



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

NOV 6 2009

09-AMCP-0224

Ms. J. A. Hedges, Program Manager  
Nuclear Waste Program  
State of Washington  
Department of Ecology  
3100 Port of Benton  
Richland, Washington 99354

Dear Ms. Hedges:

**PROTECTIVE FILING DISPOSITION OF THE 216-A-10 CRIB (TSD: D-2-2)**

This letter transmits a request to the State of Washington Department of Ecology (Ecology) to change the 216-A-10 Crib Hazardous Waste Management Act treatment, storage, and/or disposal (TSD) unit regulatory disposition. The U.S. Department of Energy Richland Operations Office (RL) is requesting that this TSD unit be reclassified as a past practice unit in the 200-PW-2 Source Operable Unit because the original Dangerous Waste Part A Permit Application (Part A form) for the Hanford facility was submitted as a protective filing with respect to the 216-A-10 Crib. Reclassification is based on the fact that the 216-A-10 Crib did not receive mixed waste after the effective date of the mixed waste rule in Washington State (August 19, 1987).

Enclosure 1 contains as-built drawings signed and dated April 1, 1987, verifying completion of piping modifications that physically isolated the 216-A-10 Crib from further receipt of waste. Drawing H-2-77039, identifies the 216-A-10 Crib in Grid D7, and provides reference to Detail 1. Drawing H-2-77041, Detail 1 shows the line being cut and sealed.

The 216-A-10 Crib section of the Part A form submitted to Ecology in September 1987 identifies that this crib was used to dispose of Plutonium-Uranium Extraction process distillate (PPD). This waste stream was corrosive in nature, although as a waste stream with a radioactive component subject to regulation as a source, special nuclear or byproduct material under the Atomic Energy Act, it was not subject to regulation under the Hazardous Waste Management Act prior to the effective date of mixed waste regulation in the State of Washington, August 19, 1987. This crib is documented to have received only PPD during operations. The Part A form states that this site received its final volume of waste in March 1987, before the August 19, 1987, effective date of mixed waste regulation in the State of Washington. Because the 216-A-10 Crib ceased operations before August 19, 1987, this unit never operated as a TSD unit in the management of mixed waste regulated under WAC 173-303, Dangerous Waste Regulations.

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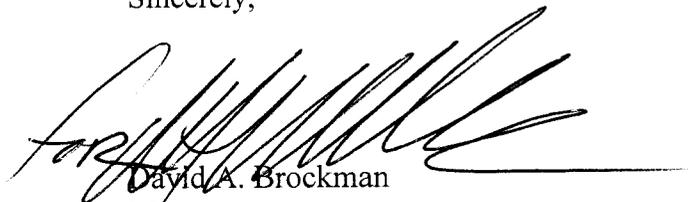
As the location of releases occurring before the August 19, 1987, effective date, the 216-A-10 Crib is a solid waste management unit subject to the corrective action authority of WAC 173-303-646, and should be dispositioned as a past practice waste site in accordance with the Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement), Section 7.0, Past Practice Processes.

RL requests that Ecology confirm disposition of the 216-A-10 Crib as a protective filing via a reply to this letter. Upon receipt of the requested letter from Ecology, the permit application Part A form will be considered withdrawn with respect to the 216-A-10 TSD unit. In addition, RL proposes taking the following actions under the Tri-Party Agreement. Enclosure 2 is a draft Tri-Party Agreement Change Request to modify Appendix B of the Tri-Party Agreement Action Plan to remove the 216-A-10 Crib from the list of TSD units. Enclosure 3 is a draft Tri-Party Agreement Change Request that modifies Appendix C of the Tri-Party Agreement Action Plan to remove the double asterisk from the waste site listing.

Upon Ecology notification of acceptance of 216-A-10 Crib disposition as a protective filing, these Draft Tri-Party Agreement Change Requests will be finalized and submitted to Ecology for approval.

If you have any questions, please contact me, or your staff may contact Matt McCormick, Assistant Manager for the Central Plateau, on (509) 373-9971.

Sincerely,



David A. Brockman  
Manager

AMCP:RDH

Enclosures

cc: See Page 3

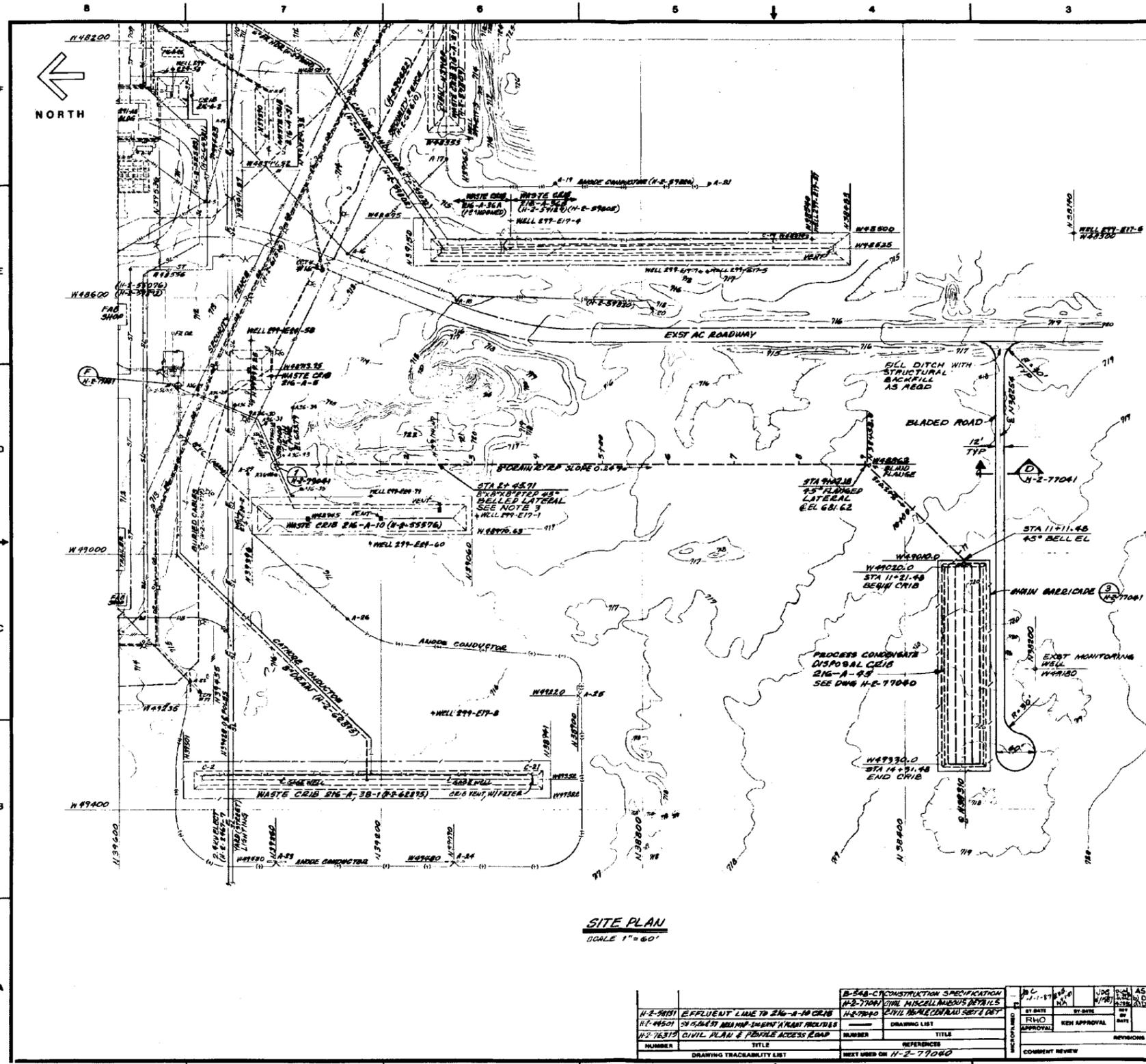
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cc w/encls:

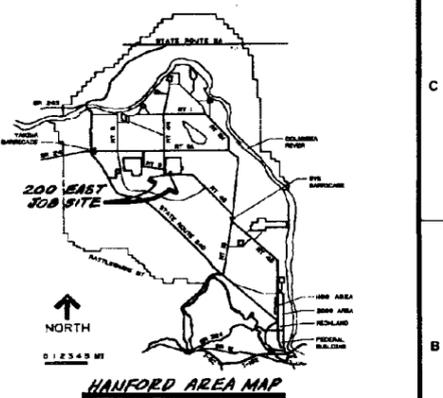
G. Bohnee, NPT  
L. Buck, Wanapum  
G. P. Davis, Ecology  
D. A. Faulk, EPA  
S. Harris, CTUIR  
R. Jim, YN  
S. L. Leckband, HAB  
K. Niles, ODOE  
J. B. Price, Ecology  
R. Skinnarland, Ecology  
Administrative Record, (TSD: D-2-2)  
Environmental Portal

cc w/o encls:

M. H. Doornbos, CHPRC  
R. H. Engelmann, CHPRC  
M. J. Hickey, FFS  
G. J. LeBaron, CHPRC  
A. G. Miskho, CHPRC  
R. E. Piippo, CHPRC  
S. A. Thompson, MSA  
J. G. Vance, FFS  
C. B. Walker, CHPRC

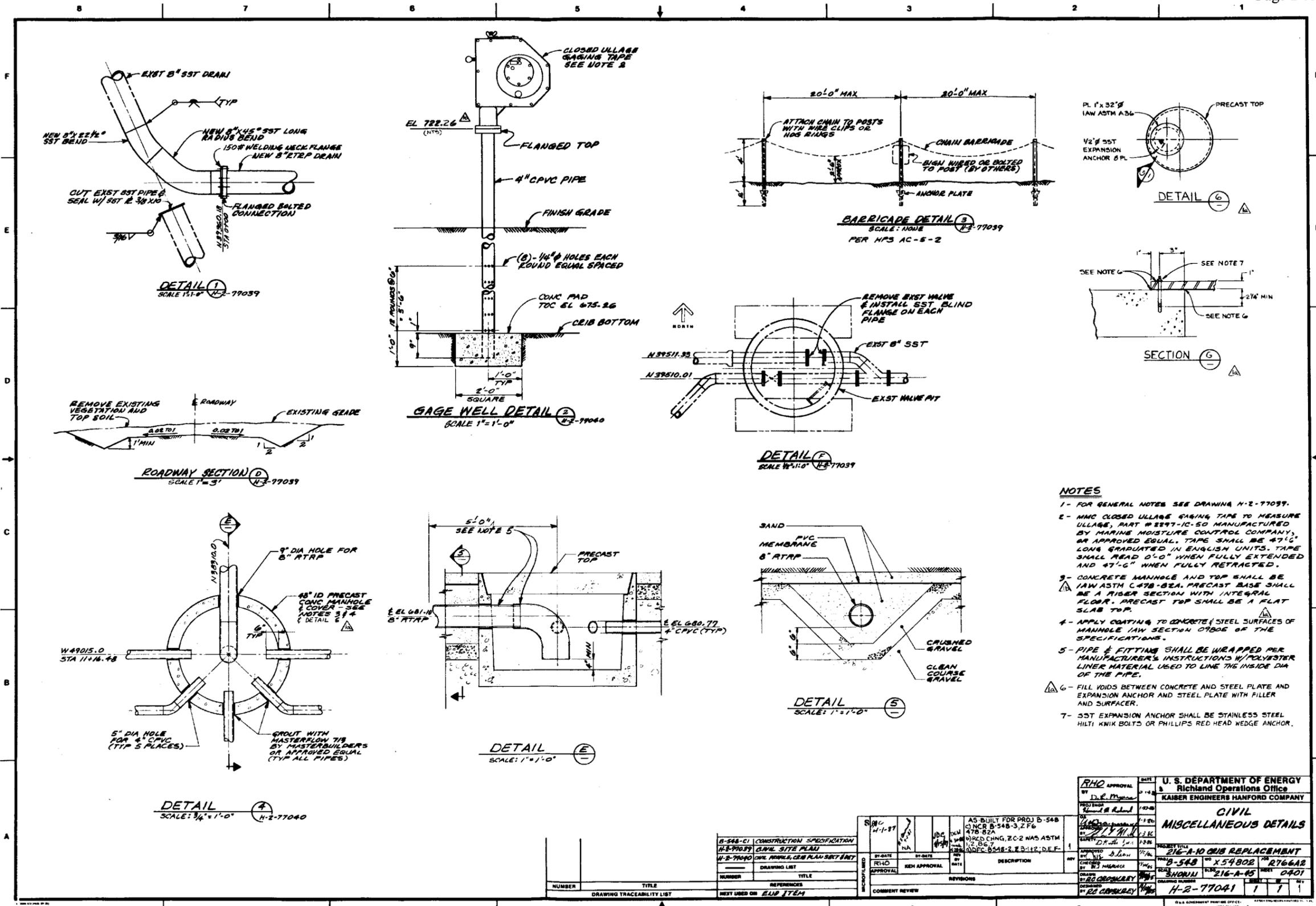


- GENERAL NOTES**
- 1- REINFORCED THERMOSETTING RESIN PIPE (ETEP) SHALL BE RT2P-12 EE-3112 IAW N0TH 0 2996
  - 2- ENLORINATED POLYVINYL CHLORIDE (CPVC) PIPE SHALL BE SCHEDULE 80 PIPE IAW ASTM F441
  - 3- INSTALL BELLED LATERAL WITH LATERAL VERTICAL. TERMINATE LATERAL WITH 8" RT2P 12" LONG, FLANGE AND BLIND FLANGE.
  - 4- SPOIL PILES SHALL NOT BE PLACED OVER EXISTING FACILITIES. EXISTING FACILITIES INCLUDE ABOVE AND BELOW GRADE FACILITIES SUCH AS CRABS, FENCES, ROADS, WELLS, ETC. SHOWN ON SITE PLAN.
  - 5- MAXIMUM GRADE OF BLADED ROAD SHALL BE 1%.
  - 6- LANDSCAPE AREAS DISTURBED BY THIS WORK IN ACCORDANCE WITH SECTION 02900 OF THE SPECIFICATION B-548-C1.
  - 7- PIPE SHALL BE LAID TO PRESCRIBED GRADE SHOWN. VARIANCE FROM ESTABLISHED LINE AND GRADE SHALL NOT BE GREATER THAN 1/8" PER INCH OF PIPE DIAMETER, PROVIDED SUCH VARIATION DOES NOT RESULT IN A LEVEL OR REVERSE SLOPING INVERT.
  - 8- INSTALL UNDERGROUND RADIOACTIVE MATERIAL SIGNS ALONG PIPELINE ROUTE FROM TIE-IN POINT (STA 0+00) TO STA 11+11.48 AND AROUND CRAB BOUNDARY. MAXIMUM SIGN SPACING 100 FEET. SIGNS SHALL BE IN ACCORDANCE WITH RHO-MA-220, REV 1, SECTION B.7 AND WSP-0055.



**SITE PLAN**  
 SCALE 1" = 60'

|   |  |  |  |
|---|--|--|--|
| RHO APPROVAL<br>BY: D. E. [Signature]<br>DATE: 11/14/95                                 |  | U. S. DEPARTMENT OF ENERGY<br>Richland Operations Office<br>KAISER ENGINEERS HANFORD COMPANY |  |
| PROJECT NO: 216-A-10 CRAB REPLACEMENT<br>DRAWING NO: H-2-77039                          |  | CIVIL<br>SITE PLAN   |  |
| DRAWING TRACKABILITY LIST<br>NUMBER: H-2-77039<br>TITLE: EFFLUENT LINE TO 216-A-10 CRAB |  | AS BUILT FOR PROJ B-548<br>216-A-95  |  |
| DRAWING TRACKABILITY LIST<br>NUMBER: H-2-77039<br>TITLE: EFFLUENT LINE TO 216-A-10 CRAB |  | DRAWING TRACKABILITY LIST<br>NUMBER: H-2-77039<br>TITLE: EFFLUENT LINE TO 216-A-10 CRAB      |  |



|              |      |                                  |
|--------------|------|----------------------------------|
| RHO APPROVAL | DATE | U. S. DEPARTMENT OF ENERGY       |
| BY           |      | Richland Operations Office       |
| PROJECT      |      | KAISER ENGINEERS HANFORD COMPANY |
| DESIGNED     |      | CIVIL                            |
| CHECKED      |      | MISCELLANEOUS DETAILS            |
| APPROVED     |      | PROJECT TITLE                    |
| BY           |      | 216-A-10 CRIS REPLACEMENT        |
| DATE         |      | PROJ B-548                       |
|              |      | NO X 54802                       |
|              |      | FOR 276642                       |
|              |      | ISSUED                           |
|              |      | 216-A-05                         |
|              |      | 0401                             |
|              |      | H-2-77041                        |
|              |      | 1 1 1                            |

|  |   |                                 |             |                      |             |     |  |  |  |       |      |                      |             |     |  |  |  |       |      |                      |             |         |  |  |  |             |
|--|---|---------------------------------|-------------|----------------------|-------------|-----|--|--|--|-------|------|----------------------|-------------|-----|--|--|--|-------|------|----------------------|-------------|---------|--|--|--|-------------|
| <b>Change Number</b><br><br>B-09-xx  | <b>Federal Facility Agreement and Consent Order</b><br><b>Change Control Form</b><br><small>Do not use blue ink. Type or print using black ink.</small><br><b>DRAFT</b> | <b>Date</b><br><br>June 1, 2009 |             |                      |             |     |  |  |  |       |      |                      |             |     |  |  |  |       |      |                      |             |         |  |  |  |             |
| <b>Originator Phone</b> B. L. Charboneau, U.S. Department of Energy<br>(509) 373-6137  |   |                                 |             |                      |             |     |  |  |  |       |      |                      |             |     |  |  |  |       |      |                      |             |         |  |  |  |             |
| <b>Class of Change</b><br><input type="checkbox"/> I - Signatories <input checked="" type="checkbox"/> II - Executive Manager <input type="checkbox"/> III - Project Manager   |   |                                 |             |                      |             |     |  |  |  |       |      |                      |             |     |  |  |  |       |      |                      |             |         |  |  |  |             |
| <b>Change Title</b><br>Delete the 216-A-10 Crib from Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) Appendix B.  |   |                                 |             |                      |             |     |  |  |  |       |      |                      |             |     |  |  |  |       |      |                      |             |         |  |  |  |             |
| <p style="text-align: center;"><b>Description/Justification of Change</b></p> <p>The 216-A-10 Crib Dangerous Waste Part A, Permit Application, Revision 5 (Part A form), identifies this crib was used to dispose of Plutonium-Uranium Extraction (PUREX) process distillate discharge (PDD) that was a corrosive mixed waste. This crib is documented to have received only PUREX PPD waste during operations. The Part A form states that this site received its last waste in March 1987. As agreed to by the U.S. Department of Energy and the State of Washington, Department of Ecology the date that the mixed waste rule applies is August 19, 1987, and any discharges occurring before this effective date would constitute a past practice activity. Documentation in the form of as-built drawings signed and dated April 1, 1987; verify the completion of piping modifications that physically isolated the 216-A-10 Crib from further receipt of waste. Because the 216-A-10 Crib received only mixed waste and ceased operations before August 19, 1987, this unit never received waste after the date that the mixed waste rule applies. Consequently, the 216-A-10 Crib should be reclassified as a past practice waste site in the 200-PW-2 operable unit from that of a TSD by modification of Tri-Party Agreement Action plan Appendix C.</p> <p style="text-align: center;">Description/Justification of Change continued on page 2.</p> |   |                                 |             |                      |             |     |  |  |  |       |      |                      |             |     |  |  |  |       |      |                      |             |         |  |  |  |             |
| <p style="text-align: center;"><b>Impact of Change</b></p> <p>This is an administrative change to Appendix B which will not impact Agreement milestones or schedules.</p>  |   |                                 |             |                      |             |     |  |  |  |       |      |                      |             |     |  |  |  |       |      |                      |             |         |  |  |  |             |
| <b>Affected Documents</b><br>Hanford Federal Facility Agreement and Consent Order, Appendix B, as amended.   |   |                                 |             |                      |             |     |  |  |  |       |      |                      |             |     |  |  |  |       |      |                      |             |         |  |  |  |             |
| <b>Approvals</b><br><br><table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 40%; border-bottom: 1px solid black;">_____</td> <td style="width: 10%; border-bottom: 1px solid black;">Date</td> <td style="width: 10%; text-align: center;">_____ Approved _____</td> <td style="width: 40%; text-align: center;">Disapproved</td> </tr> <tr> <td>DOE</td> <td></td> <td></td> <td></td> </tr> <tr> <td style="border-bottom: 1px solid black;">_____</td> <td style="border-bottom: 1px solid black;">Date</td> <td style="text-align: center;">_____ Approved _____</td> <td style="text-align: center;">Disapproved</td> </tr> <tr> <td>EPA</td> <td></td> <td></td> <td></td> </tr> <tr> <td style="border-bottom: 1px solid black;">_____</td> <td style="border-bottom: 1px solid black;">Date</td> <td style="text-align: center;">_____ Approved _____</td> <td style="text-align: center;">Disapproved</td> </tr> <tr> <td>Ecology</td> <td></td> <td></td> <td></td> </tr> </table>  |   | _____                           | Date        | _____ Approved _____ | Disapproved | DOE |  |  |  | _____ | Date | _____ Approved _____ | Disapproved | EPA |  |  |  | _____ | Date | _____ Approved _____ | Disapproved | Ecology |  |  |  | Page 1 of 2 |
| _____  | Date  | _____ Approved _____            | Disapproved |                      |             |     |  |  |  |       |      |                      |             |     |  |  |  |       |      |                      |             |         |  |  |  |             |
| DOE  |   |                                 |             |                      |             |     |  |  |  |       |      |                      |             |     |  |  |  |       |      |                      |             |         |  |  |  |             |
| _____  | Date  | _____ Approved _____            | Disapproved |                      |             |     |  |  |  |       |      |                      |             |     |  |  |  |       |      |                      |             |         |  |  |  |             |
| EPA  |   |                                 |             |                      |             |     |  |  |  |       |      |                      |             |     |  |  |  |       |      |                      |             |         |  |  |  |             |
| _____  | Date  | _____ Approved _____            | Disapproved |                      |             |     |  |  |  |       |      |                      |             |     |  |  |  |       |      |                      |             |         |  |  |  |             |
| Ecology  |   |                                 |             |                      |             |     |  |  |  |       |      |                      |             |     |  |  |  |       |      |                      |             |         |  |  |  |             |

**DRAFT**

Description/Justification of Change continued:

**Modifications to Tri-Party Agreement Appendix B.**

Modifications to Tri-Party Agreement Appendix B are denoted using ~~strikeout~~ for text deletions.

**Appendix B**

Listing of Treatment, Storage, and Disposal Groups/Units.

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Treatment, Storage and Disposal  
Planned Action

| Group<br>Operating<br>Number<br>Closure* | Group/Units<br>Permit    | Operable Unit<br>(if applicable) |              |
|--|--------------------------|----------------------------------|--------------|
| D-2-2                                    | <del>216-A-10-Crib</del> | <del>200-PO-2</del>              | <del>X</del> |



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Description/Justification Continued:

Consequently, the 216-A-10 Crib is reclassified as a past practice waste site, from that of a TSD, by modification of Tri-Party Agreement Action plan Appendix C. The double asterisks, indicating a TSD site, are removed by this change request from the 216-A-10 Crib in Appendix C.

**Modifications to Tri-Party Agreement Appendix C.**

Modifications to Tri-Party Agreement Appendix C are denoted using ~~strikeout~~ for text deletions.

**Appendix C**  
Listing by Operable Unit.

| <b>OPERABLE UNIT</b><br><b>Waste Unit Name</b><br><b>Status</b> | <b>LEAD REGULATORY AGENCY</b><br><b>Waste Unit Aliases</b> | <b>Unit Type</b> |
|---|--|------------------|
| 200-PW-2  | Ecology  | RPP              |
| 216-A-10**  | 216-A-10, 216-A-10 Crib                                    | Crib             |

Note: The strike through appearing below the double asterisk is indicating the deletion of the double asterisk.

Appendix C footnotes (displayed for information)

- \* Active waste management units where a hazardous substance has been potentially released or a substantial threat of a release of a hazardous substance exists.
- \*\* Treatment Storage and Disposal (TSD) units where closure and permitting activities are to be coordinated with past practice investigation and remediation activities.
- † Interim Action Record of Decision for the 100-BC-1, 100-BC-2, 100-DR-1, 100-DR-2, 100-FR-1, 100-FR-2, 100-HR-1, 100-HR-2, 100-KR-1, 100-KR-2, 100-IU-2, 100-IU-6, and 200-CW-3 Operable Units (1999)