this information to evaluate the acceptability of the aqueous waste stream for storage and treatment in the LERF and 200 Area ETF, and to determine if the secondary waste generated from treatment is acceptable for storage at the 200 Area ETF and has a defined path forward to final disposal.

B.2.2 Waste Management Decision Process

All aqueous waste under consideration for acceptance must be characterized using analytical data and/or knowledge. This information is used to determine the acceptability of an aqueous waste stream. The LERF and 200 Area ETF Facility Manager or their designee is responsible for making the decision to accept or reject an aqueous waste stream. The management decision to accept any aqueous waste stream is based on an evaluation of regulatory acceptability and operational acceptability. Each evaluation uses acceptance criteria, which were developed to ensure that an aqueous waste is managed in a safe, environmentally sound, and in compliance with this Permit. The following sections provide detail on the acceptance evaluation and the acceptance criteria.

An aqueous waste stream could be rejected for one of the following reasons:

- The paperwork and/or laboratory analyses from the generator are insufficient
- Discrepancies with the regulatory and operational acceptance criteria cannot be reconciled, including:
  - An aqueous waste is not allowed under the current Washington State Waste Discharge Permit (No. ST 4500) or 200 Area ETF Delisting, and LERF and 200 Area ETF management elect not to pursue an amendment, or the Permit and Delisting cannot be amended (Section B.2.2.1)
  - An aqueous waste is incompatible with LERF liner materials or with other aqueous waste in LERF and no other management method is available (Section B.2.2.2.2).
- Adequate storage or treatment capacity is not available.

B.2.2.1 Regulatory Acceptability

Each aqueous waste stream is evaluated on a case-by-case basis to determine if there are any regulatory concerns that would preclude the storage or treatment of a waste in the LERF or 200 Area ETF based on the criteria in Sections B2.2.1.1 and B.2.2.1.2. Before an aqueous waste can be stored or treated in either the LERF or 200 Area ETF, the waste designation must be determined. Information on the waste designation of an aqueous waste is documented in the waste profile sheet. This information is used to confirm that treating or storing the aqueous waste in the LERF or 200 Area ETF is allowed under and in compliance with WAC 173-303, Permit (WA7890008967), 200 Area ETF Delisting in 40 CFR 261, Appendix IX, Table 2, the corresponding State-Issued Delisting, and the Washington State Waste Discharge Permit (No. ST 4500) for 200 Area ETF.

B.2.2.1.1 Dangerous Waste Regulations, State and Federal Delisting Actions, and Permits

Before an aqueous waste stream is sent to the LERF or 200 Area ETF, the generator will characterize and designate the stream with the appropriate dangerous/hazardous waste numbers according to WAC 173-303-070. Addendum A, the 200 Area ETF Delisting and the corresponding State-Issued Delisting identify the specific waste numbers for dangerous/mixed waste that can be managed in the LERF and 200 Area ETF. Dangerous waste designated with waste numbers not specified in these documents cannot be treated or stored in the LERF or 200 Area ETF, unless the documents are appropriately modified.

Additionally, aqueous wastes designated with listed waste numbers identified in the 200 Area ETF Delisting and the corresponding State-Issued Delisting will be managed in accordance with the conditions of the delisting, or an amended delisting.

B.2.2.1.2 State Waste Permit Regulations/Permit

Compliance with the Washington State Waste Discharge Permit (No. ST 4500), constitutes another waste acceptance criterion. In accordance with the permit conditions of the Washington State Waste Discharge Permit (No. ST 4500), the constituents of concern in each new aqueous waste stream must be identified. The waste designation and characterization data provided by the generator are used to identify these constituents. The Washington State Waste Discharge Permit (No. ST 4500), defines a constituent of concern in an aqueous waste stream, under the conditions of the Discharge Permit, as any contaminant with a maximum concentration greater than one of the following:

- Any limit in the Washington State Waste Discharge Permit (No. ST 4500)
- Groundwater Quality Criteria (WAC 173-200)
- Final Delisting level (40 CFR 261, Appendix IX, Table 2)
- The corresponding State-Issued Delisting

- Background groundwater concentration as measured at the SALDS disposal site. The practical quantification limit (PQL) is used for the groundwater background concentration for constituents not analyzed or not detected in the SALDs background data.

The Permit conditions of the Washington State Waste Discharge Permit (No. ST 4500), also require a demonstration that 200 Area ETF can treat the constituents of concern to below discharge limits.

B.2.2.2 Operational Acceptability

Because the operating configuration or operating parameters at the LERF and 200 Area ETF can be adjusted or modified, most aqueous waste streams generated on the Hanford Site can be effectively treated to below Delisting and Discharge Permit limits. Because of this flexibility, it would be impractical to define numerical acceptance or decision limits. Such limits would constrain the acceptance of appropriate aqueous waste streams for treatment at the LERF and 200 Area ETF. The versatility of the LERF and 200 Area ETF is better explained in the following examples:

- The typical operating configuration of 200 Area ETF is to process an aqueous waste through the UV/OX unit first, followed by the RO unit. However, high concentrations of nitrates may interfere with the performance of the UV/OX. In this case, 200 Area ETF could be configured to process the waste in the RO unit prior to the UV/OX unit.
- For a small volume aqueous waste with high concentrations of some anions and metals, the approach may be to first process the waste stream in the secondary treatment train. This approach would prevent premature fouling or scaling of the RO unit. The liquid portion (i.e., untreated overheads from 200 Area ETF evaporator and thin film dryer) would be sent to the primary treatment train.
- An aqueous waste with high concentrations of chlorides and fluorides may cause corrosion problems when concentrated in the secondary treatment train. One approach is to adjust the corrosion control measures in the secondary treatment train. An alternative may be to blend this aqueous waste in a LERF basin with another aqueous waste, which has sufficient dissolved solids, such that the concentration of the chlorides in the secondary treatment train would not pose a corrosion concern.
- Some metal salts (e.g., barium sulfate) tend to scale the RO membranes. In this situation, descalants used in the treatment process may be increased.
- Any effluent that does not meet these limits in one pass through 200 Area ETF treatment process is recycled to 200 Area ETF for re-processing.

There are some aqueous wastes, whose chemical and physical properties preclude that waste from being treated or stored at the LERF or 200 Area ETF. Accordingly, an aqueous waste is evaluated to determine if it is treatable, if it would impair the efficiency or integrity of the LERF or 200 Area ETF, and if it is compatible with materials in these units. This evaluation also determines if the aqueous waste is compatible with other aqueous wastes managed in the LERF.

The waste acceptance criteria in this category focus on determining treatability of an aqueous waste stream, and on determining any operational concerns that would prohibit the storage or treatment of an aqueous waste stream in the LERF or 200 Area ETF. The chemical and physical properties of an aqueous waste stream are determined as part of the waste characterization, and are documented on the waste profile sheet and compared to the design of the units to determine whether an aqueous waste stream is appropriate for storage and treatment in the LERF and 200 Area ETF. All decisions and supporting rationale and data will be documented in the Hanford Facility Operating Record, LERF and 200 Area ETF File according to Permit Condition II.I.

B.2.2.3 Special Requirements Pertaining to Land Disposal Restrictions

Containers of 200 Area ETF secondary waste are transferred to a storage or final disposal unit, as appropriate (e.g., the Central Waste Complex or to the Environmental Restoration Disposal Facility). 200 Area ETF personnel provide the analytical characterization data and necessary process knowledge for the waste to be managed by the receiving staff, and the appropriate LDR documentation.

The following information on the secondary waste is included on the LDR documentation provided to the receiving unit:

- Dangerous waste numbers (as applicable)
- Determination on whether the waste is restricted from land disposal according to the requirements of 40 CFR 268 incorporated by reference by WAC 173-303-140 (i.e., the LDR status of the waste)

The waste tracking information associated with the transfer of waste

- Waste analysis results.

Generally, the operating parameters or operating configuration at the LERF or 200 Area ETF can be adjusted or modified to accommodate these properties. However, in those cases where a treatment process or operating configuration cannot be modified, the aqueous waste stream will be excluded from treatment or storage at the LERF or 200 Area ETF. Additionally, an aqueous waste stream is evaluated for the potential to deposit solids in a LERF basin (i.e., whether an aqueous waste contains sludge or could precipitate solids). This evaluation will also consider whether the blending or mixing of two or more aqueous waste streams will result in the formation of a precipitate. However, because the waste streams managed in the LERF and 200 Area ETF are generally dilute, the potential for mixing waste streams and forming a precipitate is low; no specific compatibility tests are performed. Filtration at the waste source could be required before acceptance into LERF. Waste streams with the potential to form precipitates in LERF or that cannot be blended with other waste streams to avoid precipitate formation are not accepted for treatment at LERF and 200 Area ETF. The Load-in Facility has the ability to perform filtration on incoming waste streams going to both the LERF and 200 Area ETF Load in. See additional discussions of precipitate formation and compliance with LDR requirements in Section B.3. Similar filtration requirements could apply to aqueous waste fed directly to 200 Area ETF without interim treatment in LERF.

To determine if an aqueous waste meets the criterion of treatability, specific information is required. Treatability of a waste stream is evaluated from characterization data provided by the generator as verified through the waste acceptance process, the 200 Area waste acceptance criteria, and the treatability envelope for the 200 Area ETF as documented in Tables C.1 and C.2 of the November 29, 2001 delisting petition. Generators will also provide characterization data to identify those physical and chemical properties that would interfere with, or foul 200 Area ETF treatment process in consultation with LERF and 200 Area ETF representatives. In some instances, knowledge that meets the definition of *knowledge* in WAC 173-303-040 is used for purposes of identifying a chemical or physical property that would be of concern. For example, the generator could provide knowledge that the stream has two phases (an oily phase and an aqueous phase). In this case, if the generator could not physically separate the two phases, the aqueous waste stream would be rejected because the oily phase could compromise some of the treatment equipment. Typically, analyses for the following parameters are required to evaluate treatability and operational concerns:

- total dissolved solids
- total organic carbon
- total suspended solids
- specific conductivity
- pH
- alkalinity
- ammonia
- barium
- calcium
- chloride
- fluoride
- iron
- magnesium
- nitrate
- nitrite
- phosphate
- potassium
- silicon
- sodium
- sulfate

These constituents are identified in Table B.2, which is the list of target analytes used for waste characterization and waste acceptance evaluation.

B.2.2.3.1 Compatibility

Corrosion Control. Because of the materials of construction used in 200 Area ETF, corrosion is generally not a concern with new aqueous waste streams. Additionally, these waste streams are managed in a manner that minimizes corrosion. To ensure that a waste will not compromise the integrity of 200 Area ETF tanks and process equipment, each waste stream is assessed for its corrosion potential as part of the compatibility evaluation. This assessment usually focuses on chloride and fluoride concentrations; however, the chemistry of each new waste also is evaluated for other parameters that could cause corrosion.

Compatibility with Liquid Effluent Retention Facility Liner and Piping. As part of the acceptance process, the criteria of compatibility with the LERF liner materials are evaluated for each aqueous waste stream. This evaluation is performed using knowledge (as defined by WAC 173-303-040) of constituent concentrations in the aqueous waste stream or using constituent concentrations obtained by analyzing the waste stream for the constituents identified in Table B.1 using the analytical methods for these constituents in Section B.9. Then, the constituent concentrations in the waste stream are compared to the decision criteria in Table B.1. If all constituent concentrations are below the decision criteria, then the waste stream is considered compatible with the LERF liner and may be accepted for treatment. Otherwise, the waste stream is considered incompatible with the LERF liner, and it cannot be accepted for treatment in the LERF basins. However, a waste stream may still be acceptable for treatment in ETF if it is fed directly to ETF, bypassing the LERF Basins. Results of this evaluation are documented in the Hanford Facility Operating Record, LERF and 200 Area ETF File according to Permit Condition II.I. The rational for establishing the liner compatibility constituents and decision criteria in Table B.1 is as follows: The high-density polyethylene liners in the LERF basins potentially are vulnerable to the presence of certain constituents that might be present in some aqueous waste. Using EPA SW-846, Method 9090, the liner materials were tested to evaluate compatibility between aqueous waste stored in the LERF and synthetic liner components. Based on the data from the compatibility test and vendor data on the liner materials, several constituents and parameters were identified as potentially harmful (at high concentrations) to the integrity of the liners. From these data and the application of safety factors, concentration limits in Table B.1 were established.

The strategy for protecting the integrity of a LERF liner is to establish upfront that an aqueous waste is compatible before the waste is accepted into LERF. Characterization data on each new aqueous waste stream are compared to the limits outlined in Table B.1 to ensure compatibility with the LERF liner material before acceptance into the LERF.

Before a waste stream is processed at the 242-A Evaporator, the generator reviews DST analytical data and a process condensate profile is developed to ensure the process condensate is compatible with the LERF liner. For flow through aqueous wastes like the 200-UP-1 Groundwater, characterization data will be obtained and reviewed every two years to ensure that liner compatibility is maintained.

In some instances, knowledge may be adequate to determine that an aqueous waste is compatible with the LERF liner. When knowledge is used, it must satisfy the definition of *knowledge* in WAC 173-303-040. In those instances where knowledge is adequate, the waste characterization would likely not require analysis for these parameters and constituents. Storm water is an example where knowledge is adequate to determine that this aqueous waste is compatible with the LERF liner.

Compatibility with Other Waste. Some aqueous wastes, especially small volume streams, are accumulated in the LERF with other aqueous waste. Before acceptance into the LERF, the aqueous waste stream is evaluated for its compatibility with the resident aqueous waste(s). The evaluation focuses on the potential for an aqueous waste to react with another waste (40 CFR 264, Appendix V, *Examples of Potentially Incompatible Wastes*) including formation of any precipitate in the LERF basins. However, the potential for problems associated with commingling aqueous wastes is very low due to the dilute nature of the wastes; this evaluation confirms the compatibility of two or more aqueous wastes from different sources. Compatibility is determined by evaluating parameters such as pH, ammonia, and chloride. No specific analytical test for compatibility is performed.

If it is determined that an aqueous waste stream is incompatible with other aqueous waste streams, alternate management scenarios are available. For example, another LERF basin that contains a compatible aqueous waste(s) might be used, or the aqueous waste stream might be fed directly into 200 Area ETF for treatment. In any case, potentially incompatible waste streams are not mixed, and all aqueous waste is managed in a way that precludes a reaction, degradation of the liner, or interference with 200 Area ETF treatment process.

B.2.3 Periodic Review Process

In accordance with WAC 173-303-300(4)(a), an influent aqueous waste will be periodically reviewed as necessary to ensure that the characterization is accurate and current. At a minimum, an aqueous waste stream will be reviewed in the following situations.

- The LERF and 200 Area ETF management have been notified, or have reason to believe that the process generating the waste has changed.
- The LERF and 200 Area ETF management note an increase or decrease in the concentration of a constituent in an aqueous waste stream, beyond the range of concentrations that was described or predicted in the waste characterization.
- Waste streams will be reviewed every two years

In these situations, LERF and 200 Area ETF management will review the available information. If existing analytical information is not sufficient, the generator may be asked to review and update the current waste characterization, to supply a new WPS, or re-sample and re-analyze the aqueous waste, as necessary. Other situations that might require a re-evaluation of a waste stream are discussed in the following sections.

B.2.4 Record/Information and Decision

The information and data collected throughout the acceptance process, and the evaluation and decision on whether to accept an influent aqueous waste stream for treatment or storage in the LERF or 200 Area ETF are documented as part of Hanford Facility Operating Record, LERF and 200 Area ETF File pursuant to Permit Condition II.I. Specifically, the Hanford Facility Operating Record, LERF and 200 Area ETF File contains the following components on a new influent aqueous waste stream:

- The signed WPS for each aqueous waste stream and analytical data
- Knowledge used to characterize a dangerous/mixed waste (under WAC 173-303), and information supporting the adequacy of the knowledge
- The evaluation on whether an aqueous waste stream meets the waste acceptance criteria, including:
  - The evaluation for regulatory acceptability including appropriate regulatory approvals
  - The evaluation for LERF liner compatibility and for compatibility with other aqueous waste

Table B.1. General Limits for Liner Compatibility

Chemical Family	Constituent(s) or Parameter(s)[1]	Limit (mg/L)[2] (sum of constituent concentrations)
Alcohol/glycol	1-butanol	500,000
Alkanone[3]	acetone,	200,000
Alkenone[4]	none targeted	N/A
Aromatic/cyclic hydrocarbon	acetophenone, benzene, carbozole, chrysene, cresol, di-n-octyl phthalate, diphenylamine, isophorone, pyridine, tetrahydrofuran	2000
Halogenated hydrocarbon	arochlors, carbon tetrachloride, chloroform, hexachlorobenzene, lindane (gamma-BHC), hexachlorocyclopentadiene, methylene chloride, p-chloroaniline, tetrachloroethylene, 2,4,6-trichlorophenol	2000
Aliphatic hydrocarbon	none targeted	N/A
Ether	dichloroisopropyl ether	2000
Other hydrocarbons	acetontrile, carbon disulfide, n-nitrosodimethylamine, tributyl phosphate	2000
Oxidizers	none targeted	NA
Acids, Bases, Salts	ammonia, cyanide, anions, cations	100,000
pH	pH	$0.5 < pH < 13.0$

[1]Analytical methods for the parameters and constituents are provided in Section B.9

[2]Analytical data are evaluated using the following 'sum of the fraction' technique. The individual constituent concentration is evaluated against the compatibility limit for its chemical family. The sum of the evaluations must be less than 1. pH is not part of this evaluation.

$$\sum_{n=1}^{i}\left(\frac{Conc_n}{LIMIT_n}\right) \le 1$$

[3]Ketone containing saturated alkyl group(s)

[4]Ketone containing unsaturated alkyl group(s)

Where 'i' is the number of organic constituents detected

mg/L = milligrams per liter

NA = not applicable

Table B.2. Waste Acceptance Criteria

General criteria category	Criteria description
1. Characterization	A. Each generator must provide an aqueous waste profile.
	B. Each generator must designate the aqueous waste stream.
	C. Each generator must provide analytical data and/or knowledge.
2. Regulatory acceptability	A. The LERF and 200 Area ETF can store and treat influent aqueous wastes with waste numbers identified in Addendum A for the LERF and 200 Area ETF, and the 200 Area ETF Delisting, 40 CFR 261, Appendix IX, Table 2.
	B. The aqueous waste must comply with conditions of the Discharge Permit.
3. Operational acceptability	A. Determine whether an aqueous waste stream is treatable, considering: 1. Whether the removal and destruction efficiencies on the constituents of concern will be adequate to meet the Discharge Permit and Delisting levels 2. Other treatability concerns; analyses for this evaluation may include: total dissolved solids, iron total organic carbon, magnesium total suspended solids, nitrate specific conductivity, nitrite alkalinity, phosphate ammonia, potassium barium, silicon calcium, sodium chloride, sulfate fluoride, pH
	B. Determine whether an aqueous waste stream is compatible, considering: 1. Whether an aqueous waste stream presents corrosion concerns with respect to ETF; analysis may include chloride and fluoride 2. Whether an aqueous waste stream is compatible with LERF liner materials, compare characterization data to the liner compatibility limits (Table B.1). 3. Whether an aqueous waste stream is compatible with other aqueous waste(s), 40 CFR 264, Appendix V, comparison will be used.

B.3 SPECIAL MANAGEMENT REQUIREMENTS

Special management requirements for aqueous wastes that are managed in the LERF or 200 Area ETF are discussed in the following section.

B.3.1 Land Disposal Restriction Compliance at Liquid Effluent Retention Facility

Because LERF provides treatment through flow and pH equalization, a surface impoundment treatment exemption from the land disposal restrictions was granted in accordance with 40 CFR 268.4, and WAC 173-303-040. This treatment exemption is subject to several conditions, including a requirement that the WAP address the sampling and analysis of the treatment 'residue' [40 CFR 268.4(a)(2)(i) and WAC 173-303-300(5)(h)(i) and (ii)] to ensure the 'residue' meets applicable treatment standards. Though the term 'residue' is not specifically defined, this condition further requires that sampling must be designed to represent the "sludge and the supernatant" indicating that a residue may have a sludge (solid) and supernatant (liquid) component.

Solid residue is not anticipated to accumulate in a LERF basin for the following reasons:

- Aqueous waste streams containing sludge would not be accepted into LERF under the acceptance criteria of treatability (Section B.2.2.2.1)
- No solid residue was reported from process condensate discharged to LERF in 1995

- The LERF basins are covered and all incoming air first passes through a breather filter
- No precipitating or flocculating chemicals are used in flow and pH equalization.
- Multiple waste streams managed in a single LERF basin are evaluated for the formation of precipitates. Wastes that would form precipitates are not accepted for treatment at LERF.

Therefore, the residue component subject to this condition is the supernatant (liquid component). Additionally, an aqueous waste stream is evaluated for the potential to deposit solids in a LERF basin (i.e., an aqueous waste that contains suspended solids). If necessary, filtration at the waste source could be required before acceptance into LERF. Therefore, the residue component in LERF subject to this condition is the supernatant (liquid component). The contingency for removal of solids will be addressed during closure in Addendum H, Closure Plan.

The conditions of the treatment exemption also require that treatment residues (i.e., aqueous wastes), which do not meet the LDR treatment standards "must be removed at least annually" [40 CFR 268.4(a)(2)(ii) incorporated by reference by WAC 173-303-140]. To address the conditions of this exemption, an influent aqueous waste is sampled and analyzed and the LDR status of the aqueous waste is established as part of the acceptance process. The LERF basins are then managed such that any aqueous waste(s), which exceeds an LDR standard is removed annually from a LERF basin, except for a heel of approximately 1 meter. A heel is required to stabilize the LERF liner. The volume of the heel is approximately 1.9 million liters.

B.4 INFLUENT AQUEOUS WASTE SAMPLING AND ANALYSIS

The following sections provide a summary of the sampling procedures, frequencies, and analytical parameters for characterization of influent aqueous waste (Section B.2) and in support of the special management requirements for aqueous waste in the LERF (Section B.3).

B.4.1 Sampling Procedures

With a few exceptions, generators are responsible for the characterization, including sampling and analysis, of an influent aqueous waste. Process condensate is either sampled at the 242-A Evaporator or accumulated in a LERF basin following a 242-A Evaporator campaign and sampled. Other exceptions will be handled on a case-by-case basis and the Hanford Facility Operating Record, LERF and 200 Area ETF File will be maintained at the unit for inspection by Ecology. The following section discusses the sampling locations, methodologies, and frequencies for these aqueous wastes. For samples collected at the LERF and 200 Area ETF, unit-specific sampling protocol is followed. The sample containers, preservation materials, and holding times for each analysis are listed in Section B.9.

B.4.1.1 Batch Samples

In those cases where an aqueous waste is sampled in a LERF basin, samples are collected from four of the six available sample risers located in each basin, i.e., four separate samples. When LERF levels are low, fewer than four samples can be taken if the sampling approach is still representative. Though there are eight sample risers at each basin, one is dedicated to liquid level instrumentation and another is dedicated as an influent port. Operating experience indicates that four samples adequately capture the spatial variability of an aqueous waste stream in the LERF basin. Specifically, sections of stainless steel (or other compatible material) tubing are inserted into the sample riser to an appropriate depth. Using a portable pump, the sample line is flushed with the aqueous waste and the sample collected. The grab sample containers typically are filled for volatile organic compounds (VOC) analysis first, followed by the remainder of the containers for the other parameters.

Several sample ports are also located at 200 Area ETF, including a valve on the recirculation line at 200 Area ETF surge tank, and a sample valve on a tank discharge pump line at 200 Area ETF Load-in Station. All samples are obtained at the LERF or 200 Area ETF are collected in a manner consistent with SW-846 procedures (EPA as amended).

B.4.2 Analytical Rationale

As stated previously, each generator is responsible for designating and characterizing an aqueous waste stream. Accordingly, each generator samples and analyzes an influent waste stream using the target list of parameters (Table B.3) for the waste acceptance process. At the discretion of the LERF and ETF management, a generator may provide knowledge in lieu of some analyses as discussed in Section B.2.1.1. The LERF and ETF personnel will work with the generator to determine which parameters are appropriate for the characterization.

The analytical methods for these parameters are provided in Section B.9. All methods are EPA methods satisfying the requirements of WAC 173-303-110(3). Additional analyses may be required if historical information and knowledge indicate that an influent aqueous waste contains constituents not included in the target list of parameters. For example, if knowledge indicates that an aqueous waste contains a parameter that is regulated by the Groundwater Quality Criteria (WAC 173-200), that parameter(s) would be added to the suite of analyses required for that aqueous waste stream.

The analytical data for the parameters presented in Table B.3, including VOC, SVOC, metals, anions, and general chemistry parameters are used to define the physical and chemical properties of the aqueous waste for the following:

- Set operating conditions in the LERF and ETF (e.g., to determine operating configuration , refer to Section B.2.2.2)
- Identify concentrations of some constituents which may also interfere with, or foul ETF treatment process (e.g., fouling of the RO membranes, refer to Section B.2.2.2)
- Evaluate LERF liner and piping material compatibility
- Determine treatability to evaluate if applicable constituents in the treated effluent will meet Discharge Permit and Delisting limits
- Estimate concentrations of some constituents in the waste generated in the secondary treatment train (i.e., dry powder waste).

Table B.3. Target Parameters for Influent Aqueous Waste Analyses

VOLATILE ORGANIC COMPOUNDS	SEMIVOLATILE ORGANIC COMPOUNDS
Acetone	Acetophenone
Acetonitrile	Cresol (o, p, m)
Benzene	Dichloroisopropyl ether (bis(2-chloropropyl)ether)
1-Butanol	Di-n-octyl phthalate
Carbon disulfide	Diphenylamine
Carbon tetrachloride	Hexachlorobenzene
Chloroform	Hexachlorocyclopentadiene
Methylenechloride	Iosophorone
Tetrachloroethylene	Lindane (gamma-BHC)
Tetrahydrofuran	N-nitrosodimethylamine
	Pyridine
	Tributyl phosphate
	2,4,6-Trichlorophenol

TOTAL METALS		ANIONS
Arsenic	Magnesium	Chloride
Barium	Mercury	Fluoride
Beryllium	Nickel	Nitrate
Cadmium	Potassium	Nitrite
Calcium	Selenium	Phosphate
Chromium	Silicon	Sulfate
Copper	Silver	**GENERAL CHEMISTRY PARAMETERS**
Iron	Sodium	Ammonia
Lead	Vanadium	Cyanide
	Zinc	pH
		Total suspended solids
		Total dissolved solids
		Total organic carbon
		Specific conductivity

B.5 TREATED EFFLUENT SAMPLING AND ANALYSIS

The treated aqueous waste, or effluent, from 200 Area ETF is collected in three 2,940,000-liter verification tanks before discharge to the SALDS. To determine whether the Discharge Permit early warning values, enforcement limits, and the Delisting criteria are met, the effluent routinely is sampled at the verification tanks. The sampling and analyses performed are described in the following sections.

B.5.1 Rationale for Effluent Analysis Parameter Selection

The parameters measured in the treated effluent are required by the following regulatory documents:

- Delisting criteria from the 200 Area ETF Delisting (40 CFR 261, Appendix IX, Table 2)
- Corresponding State Final Delisting issued pursuant to WAC 173-303-910(3)
- Effluent limits from the Washington State Waste Discharge Permit (No. ST 4500)
- Early warning values from the Washington State Waste Discharge Permit (No. ST 4500)

The 200 Area ETF Delisting provides two testing regimes for the treated effluent. Initial verification testing is performed when a new influent waste stream is processed through the 200 Area ETF. For each 200 Area ETF influent waste stream, the first generated verification tank must be sampled and analyzed for all delisting constituents and conductivity. Subsequent verification sampling and analysis of all delisting parameters is performed on every 15th tank of that 200 Area ETF influent waste stream. If the concentration of any analyte is found to exceed a Washington State Waste Discharge Permit (No. ST 4500), enforcement limit or a Delisting criterion, the contents of the verification tank are reprocessed and/or re-analyzed. The next verification tank generated is also sampled for all delisting constituents. If the concentration of any analyte exceeds an early warning value, an early warning value report is prepared and submitted to Ecology.

B.5.2 Effluent Sampling Strategy: Methods, Location, Analyses, and Frequency

Effluent sampling methods and locations, the analyses performed, and frequency of sampling are discussed in the following sections.

B.5.2.1 Effluent Sampling Method and Location

Samples of treated effluent are collected and analyzed to verify the treatment process using 200 Area ETF specific sampling protocol. These verification samples are collected at a sampling port on the verification tank recirculation line. Section B.9 presents the sample containers, preservatives, and holding times for each parameter monitored in the effluent.

B.5.2.2 Analyses of Effluent

The parameters required by the current Washington State Waste Discharge Permit (No. ST 4500), and Final Delisting 200 Area ETF, conditions are presented in Table B.4. The analytical methods and PQLs associated with each parameter are provided in Section B.9. The methods and PQLs are equivalent to those used in the analysis of influent aqueous waste.

B.5.2.3 Frequency of Sampling

Treated effluent is tested for all parameters listed in Table B.4 on a frequency satisfying the permit conditions of the Washington State Waste Discharge Permit (No. ST 4500), and the 200 Area ETF Delisting. This effluent must meet the Washington State Waste Discharge Permit (No. ST 4500), and 200 Area ETF Delisting limits associated with these parameters. Grab samples are collected from each verification tank.

During operation of 200 Area ETF, if one or more of the constituents exceeds a Delisting criterion, the Delisting conditions require:

- The characterization data and processing strategy of the influent waste stream be reviewed and changed accordingly to ensure the contents of subsequent tanks do not exceed the Delisting criteria
- The contents of the verification tank are recycled for additional treatment. The contents that are recycled are resampled after treatment to ensure no constituents exceed a Delisting criteria
- The contents of the following verification tank are sampled for compliance with the Delisting criteria.
- Treated effluent that does not meet Washington State Waste Discharge Permit (No. ST 4500) is not discharged to the SALDS until the tank has been retreated and/or reanalyzed.

B.6 EFFLUENT TREATMENT FACILITY GENERATED WASTE SAMPLING AND ANALYSIS

The wastes discussed in this section include the wastes generated at 200 Area ETF and are managed in the container storage areas of 200 Area ETF. This section describes the characterization of the following secondary waste streams generated within 200 Area ETF:

- Secondary waste generated from the treatment process, including the following waste forms:
  - dry powder waste
  - concentrate tanks slurry
  - sludge removed from process tanks
- Waste generated by operations and maintenance activities

- Miscellaneous waste generated within 200 Area ETF.

For each waste stream described, a characterization methodology and rationale are provided, and sampling requirements are addressed.

B.6.1 Secondary Waste Generated from Treatment Processes

The following terms used in this Section, including powder, dry powder, waste powder, and dry waste powder, are equivalent to the term 'dry powder waste'.

A dry powder waste is generated from the secondary treatment train, from the treatment of an aqueous waste. Waste is received in the secondary treatment train in waste receiving tanks where it is fed into an evaporator. Concentrate waste from the evaporator is then fed to a concentrate tank. From these tanks, the waste is fed to a thin film dryer and dried into a powder, and collected into containers. The containers are filled via a remotely controlled system. The condensed overheads from the evaporator and thin film dryer are returned to the surge tank to be fed to the primary treatment train.

Occasionally, salts from the treatment process (e.g., calcium sulfate and magnesium hydroxide) accumulate in process tanks as sludge. Because processing these salts could cause fouling in the thin film dryer, and to allow uninterrupted operation of the treatment process, the sludge is removed and placed in containers. The sludge is dewatered and the supernate is pumped back to 200 Area ETF for treatment.

The secondary treatment system typically receives and processes the following by-products generated from the primary treatment train:

- Concentrate from the first RO stage
- Backwash from the rough and fine filters
- Regeneration waste from the ion exchange system
- Spillage or overflow collected in the process sumps.

In an alternate operating scenario, some aqueous wastes may be fed to the secondary treatment train before the primary treatment train.

B.6.1.1 Special Requirements Pertaining to Land Disposal Restrictions

Containers of 200 Area ETF secondary waste are transferred to a storage or final disposal unit, as appropriate (e.g., the Central Waste Complex or to the Environmental Restoration Disposal Facility). 200 Area ETF personnel provide the analytical characterization data and necessary knowledge for the waste to be managed by the receiving staff, and for the appropriate LDR documentation.

The following information on the secondary waste is included on the LDR documentation provided to the receiving unit:

- Dangerous waste numbers (as applicable)

- Determination on whether the waste is restricted from land disposal according to the requirements of 40 CFR 268 incorporated by reference by WAC 173-303-140 (i.e., the LDR status of the waste)

The waste tracking information associated with the transfer of waste

- Waste analysis results.

B.6.1.2 Sampling Methods

The dry powder waste and containerized sludge are sampled from containers using the principles presented in SW-846 (EPA as amended) and ASTM Methods (American Society for Testing Materials), as referenced in WAC 173-303-110(2). The sample container requirements, sample preservation requirements, and maximum holding times for each of the parameters analyzed in either matrix are presented in Section B.9.

Concentrate tank waste samples are collected from recirculation lines, which provide mixing in the tank during pH adjustment and prevent caking. The protocol for concentrate tank sampling prescribes opening a sample port in the recirculation line to collect samples directly into sample containers. The sample port line is flushed before collecting a grab sample. The VOC sampling typically is performed first for grab samples. Each VOC sample container will be filled such that cavitation at the sample valve is minimized and the container has no headspace. The remainder of the containers for the other parameters will be filled next.

Table B.4. Rationale for Parameters to be Monitored in Treated Effluent

Parameter	(Cas No.)	200 Area ETF Delisting[1]	Discharge Permit[2]	
			Enforcement Limit	Early Warning Value
VOLATILE ORGANIC COMPOUNDS				
Acetone	(67-64-1)	X		
Acetonitrile	(75-05-8)	X		
Benzene	(71-43-2)	X		X
1-Butanol	(71-36-3)	X		
Carbon disulfide	(75-15-0)	X		
Carbon tetrachloride	(56-23-5)	X	X	
Chloroform	(67-66-3)			X
Methylene Chloride	(75-09-2)		M	
Tetrachloroethylene	(127-18-4)		X	
Tetrahydrofuran	(109-99-9)	X		X
SEMIVOLATILE ORGANIC COMPOUNDS				
Acetophenone	(98-86-2)		X	
Carbazole	(86-74-8)	X		
p-Chloroaniline	(106-47-8)	X		
Chrysene	(218-01-9)	X		
Cresol (total)	(1319-77-3)	X		
Dichloroisopropyl ether (bis(2-chloroisopropyl)ether)	(108-60-1)	X		
Di-n-octyl phthalate	(117-84-0)	X		
Diphenylamine	(122-39-4)	X		
Hexachlorobenzene	(118-74-1)	X		
Hexachlorocyclopentadiene	(77-47-4)	X		
Isophorone	(78-59-1)	X		
Lindane (gamma-BHC)	(58-89-9)	X		
N-nitrosodimethylamine	(62-75-9)	X	X	
Pyridine	(110-86-1)	X		
Tributyl phosphate	(126-73-8)	X		
2,4,6-Trichlorophenol	(88-06-2)	X		
PCBs				
Aroclor 1016	(12674-11-2)	X		
Aroclor 1221	(11104-28-2)	X		
Aroclor 1232	(11141-16-5)	X		
Aroclor 1242	(53469-21-9)	X		
Aroclor 1248	(12672-29-6)	X		
Aroclor 1254	(11097-69-1)	X		
Aroclor 1260	(11096-82-5)	X		
TOTAL METALS3				
Arsenic	(7440-38-2)	X	X	
Barium	(7440-39-3)	X		
Beryllium	(7740-41-7)	X	X	

Table B.4. Rationale for Parameters to be Monitored in Treated Effluent

			Discharge Permit[2]	
Parameter	**(Cas No.)**	**200 Area ETF Delisting[1]**	**Enforcement Limit**	**Early Warning Value**
Cadmium	(7440-43-9)	X		X
Chromium	(7440-47-3)	X	X	
Copper	(7440-50-8)			X
Lead	(7439-92-1)	X		X
Mercury	(7439-97-6)	X		X
Nickel	(7440-02-0)	X		
Selenium	(7782-49-2)	X		
Silver	(7440-22-4)	X		
Vanadium	(7440-62-2)	X		
Zinc	(7440-66-6)	X		
ANIONS				
Chloride	(16887-00-6)		X	
Fluoride	(16984-48-8)	X		
Nitrate (as N)	(14797-55-8)		X	
Nitrite (as N)	(1479765-0)		X	
Sulfate	(14808-79-8)		X	
OTHER ANALYSES				
Ammonia	(7664-41-7)	X	X	
Cyanide	(57-12-5)	X		
Total dissolved solids				X
Total organic carbon			X	
Total suspended solids			X	
Specific conductivity			M	

[1]Parameters required by the current conditions of the 200 Area ETF Delisting, 40 CFR 261, Appendix IX, Table 2,70 FR 44496 (EPA 2005)
[2]Parameters required by the current conditions of the State Waste Discharge Permit, No. ST 4500
[3]Metals reported as total concentrations
X = Rationale for measuring this parameter in treated effluent
M = Monitor only; no limit defined
PCBs = polychlorinated biphenyls

B.6.1.3 Sampling Frequency

When designation or identification of applicable LDR treatment standards of the 200 Area ETF secondary waste cannot be based on influent characterization data or knowledge as described in Section B.6.1.1, 200 Area ETF secondary waste is sampled on a batch basis. A batch is defined as any volume of aqueous waste that is being treated under consistent and constant process conditions.

When personnel exposures are of concern, one representative sample will be collected from the concentrate tank, if waste from the concentrate tank. The sample will be analyzed for the appropriate parameters identified in Table B.5 based on the needs identified from evaluating influent waste analysis data. If sampling of the concentrate tank is not technically practicable for purposes of designating the powder, direct sampling of the dry powder will be used to make determinations on the dry powder. The dry powder or concentrate tanks will be resampled in the following situations:

- Change in influent characterization
- Change in process chemistry, as indicated by in-line monitoring of conductivity and pH

- The LERF and 200 Area ETF management have been notified, or have reason to believe that the process generating the waste has changed (for example, a source change such as a change in the well-head for groundwater that significantly changes the aqueous waste characterization).
- The LERF and 200 Area ETF management note an increase or decrease in the concentration of a constituent in an aqueous waste stream, beyond the range of concentrations that was described or predicted in the waste characterization.

B.6.2 Operations and Maintenance Waste Generated at the 200 Area Effluent Treatment Facility

Operation and maintenance of process and ancillary equipment generates additional routine waste. These waste materials are segregated to ensure proper handling and disposition, and to minimize the commingling of potentially dangerous waste with nondangerous waste. The following waste streams are anticipated to be generated during routine operation and maintenance of 200 Area ETF. This waste might or might not be dangerous waste, depending on the nature of the material and its exposure to a dangerous waste.

- Spent lubricating oils and paint waste from pumps, the dryer rotor, compressors, blowers, and general maintenance activities
- Spent filter media and process filters
- Spent ion exchange resin
- HEPA filters
- UV light tubes
- RO membranes
- Equipment that cannot be returned to service
- Other miscellaneous waste that might contact a dangerous waste (e.g., plastic sheeting, glass, rags, paper, waste solvent, or aerosol cans).

These waste streams are stored at 200 Area ETF before being transferred for final treatment, storage, or disposal as appropriate. This waste is characterized and designated using knowledge (from previously determined influent aqueous waste composition information); analytical data; and material safety data sheets (MSDS) of the chemical products present in the waste or used (the data sheets are maintained at 200 Area ETF). Sampling of these waste streams is not anticipated; however, if an unidentified or unlabeled waste is discovered, that waste is sampled. This 'unknown' waste is sampled and analyzed for the parameters in Table B.5 as appropriate, and will be designated according to Washington state regulatory requirements. The specific analytical methods for these analyses are provided in Section B.9.

B.6.3 Other Waste Generated at the 200 Area Effluent Treatment Facility

There are two other potential sources of waste at 200 Area ETF: spills and/or overflows, and discarded chemical products. Spills may be subject to the requirements of Permit Condition II.E. Spilled material that potentially might be dangerous waste generally is either containerized or routed to 200 Area ETF sumps where the material is transferred either to the surge tank for treatment or to the secondary treatment train. In most cases, knowledge and the use of MSDSs are sufficient to designate the waste material. If the source of the spilled material is unknown and the material cannot be routed to 200 Area ETF sumps, a sample of the waste is collected and analyzed according to Table B.5, as necessary, for appropriate characterization of the waste. Unknown wastes will be designated according to Washington State regulatory requirements at WAC 173-303-070. The specific analytical methods for these analyses are provided in Section B.9.

A discarded chemical product waste stream could be generated if process chemicals, cleaning agents, or maintenance products become contaminated or are otherwise rendered unusable. In all cases, these materials are appropriately containerized and designated. Sampling is performed, as appropriate, for waste designation.

Table B.5. 200 Area Effluent Treatment Facility Generated Waste - Sampling and Analysis

Parameter[1]	Rationale
• Total solids or percent water[2]	• Calculate dry weight concentrations
• Volatile organic compounds[3]	• LDR - verify treatment standards
• Semivolatile organic compounds[3]	• LDR - verify treatment standards
• Metals (arsenic, barium, cadmium, chromium, lead, mercury, selenium, silver)	• Waste designation • LDR - verify treatment standards
• Cation and anions of concern	• Address receiving TSD unit waste acceptance requirements
• pH	• Waste designation

1 For influent and concentrate tank samples, the total sample (solid plus liquid) is analyzed and the analytical result is expressed on a dry weight basis. The result for toxicity characteristic metal and organic is divided by a factor of 20 and compared to the toxicity characteristic (TC) constituent limits [WAC 173-303-090(8)]. If the TC limit is met or exceeded, the waste is designated accordingly. All measured parameters are compared against the corresponding treatment standards.

2 Total solids or percent water are not determined for unknown waste and dry powder waste samples and are analyzed in maintenance waste and sludge samples, as appropriate (i.e., percent water might not be required for such routine maintenance waste as aerosol cans, fluorescent tubes, waste oils, batteries, etc., or sludge that has dried).

3 VOC and/or SVOC analysis of secondary waste is required unless influent characterization data and knowledge indicate that the constituent will not be in the final secondary waste at or above the LDR.

LDR = land disposal restrictions

TSD = treatment, storage, and/or disposal

B.7 QUALITY ASSURANCE/QUALITY CONTROL

The following quality assurance/quality control (QA/QC) plan for LERF and 200 Area ETF is provided as required by WAC 173-303-810(6) and follows the guidelines of EPA QA/G-5.

B.7.1 Project Management

The following sections address project administrative functions and approaches.

B.7.1.1 Project Organization

Overall management of the LERF/200 Area ETF is performed by the Facility Manager, who is responsible for safe operation of the facility, including implementation of this QA/QC plan and compliance with applicable permits and regulations. The Facility Manager also provides retention of project records in accordance with this plan. Assisting the Facility Manager is an Environmental Field Representative ~~Compliance Officer (ECO)~~ that monitors compliance, reviews new requirements and regulations, and interfaces with EPA and Ecology. Also assisting the Facility Manager is a QA representative who is responsible for implementing the QA program at the facility.

Reporting to the Facility Manager are several support groups. The Operations group consists of trained personnel who operate the plant, including operators performing sampling activities such as collection, packaging, and transportation of samples to the laboratory. The Maintenance group is responsible for performing calibrations and preventative maintenance on facility equipment, including pH, conductivity, and flow meters required by environmental permits. The Engineering group monitors the process with online instruments and sampling for process control. The Engineering group also performs waste acceptance, and environmental compliance activities, including scheduling sampling, generating data forms, and reviewing data.

B.7.1.2 Special Training

Individuals involved in sampling, analysis, and data review will be trained and qualified to implement safely the activities addressed in this WAP and QA/QC plan. Training will conform to the training requirements specified in WAC 173-303-330 and the LERF/200 Area ETF Dangerous Waste Training Plan (Addendum F). Training records will be maintained in accordance with Section B.7.1.3 of this WAP.

B.7.1.3 Documentation and Records

Sample records are documented as part of the Hanford Facility Operating Record, LERF and 200 Area ETF File pursuant to Permit Condition II.I. These documents and records include the following:

- Training
- Chains of Custody for all regulatory sampling performed by LERF and 200 Area ETF
- Data Summary Reports
- QA/QC reports
- Assessment reports
- Instrument inspection, maintenance, and calibration logs

B.7.2 Data Quality Parameters and Criteria

Data quality parameters are listed by EPA QA/G-5S, *Guidance for Choosing a Sampling Design for Environmental Data Collection* as:

- Purpose of Data Collection (e.g. determining if a parameter exceeds a threshold level)
- Spatial and Temporal Boundaries of Study
- Preliminary Estimation of Sample Support (volume that each sample represents)
- Statistical Parameter of Interest (e.g. mean, percentile, percentage), and
- Limits on Decision Error/Precision (e.g. false acceptance error, false rejection error)

The parameters for the first four bullets (limits, sample points, frequency of samples, etc.) are already established in the permits, delisting petition, and this WAP. The focus of this QA/QC plan is on limits on decision error/precision.

The data quality parameters were chosen to ensure Limits on Decision Error/Precision are appropriate for purposes of using the data to demonstrate compliance with permits, delisting exclusion limits, and this WAP. The principal quality parameters are precision, accuracy, representativeness, comparability, and completeness. Secondary data parameters of importance include sensitivity and detection levels. The data quality parameters and the data acceptance criteria are discussed below.

B.7.2.1 Precision

Precision is a measure of agreement among replicate measurements of the same property, under prescribed similar conditions. Precision is expressed in terms of the relative percent difference (RPD) for duplicate measurements. QA/QC sample types that test precision include field and laboratory duplicates and spike duplicates. The RPDs for laboratory duplicates and/or matrix spike duplicates will be routinely calculated.

$$\mathrm{RPD} = (100)\,\textit{absolute value of}\left(\frac{\text{sample result} - \text{duplicate sample result}}{\text{average of sample result} + \text{duplicate sample result}}\right)$$

Matrix spike duplicates are replicates of matrix spike samples that are analyzed with every analytical batch that contains an ETF treated effluent sample. The precision of the analytical methods are estimated from the results of the matrix spike (MS) and the matrix spike duplicate (MSD) for selected analytes. Matrix spike analyses cannot be performed for certain analytical methods, including conductivity, pH, and total dissolved solids. Duplicate analyses are used to determine the RPD for these methods. The precision acceptance criteria are specified in Table B.6.

B.7.2.2 Accuracy

Accuracy assesses the closeness of the measured value to an accepted reference value. Accuracy of analytical results is typically assessed using matrix spikes. A matrix spike is the addition of a known amount of the analyte to the sample matrix being analyzed. Accuracy is expressed as a percent recovery of the spiked samples.

$$\text{Percent Recovery} = 100\left(\frac{\text{matrix spike sample result} - \text{sample result}}{\text{spiked amount}}\right)$$

Matrix spike analyses cannot be performed on certain analytical methods, including conductivity, pH, and total dissolved solids. The percent recovery for the laboratory control standard samples demonstrates that these methods are working properly and gives an estimate of the method's accuracy. The percent recovery will be routinely calculated.

Accuracy criteria are established to provide confidence that the result is below the action level. Therefore the closer the result is to the action level the higher the degree of accuracy needed. The upper and lower accuracy acceptance criteria are specified in Table B.6. The criteria are reasonable values based on previous analysis of constituents in the delisting exclusion, or similar constituents.

B.7.2.3 Representativeness

Representativeness expresses the degree to which data accurately and precisely represent selected characteristics of a parameter at a sampling point or process condition. Because of the matrix being analyzed, dilute aqueous solution, it is not expected that representativeness will be of concern, except when there are potential for changes to process conditions such as the facility influent concentrations or waste processing strategy. Sampling due to these changes in process conditions is addressed in Section B.6.1.3 of this WAP.

The representativeness of a sample may be compromised by the presence of contaminants introduced in the field or the laboratory. To determine if contamination may be present, a blank sample of reagent water is analyzed. A method blank is performed by the laboratory on every batch of 20 samples being analyzed at the same time. The presence of a constituent in the sample and the blank sample indicates contamination has occurred.

B.7.2.4 Completeness

Completeness is a measure of the amount of valid data obtained from a measurement system, expressed as a percentage of the number of valid measurements that were planned to be collected. Lack of completeness is sometimes caused by loss of a sample, loss of data, or inability to collect the planned number of samples. Incompleteness also occurs when data are discarded because they are of unknown or unacceptable quality. Since most regulatory sampling events performed by LERF/200 Area ETF involve a single sample, all analysis must be complete and valid.

B.7.2.5 Comparability

Comparability is the confidence with which one data set can be compared to another. Comparability is achieved by using sampling and analytical techniques, which provide for measurements that are consistent and representative of the media and conditions measured. In laboratory analysis, the term comparability focuses on method type, holding times, stability issues, and aspects of overall analytical quantitation.

B.7.2.6 Sensitivity and Detection Levels

Sensitivity is the measure of the concentration at which an analytical method can positively identify and report analytical results. Sensitivity represents the maximum value for a detection level that will reasonably assure the results are below the established limits. The analytical method selected by LERF/200 Area ETF should have a detection level for each constituent that is below the sensitivity. The preferred detection level is the practical quantitation limit (PQL), which is lowest concentration that can be reliably measured during routine laboratory conditions. If the method PQL cannot meet the sensitivity for some constituents, the minimum concentration or attribute that can be measured by a method (method detection limit) or by an instrument (instrument detection limit) may be used. The sensitivity levels, specified in Table B.6, are derived from the delisting limits, water discharge limits, and uncertainty values, which are based on the required precision and accuracy for each constituent.

B.7.3 Data Generation and Acquisition

The following section addresses QA requirements for data generation and acquisition.

B.7.3.1 Sampling Method

LERF/200 Area ETF samples required by the permits and delisting are collected as grab samples. Sampling for the purpose of waste designation of secondary waste is performed using grab, composite, thief, scoop, or composite liquid waste sampler (COLIWASA). The selection of the sample collection device depends on the type of sample, the sample container, the sampling location, and the nature and distribution of the waste components. In general, the methodologies used for specific materials correspond to those referenced to WAC 173-303-110(2). The selection and use of the sampling device is supervised or performed by a person thoroughly familiar with the sampling requirements.

The following protocol applies to all sampling methods:

- All containers will be filled within as short a time period as reasonably achievable.
- Volatile Organic Analysis (VOA) sample containers will be filled first, and prior to any subdividing of a composited sample.
- VOA samples consisting of a set of two or more sample containers will be filled sequentially. The sample containers are considered equivalent and given identical sampling times.
- All VOA sample containers must have no headspace and be free of trapped air bubbles.
- Grab sample protocol includes:
- Sample lines should be as short as reasonably achievable and free of traps and pockets in which solids might settle.
- The sample line should be flushed before sampling with a minimum volume equivalent to three times the sample line volume.
- Contamination to the sample from contact with the internal and external surfaces of the tap should be minimized.

Thief and COLIWASA samplers are used to sample liquid waste containers such as drums. Scoop samplers are used to sample powder waste generated in the thin-film dryer. Sample requirements for these samples include:

- Thief or COLIWASA sampler, the sampler should be lowered into the liquid slowly so the level of the liquid inside and outside the sampler tube remain about the same.
- When lifting the thief or COLIWASA sampler from the solution, the outside should be wiped down, or the excess water allowed to drip off, before filling the sample container.

B.7.3.2 Sample Handling, Custody, and Shipping

The proper handling of sample bottles after sampling is important to ensure the samples are free of contamination and to demonstrate the samples have not been tampered with.

B.7.3.2.1 Chain-of-Custody

Evidence of collection, shipment, receipt at the laboratory, and laboratory custody until disposal will be documented using a chain-of-custody form. The chain-of-custody form will, as a minimum identify sample identification number, sampling date and time, sampling location, sample bottle type and number, analyses to be performed, and preservation method.

The operations person who signs as the collector on the chain of custody is the first custodian of the samples. A custodian must maintain continuous custody of sample containers at all times from the time the sample is taken until delivery to the laboratory or until delivery to a common carrier for shipment to an off-site location. Custody is maintained by any of the following:

- The custodian has the samples in view, or has placed the samples in locked storage, or keeps the samples within a secured area (e.g., controlled by authorized personnel only), or has applied a tamper-indicating device, such as evidence tape, to the sample containers or shipping containers.
- The custodian has taken physical possession of the samples or the shipping containers sealed with an intact tamper-indicating device, such as evidence tape.

B.7.3.2.2 Sample Preservation, Containers, and Holding Time

Table B.6 lists the sample container, preservation method, and holding time requirements for different types of analyses. These parameters are based on the requirements of 40 CFR 136, Table II.

B.7.3.3 Instrument Calibration and Preventive Maintenance

LERF/200 Area ETF uses instruments to monitor operations and meet regulatory requirements. This includes continuous pH and conductivity monitors required by facility permits and delisting. All instruments are calibrated according to frequencies and tolerances established by the LERF/200 Area ETF engineering group. Calibrations and other maintenance actions are scheduled and tracked by LERF/200 Area ETF maintenance group using a preventive maintenance database. Measuring and test equipment used for instrument calibration is controlled, calibrated at specified intervals, and maintained to establish accuracy limits.

B.7.4 Assessment and Oversight

Quality programs can only be effective if meaningful assessments are performed to monitor and respond to issues associated with program performance. Routine assessment of data is performed as part of the validation process discussed in Section B.7.5.1.

B.7.4.1 Assessments and Response

Management assessments are conducted by first line management and subject matter experts, focusing on procedural adequacy, compliance, and overall effectiveness of the program. Management assessments of the sample program typically include the LERF and 200 Area ETF QA representative. Each management assessment has a performance objective or lines of inquiry. Examples may include personnel training, proper performance of sample custody, or completeness of sampling records.

B.7.4.2 Reports to Management

Results of performance assessments, including any issues identified, are provided to the LERF and 200 Area ETF Facility Manager in a written report. The Facility Manager is responsible to correct all findings from the report.

B.7.5 Verification and Validation of Analytical Data

The data verification and validation processes will ensure that the data resulting from the selected analytical method are consistent with requirements specified in this QA/QC plan.

B.7.5.1 Data Verification

The primary data reporting will be by electronic data systems. Data verification will be performed on laboratory data packages that support environmental compliance to ensure that their content is complete and in order. A review of the data package will be performed to ensure that:

- The data package contains the required technical information

- Deficiencies are identified and documented
- Identified deficiencies are corrected by the laboratory and the appropriate revisions are made
- Deficient pages are replaced with the laboratory corrections
- A copy of the completed verification report is placed in the data file

B.7.5.2 Data Validation

Data validation ensures that the data resulting from analytical measurements meet the quality requirements specified in the QA/QC plan. Data validation will be performed on data packages that support environmental compliance.

The following are included in data validation:

- Chain-of-Custody – Verify the COC shows unbroken custody from sampling through receipt at the laboratory.
- Request analysis – Review the sample results to verify the requested analysis was performed. If an alternate method was used, verify permit-required detection limits were met.
- Holding times – Review the sample results to verify the analyses were performed within required holing times and where applicable, extraction times.
- Blank – Review the results of trip, field, and equipment blank samples to verify the sample results are not compromised by contamination.
- Laboratory QC – Verify the laboratory QC was completed and there are no outstanding problems

B.8 REFERENCES

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Ecology, 1996b, *The Washington State Department of Ecology (Ecology) Regulatory Interpretation of the Liquid Effluent Retention Facility (LERF) Land Disposal Restriction Exemption*, letter from Washington State Department of Ecology to T. Teynor, U.S. Department of Energy and A. DiLiberto, Westinghouse Hanford Company, September 9, 1996.

Ecology, 2000, *Washington State Waste Discharge Permit* (No. ST 4500), as amended, for 200 Area Effluent Treatment Facility, Hanford Facility, Washington State Department of Ecology, Olympia, Washington, August 1, 2000.

EPA, 1983, *Methods for Chemical Analysis of Water Wastes*, EPA-600/4-79/020, (as amended), National Exposure Research Laboratory, Cincinnati, Ohio

EPA, *Test Methods for Evaluating Solid Waste Physical/Chemical Methods, SW-846* (Third Edition, as amended), U.S. Environmental Protection Agency, Office of Solid Waste and Emergency Response, Washington, D.C.

EPA, 1994, *Liquid Effluent Retention Facility (LERF) Land Disposal Restrictions Treatment Exemption-Regulatory Interpretation EPA/Ecology ID No: WA7890008967*, letter from U.S. Environmental Protection Agency, Region 10 to J. Hennig, U.S. Department of Energy, December 6, 1994.

EPA, 2005, 200 Area ETF Delisting [Exclusion], issued to U.S. Department of Energy, 40 CFR 261, Appendix IX, Table 2 (70 FR 44496, August 3, 2005), U.S. Environmental Protection Agency, Washington, D.C.

B.9 ANALYTICAL METHODS, SAMPLE CONTAINERS, PRESERVATIVE METHODS, AND HOLDING TIMES

Table B.6. Sample and Analysis Criteria for Influent Aqueous Waste and Treated Effluent

Parameter	Analytical Method[1]	Method PQL Sensitivity[2]	Accuracy/ Precision for Method[3] (percent)	Sample container[4]/ Preservative[4]/ Holding time[5]
VOLATILE ORGANIC COMPOUNDS				
Acetone	SW-846 8260	40	60-120 / 20	Sample container 3 x 40-mL amber glass with septum Preservative HCl to pH<2; 4°C Holding time 14 days
Acetonitrile		820	60-120 / 20	
Benzene		5	60-120 / 20	
1-Butanol		1600	60-120 / 20	
Carbon Disulfide		1500	60-120 / 20	
Carbon tetrachloride		5	60-120 / 20	
Chloroform		5	50-130 / 20	
Methylene chloride		5	50-150 / 20	
Tetrachloroethylene		5	65-140 / 20	
Tetrahydrofuran		100	60-120 / 20	
SEMIVOLATILE ORGANIC COMPOUNDS				
Acetophenone	SW-846 8270	10	70-110 / 25	Sample container 4 x 1-liter amber glass Preservative 4°C Holding time 7 days for extraction; 40 days for analysis after extraction
Carbazole		110	50-120 / 25	
p-Chloroaniline		76	50-120 / 25	
Chrysene		350	50-120 / 25	
Cresol (o, p, m)		760	50-120 / 25	
Di-n-octyl phthalate		300	50-120 / 25	
Diphenylamine		350	50-120 / 25	
Hexachlorobenzene		2	50-120 / 25	
Hexachlorocyclopentadiene		110	50-120 / 25	
Isophorone		2600	50-120 / 25	
Lindane (gamma-BHC)		1.9	50-120 / 25	
N-nitrosodimethylamine		12	50-120 / 25	
Pyridine		15	50-120 / 25	
Tributyl phosphate		76	50-120 / 25	
2.4.6-Trichlorophenol		230	50-120 / 25	

Table B.6. Sample and Analysis Criteria for Influent Aqueous Waste and Treated Effluent

Parameter	Analytical Method[1]	Method PQL Sensitivity[2]	Accuracy/ Precision for Method[3] (percent)	Sample container[4]/ Preservative[4]/ Holding time[5]
POLYCHLORINATED BIPHENYLs (PCBs)				
Aroclor-1016	SW-846 8082	0.4	50-110 / 25	Sample container 4 x 1-liter amber glass Preservative 4°C Holding time 1 year for extraction; 1 year for analysis after extraction
Aroclor-1221		0.4	50-110 / 25	
Aroclor-1232		0.4	50-110 / 25	
Aroclor-1242		0.4	50-110 / 25	
Aroclor-1248		0.4	50-110 / 25	
Aroclor-1254		0.4	50-110 / 25	
Aroclor-1260		0.4	50-110 / 25	
TOTAL METALS				
Arsenic	EPA-600 200.8	11	70-130 / 20	Sample container 1 x 0.5-liter plastic/glass Preservative 1:1 HNO_3 to pH<2 Holding time 180 days; mercury 28 days
Cadmium		5	70-130 / 20	
Chromium		20	70-130 / 20	
Copper		70	70-130 / 20	
Lead		10	70-130 / 20	
Mercury		2	70-130 / 20	
Selenium		20	70-130 / 20	
Barium	SW-846 6010/ EPA-600 200.7	1200	75 - 125 / 20	
Beryllium		34	75 - 125 / 20	
Calcium		200	75 - 125 / 20	
Iron		100	75 - 125 / 20	
Magnesium		400	75 - 125 / 20	
Nickel		340	75 - 125 / 20	
Potassium		10,000	75 - 125 / 20	
Silicon		580	75 - 125 / 20	
Silver		83	75 - 125 / 20	
Sodium		2500	75 - 125 / 20	
Vanadium		120	75 - 125 / 20	
Zinc		5100	75 - 125 / 20	

Table B.6. Sample and Analysis Criteria for Influent Aqueous Waste and Treated Effluent

Parameter	Analytical Method[1]	Method PQL Sensitivity[2]	Accuracy/ Precision for Method[3] (percent)	Sample container[4]/ Preservative[4]/ Holding time[5]
GENERAL CHEMISTRY				
Chloride	EPA-600 300.0	1000	70-130 / 20	Sample container 1 x 60-mL plastic/glass Preservative 4°C Holding time 28 days; nitrate and nitrite 48 hours
Fluoride		880	70-130 / 20	
Formate		1250	70-130	
Nitrate (as N)		100	70-130 / 20	
Nitrite (as N)		100	70-130 / 20	
Phosphate		1500	70-130 / 20	
Sulfate		10,000	70-130 / 20	
Ammonia (as N)	EPA-600, 300.7	40	70-130 / 20	Sample container 1 x 50-mL glass or plastic Preservative H_2SO_4 to pH<2; 4°C Holding time 28 days
Cyanide	EPA-600 335.2/335.3	350	70-130 / 20	Sample container 1 x 250-mL glass or plastic Preservative NaOH to pH>12; 4°C Holding time 14 days
Alkalinity	EPA-600 310.1/310.2	ND	ND	Sample container 1 x 50-mL glass or plastic Preservative 4°C Holding time 14 days
Total dissolved solids	EPA-600 160.1	ND	ND	Sample container 1 x 500-mL glass or plastic Preservative 4°C Holding time 7 days
Total suspended solids	EPA-600 160.2	ND	ND	Sample container 1 x 1-L glass or plastic Preservative 4°C Holding time 7 days

Table B.6. Sample and Analysis Criteria for Influent Aqueous Waste and Treated Effluent

Parameter	Analytical Method[1]	Method PQL Sensitivity[2]	Accuracy/ Precision for Method[3] (percent)	Sample container[4]/ Preservative[4]/ Holding time[5]
Specific conductivity	EPA-600 120.1 (in lab)	ND	ND	Sample container 1 x 50-mL glass or plastic Preservative 4°C Holding time 28 days
pH[7]	EPA-600 150.1	ND	ND	Sample container 1 x 60-mL glass or plastic Preservative None Holding time Analyze immediately
Total organic carbon	SW-846 9060	ND	ND	Sample container 1 x 250-mL amber glass Preservative H_2SO_4 to pH<2; 4°C Holding time 28 days

[1]SW-846 or EPA-600 methods are presented unless otherwise noted. Other methods might be substituted if the applicable PQL can be met.
[2]ST-4500 required method PQL or Delisting Exclusion condition 2 report sensitivity/detection level, whichever is lower. Units are parts per billion unless otherwise noted.
[3]Accuracy/precision used to confirm or re-establish MDL
[4]Sample bottle, volumes, and preservatives could be adjusted, as applicable, for safety reasons
[5]Holding time = time between sampling and analysis
[7]pH monitored in influent aqueous waste only
L = liter
mL = milliliter
NA = not applicable
ND = not determined
MDL = method detection level
PQL = practical quantitation limit
RL = reporting limit

Table B.7. Sample Containers, Preservative Methods, and Holding Times for 200 Area ETF Generated Waste

Parameter	Analytical Method	Method PQL	Accuracy/ Precision for Method (percent)	Sample container[1]/ Preservative[1]/ Holding time[2]
Liquid Matrix				
For methods other than total solids, analyze using the methods and QA/QC in Table B.6. For each method, analyze the target compound list				
Total solids	EPA-600 160.3	ND	ND	Sample container 1 x 500-mL glass or plastic Preservative – 4°C Holding time –7 days
Solid Matrix				
Volatile organic compounds (combined method target compound lists)	SW-846 8260	Refer to Table B.6	Refer to Table B.6	Sample container 1 x 40-mL amber glass with septum Preservative –4°C Holding time –14 days
Semivolatile organic compounds (method target compound list)	SW-846 8270	Refer to Table B.6	Refer to Table B.6	Sample container 1 x 125-mL amber glass Preservative –4°C Holding time –14 days for extraction; 40 days for analysis after extraction
PCBs (method target compound list)	SW-846 8082	Refer to Table B.6	Refer to Table B.6	Sample container Amber glass – 50 g of sample Preservative –4°C Holding time –1 year for extraction; 1 year for analysis after extraction
RCRA Metals (method target compound list)	EPA-600 200.8	Refer to Table B.6	Refer to Table B.6	Sample container glass or plastic – 10 g of sample Preservative –none, mercury 4°C Holding time –180 days; mercury 28 days
Total Metals (method target compound list)	SW-846 6010	Refer to Table B.6	Refer to Table B.6	
Anions (method target compound list)	EPA-600 300.0	Refer to Table B.6	Refer to Table B.6	Sample container glass or plastic –25 g of sample Preservative –none Holding time –6 months for extraction; 28 days for analysis after extraction, nitrate and nitrite 48 hours for analysis after extraction
Ammonia	EPA-600 300.7	Refer to Table B.6	Refer to Table B.6	Sample container glass or plastic – 25 g of sample Preservative –none Holding time –6 months for extraction; 28 days for analysis after extraction
pH	SW-846 9045	ND	ND	Sample container glass or plastic – 50 g of sample Preservative –none Holding time –none

Table B.7. Sample Containers, Preservative Methods, and Holding Times for 200 Area ETF Generated Waste

Parameter	Analytical Method	Method PQL	Accuracy/ Precision for Method (percent)	Sample container[1]/ Preservative[1]/ Holding time[2]
Toxicity Characteristic Leaching Procedure[3]	SW-846 1311	NA	NA	Sample container Refer to specific method being performed after TCLP – 125 g of sample Preservative –None (after TCLP, preserve extract per method being performed) Holding time –Metals: 180 days for TCLP extraction, mercury 28 days for TCLP extraction SVOA: 14 days for TCLP extraction (after TCLP, refer to specific methods for time for analysis after extraction)

[1] Sample bottle, volumes, and preservatives could be adjusted, as applicable, for safety reasons
[2] Holding time equals time between sampling and analysis
[3] Extraction procedure, as applicable; extract analyzed by referenced methods [WAC 173-303-110(3)(c)]
g = grams
NA = not applicable
PQL = practical quantitation limit
mL = milliliter
ND = not determined
TCLP = toxicity characteristic leaching procedure

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Hanford Facility RCRA Permit Change Notice	
Unit: **Liquid Effluent Retention Facility & 200 Area Effluent Treatment Facility**	Permit Part **Part III, Operating Unit Group 3**

Description of Modification:

Addendum C, Process Information

Table C.7, Ancillary Equipment and Material Data.

This modification provides notification of the equipment replacement for Heater (reboiler), Number 2025E-60I-E-01 identified in Table C.7 with functionally equivalent component. The Heater (reboiler) on the ETF evaporator system will be a replacement in kind (Tubes Alloy 625, and Shell 304 SS).

The terms "reboiler" and "heat exchanger" are synonymous with the term "heater" and the three terms are commonly used on site and in industry to describe heat exchangers at different facilities. This equipment should not be confused with the second heat exchanger in the 60I ETF evaporator system, which is called the "Feed/Distillate Heat Exchanger 2025E-60I-E-02."

The equipment repair was initially discussed with Ecology in December 2012, when a pinhole leak was discovered in September 2012, and repaired in January 2013; and again when another small leak was discovered on June 27, 2013. At the August 22, 2013, TPA Project Managers Meeting, DOE discussed with Ecology the equipment failure and the need to repair or replace the "heat exchanger" (Heater-reboiler).

The equipment replacement does not require modification to Addendum C.

WAC 173-303-830 Modification Class [1 2]	Class 1	Class [1]1	Class 2	Class 3
Please mark the Modification Class:	X			

Enter relevant WAC 173-303-830, Appendix I Modification citation number: A.3
Enter wording of WAC 173-303-830, Appendix I Modification citation: General Permit Provisions. 3. Equipment replacement or upgrading with functionally equivalent components (e.g., pipes, valves, pumps, conveyors, controls

Modification Approved: ☑ Yes ☐ No (state reason for denial)
Reason for denial:

Reviewed by Ecology:

S. L. Dahl-Crumpler 6/15/15
Date

Hanford Facility RCRA Permit Change Notice	
Unit: **Liquid Effluent Retention Facility & 200 Area Effluent Treatment Facility**	Permit Part **Part III, Operating Unit Group 3**

Description of Modification:

Addendum G, Personnel Training

- Updated Training Matrix title
- Changed the CH2M Hill Plateau Remediation Contractor (CHPRC) job title/position "Environmental Compliance Officer (ECO)" to the equivalent Washington River Protection Solutions (WRPS) "Environmental Field Representative" job title/position.
- Deleted the CHPRC "Hazardous Waste Coordinator (HWC)" job title/position because the responsibilities and training requirements of the CHPRC HWC position are fulfilled by the WRPS "Waste Service Provider" job title/position.

These changes do not affect the type or decrease the amount of training given to employees.

WAC 173-303-830 Modification Class [1 2]	Class 1	Class '1	Class 2	Class 3
Please mark the Modification Class:	X			

Enter relevant WAC 173-303-830, Appendix I Modification citation number: B.5.b

Enter wording of WAC 173-303-830, Appendix I Modification citation: General Facility Standards, Changes in the Training plan, other changes.

Modification Approved: [✓] Yes [ ] No (state reason for denial) Reason for denial:	Reviewed by Ecology: S. L. Dahl-Crumpler — Date 6/15/15

Addendum G Personnel Training

Specific requirements for the Hanford Facility Personnel Training program are described in Permit Attachment 5. The Permittees will comply with the training matrix below which provides training requirements for Hanford Facility personnel associated with the Liquid Effluent Retention Facility (LERF) and the 200 Area Effluent Treatment Facility (ETF). Refer to the LERF & 200 Area ETF Dangerous Waste Training Plan (DWTP) for a complete description of the personnel training requirements. As required by Permit Condition II.I.1~~2~~, a copy of the LERF & 200 Area ETF DWTP will be placed in the Hanford Facility Operating Record, LERF & 200 Area ETF file, and will be updated by the Permittee as unit-specific conditions change. Training received by facility personnel will be commensurate with the duties they perform. Individuals are not required to receive training for work/duties they do not perform.

LERF and 200 Area ETF~~Liquid Waste Processing Facilities~~ Training Matrix

	Training Category						
Permit Attachment 5, Training Category	**General Hanford Facility Training**	**Contingency Plan Training**	**Emergency Coordinator Training**	**Operations Training**			
LERF & 200 Area ETF~~Liquid Waste Processing Facilities~~ DWTP implementing category	Orientation Program	Emergency Response (contingency plan)	Emergency Coordinator Training	General Waste Management	Container Management	Tank System Management	Surface Impoundment
JOB TITLE/POSITION							
Nuclear Chemical Operator (NCO)	X	X		X	X	X	X
~~Hazardous Waste Coordinator (HWC)~~	~~X~~			~~X~~	~~X~~		
Operations supervisor Shift Operations Manager (SOM)	X	X	X				
Engineer/scientist	X			X			
Environmental Field Representative ~~Compliance Officer~~	X			X			
Waste Service Provider	X			X	X		
Sampler	X			X			X

Hanford Facility RCRA Permit Change Notice	
Unit: **Liquid Effluent Retention Facility & 200 Area Effluent Treatment Facility**	Permit Part **Part III, Operating Unit Group 3**

Description of Modification:

Addendum J, Contingency Plan

- Removed Official Use Only markings from all document footers.
- Section J.3.2.5, changed LPCS to WRPS.
- Section J.6, updated BEP document plan location.

WAC 173-303-830 Modification Class [1 2]	Class 1	Class [1]1	Class 2	Class 3
Please mark the Modification Class:	X			

Enter relevant WAC 173-303-830, Appendix I Modification citation number: A.1

Enter wording of WAC 173-303-830, Appendix I Modification citation: Administrative and informational changes.

Modification Approved: ☑ Yes ☐ No (state reason for denial)

Reason for denial:

Reviewed by Ecology:

S. L. Dahl-Crumpler — 6/15/15

Date

Addendum J Contingency Plan

Figures

Table

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J. CONTINGENCY PLAN

The requirements for a contingency plan at LERF/200 Area ETF are satisfied in the following documents: portions of Hanford Facility Permit (Permit) Attachment 4, *Hanford Emergency Management Plan* (DOE/RL-94-02) and this Addendum.

The unit specific building emergency plan also serves to satisfy a broad range of other requirements [e.g., Occupational Safety and Health Administration standards (29 CFR 1910), *Toxic Substance Control Act of 1976* (40 CFR 761) and U.S. Department of Energy Orders]. Therefore, revisions made to portions of this unit specific building emergency plan that are not governed by the requirements of WAC 173-303 will not be considered as a modification subject to WAC 173-303-830 or Permit Condition I.C.3.

Table J.1 identifies the sections of the unit specific building emergency plan written to meet WAC 173-303-350(3) contingency plan requirements. In addition, Section 12.0 of the unit specific building emergency plan is written to meet WAC 173-303 requirements identifying where copies of Permit Attachment 4, *Hanford Emergency Management Plan* (DOE/RL-94-02) and the building emergency plan are located and maintained on the Hanford Facility. Therefore, revisions to Addendum J require a modification subject to WAC 173-303-830 and/or Permit Condition I.C.3.

Table J.1. Hanford Facility Documents Containing Contingency Plan Requirements of WAC 173-303-350(3)

Requirement	Permit Attachment 4, *Hanford Emergency Management Plan* (DOE/RL-94-02)	Building Emergency Plan[1] (HNF-IP-0263-ETF)	Part III, OU-3, LERF & 200 Area ETF, Addendum J
-350(3)(a) - A description of the actions, which facility personnel must take to comply with this section and WAC 173-303-360.	X[2] Section 1.3.4	X[2] Sections 7.1, 7.2 through 7.2.5, and 7.3[3] Sections 4.0 (1st paragraph), 8.2, 8.3, 8.4, 11.0	X[2] Sections J.3.1, J.3.2, through J.3.2.5, and J.3.3[3] Sections J.3, J.3.4, J.3.5, J.3.6, and J.5
-350(3)(b) - A description of the actions which shall be taken in the event that a dangerous waste shipment, which is damaged or otherwise presents a hazard to the public health and the environment, arrives at the facility, and is not acceptable to the owner or operator, but cannot be transported pursuant to the requirements of WAC 173-303-370(5), Manifest system, reasons for not accepting dangerous waste shipments.	X[2] Section 1.3.4	X[2, 4] Section 7.2.5.1	X[2,4] Section J.3.2.5.1
-350(3)(c) - A description of the arrangements agreed to by local police departments, fire departments, hospitals, contractors, and state and local emergency response teams to coordinate emergency services as required in WAC 173-303-340(4).	X Sections 3.2.3, 3.3.1, 3.3.2, 3.4, 3.4.1.1, 3.4.1.2, 3.4.1.3, 3.7, and Table 3-1		

Table J.1. Hanford Facility Documents Containing Contingency Plan Requirements of WAC 173-303-350(3)

Requirement	Permit Attachment 4, *Hanford Emergency Management Plan* (DOE/RL-94-02)	Building Emergency Plan[1] (HNF-IP-0263-ETF)	Part III, OU-3, LERF & 200 Area ETF, Addendum J
-350(3)(d) - A current list of names, addresses, and phone numbers (office and home) of all persons qualified to act as the emergency coordinator required under WAC 173-303-360(1). Where more than one person is listed, one must be named as primary emergency coordinator, and others must be listed in the order in which they will assume responsibility as alternates. For new facilities only, this list may be provided to the department at the time of facility certification (as required by WAC 173-303-810(14)(a)(I)), rather than as part of the permit application.		X[5] Section 3.1, 13.0	X[5] Sections J.2 and J.7
-350(3)(e) - A list of all emergency equipment at the facility (such as fire extinguishing systems, spill control equipment, communications and alarm systems, and decontamination equipment), where this equipment is required. This list must be kept up to date. In addition, the plan must include the location and a physical description of each item on the list, and a brief outline of its capabilities.		X Section 9.0	X Section J.4
-350(3)(f) - An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary. This plan must describe the signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes.	X[6] Figure 7-3 and Table 5-1	X[7] Section 1.5	X[7] Section J.1

An "X" indicates requirement applies.

[1] Portions of Permit Attachment 4, *Hanford Emergency Management Plan* (DOE/RL-94-02) not enforceable through Appendix A of that document are not made enforceable by reference in the building emergency plan.

[2]Permit Attachment 4, H*anford Emergency Management Plan* (DOE/RL-94-02) contains descriptions of actions relating to the Hanford Site Emergency Preparedness System. No additional description of actions are required if at the site level. If other credible scenarios exist or if emergency procedures at the unit are different, the description of actions contained in the building emergency plan will be used during an event by a building emergency director.

[3]Sections J.1, J.2 through J.2.5, and J.3 of the building emergency plan are those sections subject to the Class 2 "Changes in emergency procedures (i.e., spill or release response procedures)" described in WAC 173-303-830, Appendix I, Section B.6.a.

[4]This requirement only applies to TSD units, which receive shipment of dangerous or mixed waste defined as off-site shipments in accordance with WAC 173-303.

[5]Emergency Coordinator names and home telephone numbers are maintained separate from any contingency plan document, on file in accordance with Permit Condition II.A.4 and are updated, at a minimum, monthly.

[6]The Hanford Facility (site wide) signals are provided in this document. No unit/building signal information is required unless unique devices are used at the unit/building.

[7]An evacuation route for the TSD unit must be provided. Evacuation routes for occupied buildings surrounding the TSD unit are provided through information boards posted within buildings.

J.1 BUILDING EVACUATION ROUTING

Figures J.1 and J.2 provide identification of the primary and secondary staging areas and a general layout of the 2025E and ETF/LERF. Alternate evacuation routes will be used on a case-by-case basis based on meteorological conditions at the time of the event.

J.2 BUILDING EMERGENCY DIRECTOR

Emergency response will be directed by the Building Emergency Director (BED) until the Incident Commander (IC) arrives. The Incident Command System and staff with supporting on-call personnel fulfill the responsibilities of the Emergency Coordinator as discussed in WAC 173-303-360.

During events, ETF/LERF personnel perform response duties under the direction of the BED. The Incident Command Post (ICP) is managed by the senior Hanford Fire Department official, unless the event is determined to be primarily a security event, in which case the Hanford Fire Department and Hanford Patrol will operate under a unified command system with Hanford Patrol making all decisions pertaining to security. These individuals are designated as the IC and as such, have the authority to request and obtain any resources necessary for protecting people and the environment. The BED becomes a member of the ICP and functions under the direction of the IC. In this role, the BED continues to manage and direct LERF/ETF operations.

A listing of BEDs by title, work location, and work telephone numbers is contained in Section J.7 of this plan. The BED is on the premises or is available through an "on-call" list 24 hours a day. Names and home telephone numbers of the BEDs are available from the Patrol Operations Center (POC) in accordance with Permit Condition II.A.4.

J.3 IMPLEMENTATION OF THE PLAN

In accordance with WAC 173-303-360(2)(b) the BED ensures that trained personnel identify the character, source, amount, and areal extent of the release, fire, or explosion to the extent possible. Identification of waste can be made by activities that can include, but are not limited to, visual inspection of involved containers, sampling activities in the field, reference to inventory records, or by consulting with facility personnel. Samples of materials involved in an emergency might be taken by qualified personnel and analyzed as appropriate. These activities must be performed with a sense of immediacy and shall include available information.

The BED shall use the following guidelines to determine if an event has met the requirements of WAC 173-303-360(2)(d):

1. The event involved an unplanned spill, release, fire, or explosion,

AND

2.a The unplanned spill or release involved a dangerous waste, or the material involved became a dangerous waste as a result of the event (e.g., product that is not recoverable.), or

2.b The unplanned fire or explosion occurred at the ETF/LERF or transportation activity subject to RCRA contingency planning requirements,

AND

3. Time urgent response from an emergency services organization was required to mitigate the event or a threat to human health or the environment exists.

As soon as possible, after stabilizing event conditions, the BED shall determine, in consultation with the site contractor environmental single point-of-contact, if notification to the Washington State Department of Ecology (Ecology) is needed to meet WAC 173-303-360(2)(d) reporting requirements. If all of the conditions under 1, 2, and 3 are met, notifications are to be made to Ecology. Additional information is found in Permit Attachment 4, *Hanford Emergency Management Plan*, (DOE/RL-94-02), Section 4.2.

If review of all available information does not yield a definitive assessment of the danger posed by the incident, a worst-case condition will be presumed and appropriate protective actions and notifications will be initiated. The BED is responsible for initiating any protective actions based on their best judgment of the incident.

The BED must assess each incident to determine the response necessary to protect the personnel, facility, and the environment. If assistance from Hanford Patrol, Hanford Fire Department, or ambulance units is required, the Hanford Emergency Response Number (911 from site office phones/373-0911 from cellular phones) must be used to contact the POC and request the desired assistance. To request other resources or assistance from outside the ETF/LERF, the POC business number is 373-3800.

J.3.1 Protective Actions Responses

Protective action responses are discussed in the following sections. The steps identified in the following description of actions do not have to be performed in sequence because of the unanticipated sequence of incident events.

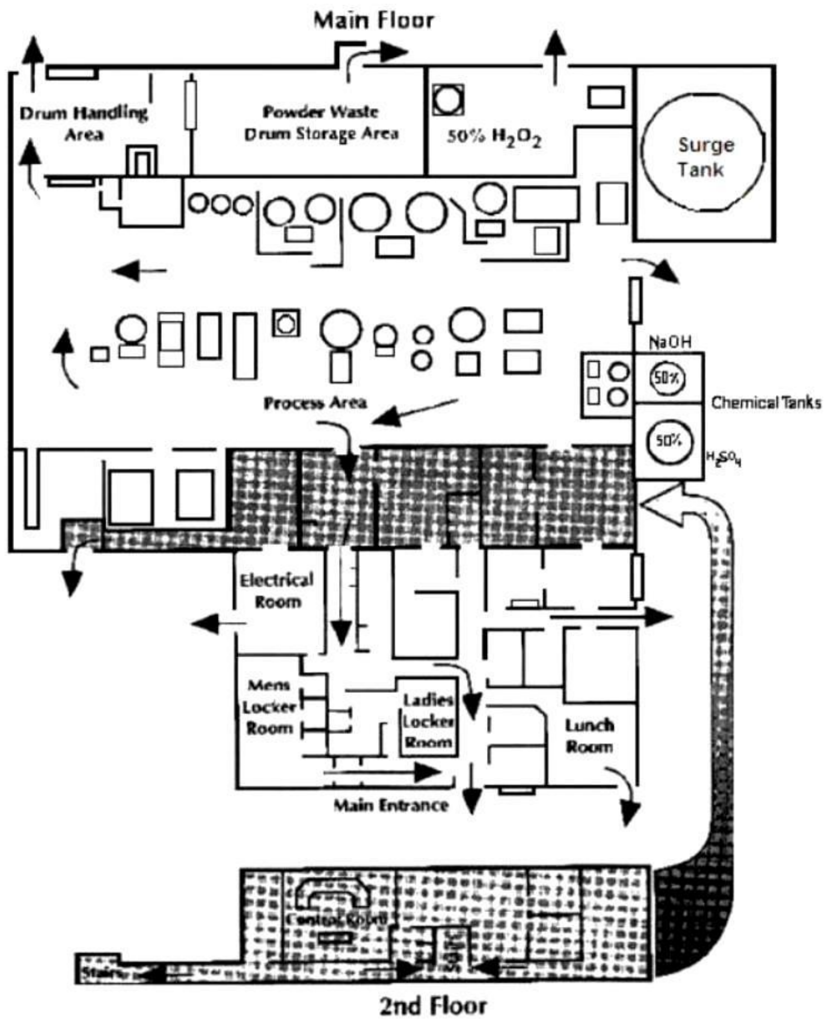
J.3.1.1 Evacuation

The objective of a facility evacuation order is to limit personnel exposure to hazardous materials or dangerous/mixed waste by increasing the distance between personnel and the hazard. The scope of the evacuation includes evacuation of the facility because of an event at the facility as well as evacuation of the facility in response to a site evacuation order. Evacuation will be directed by the BED when conditions warrant and will apply to all personnel not actively involved in the event response or emergency plan related activities.

The BED will initiate the evacuation by directing an announcement be made to evacuate along with the evacuation location over a public address system, facility radios, and, as conditions warrant, by activating the 200 Area site evacuation alarms by calling the POC using 911 from site office phones/373-0911 from cellular phones. Personnel proceed to a predetermined staging area (shown in Figure J.2), or other safe upwind location, as determined by the BED. The BED will determine the operating configuration of the facility and identify any additional protective actions to limit personnel exposure to the hazard.

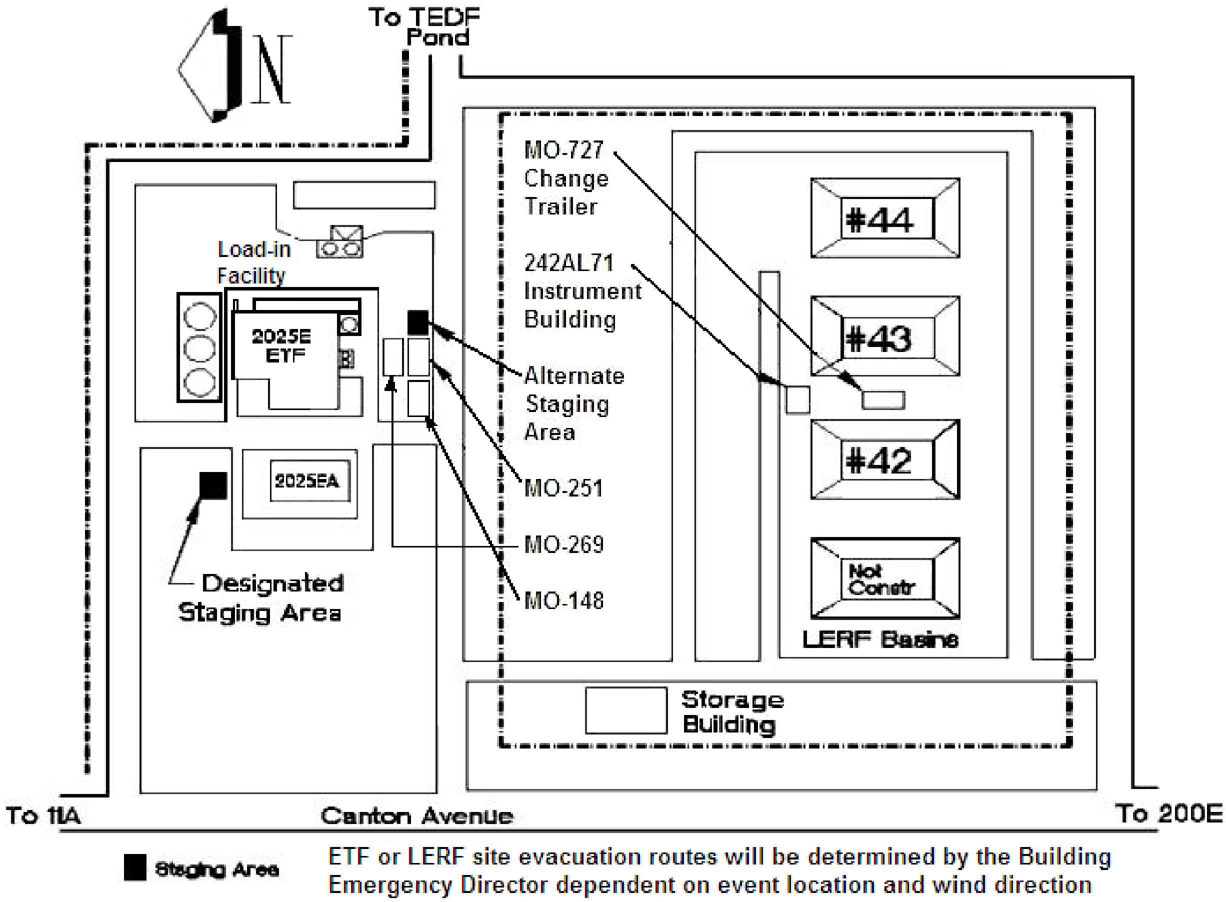
Emergency organization personnel or assigned operations personnel will conduct a sweep of occupied buildings to ensure that all non-essential personnel and visitors have evacuated. For an immediate evacuation, accountability will be performed at the staging area. The BED will assign personnel as accountability aides and staging managers with the responsibility to ensure that evacuation actions are taken at all occupied buildings at the ETF/LERF. All implementing actions executed by the aides/managers are directed by the emergency response procedures. When evacuation actions are complete, the aides/managers will provide a status report to the BED. The BED will provide status to the IC.

Figure J.1 Evacuation Routes from 2025E



1 **Figure J.2. LERF and 200 Area ETF Site Plan**

2



3
4

J.3.1.2 Take Cover

The objective of the take cover order is to limit personnel exposure to hazardous materials, or dangerous/mixed waste when evacuation is inappropriate or not practical. Evacuation might not be practical or appropriate because of extreme weather conditions or the material release might limit the ability to evacuate safely personnel.

The BED will initiate the take cover by directing an announcement be made over the public address system, facility radios, and, as conditions warrant, by activating the 200 Area site take cover alarms by calling the POC using 911 from site office phones/373-0911 from cellular phones). Actions to complete a facility take-cover will be directed by the emergency response procedure. Protective actions associated with operations include configuring, or shutting down, the ventilation systems. Determination of additional take cover response is based on plant operating configuration, weather conditions, amount and duration of release, and other conditions, as applicable to the event and associated hazard. As a minimum, personnel exposure to the hazard will be minimized. The BED will assign personnel as accountability aides with responsibility to ensure that take-cover actions are taken at all occupied buildings at the ETF complex. All implementing actions executed by the aides/managers are directed by the emergency response procedure. When take cover actions are complete, the aides/manager will provide the BED with a status report.

J.3.2 Response to Facility Operations Emergencies

Depending on the severity of the following events, the BED reviews the site wide procedures and ETF/LERF emergency response procedure(s) and, as required, categorizes and/or classifies the event. If necessary, the BED initiates area protective actions and Hanford Site Emergency Response Organization activation. The steps identified in the following description of actions do not have to be performed in sequence because of the unanticipated sequence of incident events.

J.3.2.1 Loss of Utilities

A case-by-case evaluation is required for each event to determine loss of utility impacts. When a BED determines a loss of utility impact, actions are taken to ensure dangerous and/or mixed waste is being properly managed, to the extent possible given event circumstances. As necessary, the BED will stop operations and take appropriate actions until the utility is restored.

J.3.2.2 Major Process Disruption/Loss of Plant Control

The hazards assessment has determined that this occurrence does not pose significant risk to human health or the environment.

J.3.2.3 Pressure Release

The hazards assessment has determined that a pressure release does not pose significant risk to human health or the environment. Hazardous material release and dangerous/mixed waste releases are addressed in Section J.2.5.

J.3.2.4 Fire and/or Explosion

In the event, of a fire, the discoverer activates a fire alarm (pull box); calls 911 from site office phones/373-0911 from cellular phones or verifies that the Hanford Emergency Response Number has been called. Automatic initiation of a fire alarm (through the smoke detectors, and sprinkler systems) is also possible.

- Unless otherwise instructed, personnel shall evacuate the area/building by the nearest safe exit and proceed to the designated staging area for accountability.
- On actuation of the fire alarm, ONLY if time permits, personnel should shut down equipment, secure waste, and lock up classified materials (or hand carry them out). The alarm automatically signals the Hanford Fire Department.

- The BED proceeds directly to the ICP, obtains all necessary information pertaining to the incident, and sends a representative to meet Hanford Fire Department.
- The BED provides a formal turnover to the IC when the IC arrives at the ICP.
- The BED informs the Hanford Site Emergency Response Organization as to the extent of the emergency (including estimates of dangerous waste and mixed waste quantities released to the environment).
- If operations are stopped in response to the fire, the BED ensures that systems are monitored for leaks, pressure buildup, gas generation, and ruptures.
- Hanford Fire Department firefighters extinguish the fire as necessary.

NOTE: Following a fire and/or explosion, WAC 173-303-640(7) will be addressed for the ETF regarding fitness for use.

J.3.2.5 Hazardous Material, Dangerous and/or Mixed Waste Spill

Spills can result from many sources including process leaks, container spills or leaks, damaged packages or shipments, or personnel error. Spills of mixed waste are complicated by the need to deal with the extra hazards posed by the presence of Atomic Energy Act materials. These controls include containment berms, dedicated spill control sumps, remote gauges, and level indicators as well as spray shields on chemical pipe flanges. ~~LPCS~~ WRPS procedures provide alarm response and maintenance actions for leak detection equipment, surveillance of possible leak locations, and response actions for detected spills.

- The discoverer notifies BED and initiates SWIMS response:

  Stops work
  Warns others in the vicinity
  Isolates the area
  Minimizes the exposure to the hazards
  Requests the BED **S**ecure ventilation
- If Operations are stopped, the BED ensures that the plant is put in a safe shutdown configuration.
- The BED determines if emergency conditions exist requiring response from the Hanford Fire Department based on classification of the spill and injured personnel, and evaluates need to perform additional protective actions.
- If the Hanford Fire Department resources are not needed, the spill is mitigated with resources identified in Section J.4 of this plan and proper notifications are made.
- If the Hanford Fire Department resources are needed, the BED calls 911 from site office phones/373-0911 from cellular phones.
- The BED sends a representative to meet the Hanford Fire Department.
- The BED provides a formal turnover to the IC when the IC arrives at the ICP.
- The BED informs the Hanford Site Emergency Response Organization as to the extent of the emergency (including estimates of dangerous waste and mixed waste quantities released to the environment).
- If operations are stopped in response to the spill, the BED ensures that systems are monitored for leaks, pressure buildup, gas generation, and ruptures.
- Hanford Fire Department stabilizes the spill.

NOTE: For response to leaks or spills and disposition of leaking or unfit-for-use tank systems, refer to WAC 173-303-640(7).

J.3.2.5.1 Damaged, or Unacceptable Shipments

During the course of receiving an onsite transfer of dangerous and/or mixed waste at ETF/LERF an unanticipated event could be discovered resulting in a conformance issue concerning the waste. Damaged or unacceptable shipments resulting from onsite transfers are not subject to WAC 173-303-370 however conformance issues must be resolved in order to maintain proper records.

The following actions are taken to resolve the conformance issue:

- Operations management is notified of the damaged or unacceptable waste to be received.
- If the conformance issue results in a spill or release, actions described in Section J.3.2.5 are taken.
- The generating organization is notified of the conformance issue.

An operations representative, in conjunction with the generating organization, determines the course of action to resolve the conformance issue.

J.3.3 Prevention of Recurrence or Spread of Fires, Explosions, or Releases

The BED, as part of the ICP, takes the steps necessary to ensure that a secondary release, fire, or explosion does not occur. The BED will take measures, where applicable, to stop processes and operations, collect and contain released waste, and remove or isolate containers. The BED also monitors for leaks, pressure buildups, gas generation, or ruptures in valves, pipes, or other equipment, whenever this is appropriate.

J.3.4 Incident Recovery and Restart of Operations

A recovery plan is developed when necessary in accordance with Permit Attachment 4, *Hanford Emergency Management Plan*, (DOE/RL-94-02), Section 9.2. A recovery plan is needed following an event where further risk could be introduced to personnel, the ETF/LERF, or the environment through recovery action and/or to maximize the preservation of evidence.

If this plan was implemented according to Section J.3 of this plan, Ecology is notified before operations can resume. The Permit Attachment 4, *Hanford Emergency Management Plan*, (DOE/RL-94-02), Section 5.1 discusses different reports to outside agencies. This notification is in addition to those required reports and includes the following statements:

- There are no incompatibility issues with the waste and released materials from the incident.
- All the equipment has been cleaned, fit for its intended use, and placed back into service.

The notification required by WAC 173-303-360(2)(j) may be made via telephone conference. Additional information that Ecology requests regarding these restart conditions will be included in the required 15-day report identified in Section J.5 of this plan.

For emergencies not involving activation of the Hanford EOC, the BED ensures that conditions are restored to normal before operations are resumed. If the Hanford Site Emergency Response Organization was activated and the emergency phase is complete, a special recovery organization could be appointed at the discretion of RL to restore conditions to normal. This process is detailed in RL and contractor emergency procedures. The makeup of this organization depends on the extent of the damage and the effects. The onsite recovery organization will be appointed by the appropriate contractor's management.

J.3.5 Incompatible Waste

After an event, the BED or the onsite recovery organization ensures that no waste that might be incompatible with the released material is treated, stored, and/or disposed of until cleanup is completed. Cleanup actions are taken by ETF/LERF personnel or other assigned personnel. Permit Attachment 4, *Hanford Emergency Management Plan*, (DOE/RL-94-02), Section 9.2.3, describes actions to be taken.

Waste from cleanup activities is designated and managed as newly generated waste. A field check for compatibility before storage is performed as necessary. Incompatible wastes are not placed in the same container. Containers of waste are placed in storage areas appropriate for their compatibility class.

If incompatibility of wastes was a factor in the incident, the BED or the onsite recovery organization ensures that the cause is corrected.

J.3.6 Post Emergency Equipment Maintenance and Decontamination

All equipment used during an incident is decontaminated (if practicable) or disposed of as spill debris. Decontaminated equipment is checked for proper operation before storage for subsequent use. Consumable and disposed materials are restocked. Fire extinguishers are replaced.

The BED ensures that all equipment is cleaned and fit for its intended use before operations are resumed. Depleted stocks of neutralizing and absorbing materials are replenished; protective clothing is cleaned or disposed of and restocked, etc.

J.4 EMERGENCY EQUIPMENT

Emergency resources and equipment for the ETF/LERF are presented in this section.

J.4.1 Fixed Emergency Equipment

TYPE	LOCATION	CAPABILITY
Safety shower/ eye wash stations (ETF only)	1 - 2025E Rm 122 Decon Station 1 - 2025E South Wall of Process Area 1- 2025E Rm 131 1 - 2025E Rm 134 1 - Outside south 2025E near acid/ caustic tanks 1 - Outside at Load-in station 1 - 2025E Rm 112 Laboratory	Assist in flushing chemicals/ materials from the body and/ or eyes and face of personnel.
Wet pipe sprinkler (ETF only)	Throughout the ETF except those areas protected by preactive sprinklers	Assist in the control of a fire.
Preactive sprinkler (ETF only)	Control room, communications room, electrical equipment room	Assist in the control of a fire. Maintained dry to prevent accidental damage to equipment
Fire alarm pull boxes (ETF only)	All high traffic areas in operations administration and support areas, truck bay, and process area	Activate the local fire alarm
E-lights	Throughout ETF	1 hour temporary lighting

J.4.2 Portable Emergency Equipment

TYPE	LOCATION	CAPABILITY
Fire extinguisher ABC type	Throughout ETF (Administrative/Support areas), LERF, and TEDF	Fire suppression for Class A, B, and C fires
Fire extinguisher BC type	Throughout ETF (process area and electrical room)	Fire suppression for Class B and C fires
Portable safety showers and Eye Wash Stations	As needed for special evolutions and maintenance	Assist in flushing chemicals/ materials from the body and/or eyes and face of personnel.

J.4.3 Communications Equipment/Warning Systems

TYPE	LOCATION	CAPABILITY
Fire alarms (ETF only)	Corridors, locker rooms, process area, drum storage, and truck bay	Audible throughout ETF
Take cover/evacuation	Throughout the ETF	Audible outside buildings and inside administrative buildings
Public address system (ETF Only)	Throughout the ETF	Audible throughout ETF
Portable radios	Operations and maintenance personnel	Communication to control room
Telephone	**ETF**– control room, 2025E, 2025EA offices, MO-148, MO-269, MO-251, 2025EC71. **LERF**– MO-727 and 242AL71 instrument building, LERF Garage 242AL11 **TEDF**– 225E(pump house 1), 225W (pump house 2), 6653 (sample building), 6653A (pump house 3)	Internal and external communications. Allows notification of outside resources (POC, HFD, Hanford Patrol, etc.

Note: Sitewide communications and warning systems are identified in Permit Attachment 4, *Hanford Emergency Management Plan*, (DOE/RL-94-02), Table 5.1.

J.4.4 Personal Protective Equipment

TYPE	LOCATION	CAPABILITY
Acid suits	In the spill response cabinets in 2025E	Chemical protection for personnel during containment and isolation
Respirators	2025E, 1st Floor	Filtered air for recovery of known hazards

J.4.5 Spill Control and Containment Supplies

SPILL KITS AND SPILL CONTROL EQUIPMENT		
TYPE	**LOCATION**	**CAPABILITY**
Spill bags, drums, carts, etc.	4 – 2025E in process area 1 – TEDF 6653 Disposal Building 1 – 2025E upper level process area 1 – 2025E Rm 125A 1 – 2025ED Load-In Station CONEX	Support containment and cleanup of hazardous material spills
Spill response cabinet	1 – 2025E Rm 122 2 – container storage CONEX East of 2025E building within the TSD unit boundary 1 – TEDF 6653 Disposal Building 1 – MO-727 Change Trailer 1 – outside southeast side of 2025E	Support equipment for spill response

J.4.6 Incident Command Post

The ICPs for the ETF/LERF are in ETF control room or 2025 EA. Emergency resource materials are stored at each location. The IC could activate the Hanford Fire Department Mobile Command Unit if necessary.

J.5 REQUIRED REPORTS

Post incident, written reports are required for certain incidents on the Hanford Site. The reports are described in Permit Attachment 4, *Hanford Emergency Management Plan*, (DOE/RL-94-02), Section 5.1.

Facility management must note in the Hanford Facility Operating Record, LERF & 200 Area ETF File, the time, date and details of any incident that requires implementation of the contingency plan (refer to Section J.3). Within fifteen (15) days after the incident, a written report must be submitted to Ecology. The report must include the elements specified in WAC 173-303-360(2)(k).

J.6 PLAN LOCATION AND AMENDMENTS

Copies of this plan are maintained at the following locations:

- ETF control room
- ~~Operations Managers office (~~Building 2025EA ICP~~)~~

This plan will be reviewed and immediately amended as necessary, in accordance with Permit Attachment 4, *Hanford Emergency Management Plan*, (DOE/RL-94-02), Section 14.3.1.1.

J.7 FACILITY/BUILDING EMERGENCY RESPONSE ORGANIZATION

ETF/LERF Building Emergency Directors		
TITLE	**WORK LOCATION**	**WORK PHONE**
Shift Operation Manager (SOM)	2025E Building	373-9000 or 373-9500

Names and home telephone numbers of the BEDs are available from the POC (373-3800) in accordance with Permit Condition II.A.4.

Remove and Replace the Following Pages:

Part III, Operating Unit Group 3, Permit Conditions
- Pages III.1 through III.8

Addendum B, Waste Analysis Plan
- Pages B.i through B.36

Addendum G, Personnel Training
- Page G.1

Addendum J, Contingency Plan
- Pages J.i through J.12

Quarter Ending March 31, 2015

Hanford Facility RCRA Permit Modification Notification Form
Part III, Operating Unit 10
Waste Treatment and Immobilization Plant

Index

Submitted by Co-Operator:

Roger J Landon 3/10/15

Roger J. Landon Date

Reviewed by ORP Program Office:

for 3/31/2015

D. L. Noyes Date

Hanford Facility RCRA Permit Modification Notification Form	
Unit: **Waste Treatment and Immobilization Plant**	Permit Part: **Part III, Operating Unit 10**

Description of Modification:

The purpose of this modification is to revise the WTP Interim Compliance Schedule Item 23 in Appendix 1.0 of the Dangerous Waste Permit. The proposed new completion date is December 31, 2015.

Appendix 1.0
WTP Interim Compliance Schedule

Interim Compliance Schedule- WTP Facility		
	Compliance Schedule Submittal	**Interim Compliance Date**
23.	Submit engineering information for LAW Vitrification Miscellaneous Treatment Unit sub-system	~~12/31/2014~~ 12/31/2015

Justification:

The required 14-day notification was submitted to Ecology in the Permittee letter from McCullough, M. G., BNI, and Smith, K. W., ORP, to Hedges, J. A., Ecology, "14-Day Notification, Hanford Facility Resource Conservation and Recovery Act, Appendix 1.0, Waste Treatment and Immobilization Plant Interim Compliance Schedule Item 23", 14-ECD-0056/CCN 271717, dated January 12, 2015.

The letter provided intermediate target dates with no contingency built-in for measuring progress toward completion of three LAW design packages which represented a point in time. Like any Project, target dates move as activities shift. To track progress toward completion of the WTP Interim Compliance Schedule Item 23 by 12/31/2015, the intermediate target dates for each remaining package below represent the current working schedule and show an earlier submittal for LAW-016 and slight delays for LAW-025 and LAW-028 than the January 2015 letter.

New target dates and information specific to each package are provided below:

<u>LAW-016, Miscellaneous Unit Subsystem for LAW Facility LMP System at El. 3ft (Melter).</u>
Completion of this package is ahead of the earlier forecast because finalizing the Corrosion Evaluation for review by the IQRPE was accelerated by 5 weeks.

Target Date for Early Ecology review 6/3/2015
Target Date for Comments resolved 8/5/2015
Target Date for Submit to Ecology 9/17/2015

<u>LAW-025, Miscellaneous Unit Subsystem for LAW Facility LVP System (Selective Catalytic Oxidizer, Selective Catalytic Reducer, Electric Heater, and Heat Exchanger Skid).</u>
Completion of calculations are later than forecast in the 14-day notification letter because of weld issues impacting physical design, physical changes to the equipment configuration, and correction of errors found during the final calculation review and approval cycle.

Target Date for Ecology Early review 3/24/2015
Target Date for Comments resolved 5/26/2015
Target Date for Submit to Ecology 7/8/2015

<u>LAW-028, Miscellaneous Unit Subsystem for LAW Facility LVP System (LAW Melter Offgas Caustic Scrubber).</u>
These dates have been reforecast since the letter was sent to Ecology, because Engineering resource allocation was reprioritized based on the LAW critical path concerns (TCO and WESP Vessel work). In addition, vendor

Quarter Ending March 31, 2015

changes to certain internal component weights and sizes, constructability weld issues, and lack of vendor final assembly drawings continue to impact the completion of the calculation. Resolution of these issues have resulted in delays in finalizing the calculations.

The early review shown below is to verify that Ecology's previously submitted comments have been resolved.

Target Date for Early Ecology review 5/01/2015
Target Date for Comments resolved 6/12/15
Target Date for Submit to Ecology 7/20/2015

We anticipate that between now and December 31, 2015 target dates could move based on the IQRPE or Ecology review. DOE and BNI will status these activities in our routine interface meetings.

In accordance with Permit Condition III.10.C.2.e, this permit modification sent to Ecology may include page changes to the Permit, attachments, and permit application supporting documentation.

WAC 173-303-830 Modification Class:	Class 1	Class 11	Class 2	Class 3
Please mark the Modification Class:		X		

Enter relevant WAC 173-303-830, Appendix I Modification citation number:
A.5.a
Enter wording of WAC 173-303-830, Appendix I Modification citation:

A.5.a Change in interim compliance dates, with prior approval of the Director

Modification Approved/Concur: ☑ Yes ☐ Denied (state reason below)	Reviewed by Ecology:
<u>Reason for denial:</u>	S. Dahl (signature) 5/27/15 S. Dahl — Date

Interim Compliance Schedule- WTP Facility		
	Compliance Schedule Submittal	Interim Compliance Date
	permit	
17.	Submit descriptions of containment building management practices	12/30/2017
	PRETREATMENT PLANT MISC. UNITS SYSTEMS III.10.G.	
18.	Submit engineering information for secondary containment and leak detection system for the Pretreatment Plant Miscellaneous Unit Systems	Complete
19.	Submit engineering information for Pretreatment Plant Miscellaneous Unit Systems	12/31/2017
20.	Submit engineering information for Pretreatment Plant Miscellaneous Unit Systems equipment	12/31/2017
21.	Submit descriptions of management practices for the Pretreatment Miscellaneous Treatment System	06/30/2018
	LAW SHORT TERM MELTER UNIT III.10.H.5	
22.	Submit engineering information for LAW Vitrification Miscellaneous Treatment Unit secondary containment	Complete
23.	Submit engineering information for LAW Vitrification Miscellaneous Treatment Unit sub- system	12/31/2015
24.	Submit engineering information for equipment for each LAW Vitrification Miscellaneous Treatment Unit sub-system	Complete
25.	Submit descriptions of management practices for the LAW Vitrification Miscellaneous Treatment System	06/30/2018
26.	Submit LAW Vitrification Environmental Performance Demonstration Test Plan for Ecology review and approval	01/01/2018
	HLW SHORT TERM MELTER UNIT III.10.J.5	
27.	Submit engineering information for HLW Vitrification Miscellaneous Treatment Unit secondary containment	Complete
28.	Submit engineering information for HLW Vitrification Miscellaneous Treatment Unit sub- system	Complete
29.	Submit engineering information for equipment for each HLW Vitrification Miscellaneous	Complete